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The City of Austin  
Neighborhood Housing and Community Development Office  
P.O. Box 1088  
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December 27, 2018

Re: Public Comment for Draft Implementation Plan of the Strategic Housing  
Blueprint

To the City of Austin,

This letter is to provide public comment on the Draft Implementation Plan of the  
Strategic Housing Blueprint.

We commend the City of Austin for their continued commitment to provide  
funding for housing and services programs that serve people experiencing  
homelessness and the thoughtful attention in the Plan to how the City can be a  
part of the solution.

We have specific comments in the following sections of the document. In  
addition, we encourage the Plan to refer to units that are created for households  
experiencing homelessness as Continuum of Care (CoC) units, to include  
Permanent Supportive Housing (PSH) and Rapid Re-housing (RRH) programs.  
Agencies who serve people experiencing homelessness rely on both programs to  
provide affordable housing.

**Objective 11.6. IMPLEMENT RECOMMENDATIONS IN THE AUSTIN/TRAVIS  
COUNTY REENTRY ROUNDTABLE REPORT**

- ECHO appreciates the support from the City for policies that ensure that  
recipients of City funding have reasonable look-back periods for criminal  
offenses. This will greatly benefit the community's ability to house people  
experiencing homelessness, who are often screened out of affordable  
housing opportunities. We have the following specific edit suggestions:
  - Replace the term 'appeal' with 'individualized review', and
  - Replace all the 'the City should' statements in the final paragraph  
with the 'The City should require full implementation of the  
recommendations set forth in the RRT Guide'.

**Objective III.1: PURSUE FUTURE GENERAL OBLIGATION BOND ELECTIONS FOR  
AFFORDABLE HOUSING**

- In addition to making these resources dedicated to lower-income  
households, we encourage specifically setting goals around the creation  
of units that will be available to the Continuum of Care for Permanent  
Supportive Housing and Rapid Rehousing.



### Objective III.3: LEVERAGE LOW INCOME HOUSING TAX CREDITS AND SEEK LEGISLATIVE CHANGES

- One of the most powerful tools that the City has currently with supporting developments applying for LIHTCs is through supporting the development through a City Council Resolution. The City could consider, like other Texas cities, only providing that support to properties that include a set-aside for a certain percentage of CoC units.

### Objective III.5: MAXIMIZE PUBLIC PROPERTY TO BUILD OR INCLUDE AFFORDABLE HOUSING, Action III.5.B: DEVELOP PROPOSALS, BIDS AND PARTNERSHIPS WITH OTHER PUBLIC ENTITIES WHO HAVE UNDERUTILIZED LAND

- If the City makes public land available for development, they should consider creating a priority or requirement for all or part of the units to be designated as CoC units.

### Objective III.7: UTILIZE SOCIAL IMPACT BONDS/ PAY FOR SUCCESS MODELS FOR PEOPLE EXPERIENCING HOMELESSNESS

- We appreciate the inclusion of the Pay for Success program in the Implementation Plan. We look forward to working with our partner agencies to demonstrate the successful implementation of the program and hope that it will be an example to the community of the effective use of funding.

### Objective III.8: UTILIZE THE NATIONAL HOUSING TRUST FUND

- In addition to the recommendations, ECHO encourages that the City advocate for additional changes to the National Housing Trust Fund:
  - Include prioritization of CoC units dedicated to the homeless,
  - Make the TDHCA application process easier for NHTF. Currently, applicants must use the same large, complex LIHTC application, called the Uniform Multifamily Application, for the NHTF funds, which creates a high bar of development expertise and potential expense to access these funds, and
  - Consider setting aside part of the NHTF for operating/rental expenses to serve persons experiencing homelessness without access to rental assistance.

### Objective III.10: SUPPORT EFFORTS TO PREVENT AND END HOMELESSNESS

- ECHO encourages expanding the type of housing available to persons experiencing homelessness, to include both PSH and RRH, and to be called CoC units. All CoC units need to be low-barrier, housing first units,
- CoC Units in the community should only take referrals from Coordinated Entry and would be referred by ECHO, who will ensure that tenants have the necessary rental subsidy to afford the rental unit, and the necessary voluntary services to have the support to be successful in their tenancy,
- The City of Austin needs more mission driven (usually nonprofit) developers with the capacity to develop affordable housing. The Plan should include the need to provide technical assistance to nonprofits willing and ready to do more development. This technical assistance could be in the



form of on-going training, peer to peer learning, training academies, and other tools to increase the development capacity in the community, and

- The Implementation Matrix should include an “Action” in the matrix that measures the number of CoC units created.

Action III.10.B: WORK WITH PRIVATE LANDLORDS TO ACCEPT CHRONICALLY HOMELESS RESIDENTS.

- We appreciate the attention to the need to work with Private Landlords to accept Chronically Homeless Residents, which is a priority for ECHO and our partners.
- We encourage you to add to the bulleted list:

“Negotiating lower tenant screening barriers, to include lower criminal screening criteria, and flexibility when considering rental history, credit history, and sources of income.”

Objective IV.1: ADOPT AFFORDABLE HOUSING GOALS TO GUIDE POLICY

- In addition to the 10-year targets identified in the plan, we encourage the City to track the creation of CoC units. The Blueprint sets a community goal to produce 100 PSH units per year, with half of those being Housing First. In addition to the 100 units per year of PSH, we encourage adding to the goal to be an additional 200 units per year of RRH.

Sincerely,

Ann Howard  
Executive Director