



STATE OF MICHIGAN  
MICHIGAN INTERAGENCY COUNCIL ON HOMELESSNESS  
LANSING

December 20, 2022

The Honorable Gretchen Whitmer  
Office of the Governor  
111 S. Capitol Ave.  
Lansing, MI. 48933

Dear Governor Whitmer,

The Michigan Interagency Council on Homelessness (MICH) serves in an advisory capacity for the executive branch on matters related to homeless response policy development. It is made up of representatives from state departments, the courts, and members of the general public who are striving to end homelessness in Michigan by collaborating to improve service delivery for people experiencing homelessness.

We gratefully acknowledge all the support your administration has demonstrated to increasing access to affordable housing for residents across the state. The \$50 million funding for the Housing and Community Development Trust Fund allows for the flexibility to create programs to meet new and ongoing needs. The creation of the Missing Middle program is a great step in meeting the needs for more safe and affordable housing for all Michiganders. MDHHS was appropriated \$6M in FY 23 for local providers of Permanent Supportive Housing (PSH) to enhance and improve the delivery of supportive services. Lastly, the \$10 million funding provided for homeless shelter infrastructure improvements allows shelters across the state to make critical repairs to their facilities. There are some additional ways that your administration could support efforts to end homelessness in the state. Below we outline our priorities for Fiscal Years 2023 and 2024 that would align with priorities from the Campaign to End Homelessness' 2023-2025 Action Plan. These investments will increase shelter services to homeless youth and survivors of domestic violence, provide persons experiencing chronic homelessness with access to stable housing, provide invaluable protections for renters, and increase the capacity of the homeless response system. We welcome a meeting to discuss these priorities and to start a dialogue between the Council and your policy team.

## **Increase funding for shelter and related programs**

### **Increase Funding for the Homeless Youth and Runaway (HYR) Programs (\$10 million annually)**

Michigan providers serve almost 3,100 runaway and homeless youth through its dedicated shelters and programs. They provide safe shelter and crisis intervention for homeless and vulnerable youth, despite the significant increase in operational costs due to pandemic guidelines, increased youth needs, and dramatically rising instability of essential staffing. Current program funding (\$7.78 m in GF, TANF, and Title XX) cannot ensure that every young person experiencing homelessness can access quality services anywhere in Michigan.

The requested \$10 million funding would be allocated for:

- \$6 million to cover the 18 counties that are presently unserved by any HYR program and expand the capacity for counties that are inadequately covered, such as Wayne County which has only one provider.
- \$2 million across 19 providers statewide to provide infrastructure support for expanded staff, supervision, and training to continue to meet the complex mental health needs of the population being served.
- \$2 million across 19 providers statewide to support upgrading technology and facilities to maintain safety in environments where youth are sheltered.



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Because more than half of the 19 HYR programs are licensed as Child Caring Institutions (CCI) they are held to the same staffing and caseload standards as other child residential treatment programs. This requires a higher level of programming, staffing and management. During the pandemic, several facilities had to restrict the number of beds available due to staff shortages from COVID exposure and illness, as well as hesitance to work in a residential environment where exposure risks were greater for similar levels of pay in lower risk positions. We are also requesting a dedicated FTE within the Michigan Department of Health and Human Services (MDHHS) to oversee this grant funding, coordinate between the Children's Services Agency and other connected programs reduce to youth and family involvement in child welfare and juvenile justice systems and prevent young people from entering adult homelessness.

**Statewide Expansion of Street Outreach Support (\$2 million annually)**

Each year, approximately 1,100 individuals living on the street, in tents, in cars or in places not fit for human habitation are connected to shelter, housing, behavioral health supports, and other resources for their safety and wellbeing through Michigan's Projects for Assistance in Transition from Homelessness (PATH) program and other street outreach funding. Unsheltered individuals often require a high degree of long-term engagement to successfully move them into permanent housing, and staff must address a variety of complex needs including active substance abuse, unmanaged mental health needs, and chronic physical health conditions. Federally funded through the Substance Abuse and Mental Health Services Administration (SAMHSA), Michigan receives \$1.7 million annually for street outreach services. That funding, and its associated General Fund match, covers nine outreach teams for the lower half of the lower peninsula. Because this is a formula grant, it is not possible to apply for more funding. In addition, a small number of communities across the state use other funding including HUD Emergency Solutions Grant (ESG) funds to support limited street outreach but it is not able to provide the staffing and services needed to cover the entire state and utilizing ESG funding for outreach reduces the amount available in those communities for direct housing assistance. We are asking that \$2 million be appropriated to fully expand street outreach support services across the entire state of Michigan. This will ensure that rural counties across the UP and northern lower Michigan will have skilled teams finding and supporting people living unsheltered and connecting them to housing and other resources and existing areas.

**Increase Funding for Domestic Violence/Sexual Assault Programs (\$15 million annually)**

Nonprofit domestic violence and sexual assault shelter providers have worked tirelessly in an ever-changing landscape to meet the needs of survivors who are seeking safety from abuse. Over the last few years, an increase in the demand for services and a decrease in accessible funding has created additional challenges for service provision creating an emergent crisis. In addition, existing funding has often been burdensome and unstable. It is expected that there will be a significant cut to the victim of crime act funding next year which will destabilize these programs further and force several to close- this would result in further overburdening the shelter system as well the potential for loss of life for those where shelter is no longer an option. It is essential for the State to commit to investing in domestic violence and sexual assault shelters with general fund dollars. It is important to note Michigan is the only Midwest great lakes state to provide no general funds dollars to domestic violence shelters with the average of our neighbors investing between \$10 million and \$25 million. To address the unique needs of Michigan's shelters, we recommend allocating \$15 million out of general funds to allow stabilization of domestic and sexual violence service providers. This ask is in addition to the request to allocate \$6 million of TANF funds to Domestic Violence/Sexual Assault programs. It is important to note that a TANF re-allocation while helpful would not allow programs to serve all survivors as some of those seeking help are not TANF eligible. Moreover, it is expected and essential that to ensure stability for DV programs, funding will have to come from a multiplicity of sources and constitute a significant investment to ensure success of DV/SA programs post COVID.



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**Create Emergency Shelter Program/Domestic Violence/Youth Shelter Repair Grants (\$5 million annually)**

MDHHS received more than 60 applications from shelters across the state for facility improvement funding in FY2022-FY2023. These applications requested more than \$18 million in repairs – many for basic habitability improvements including roof, window and furnace replacements. After reviewing the expansive needs among shelter providers across the state, it became evident that access to this type of infrastructure funding should be available on a regular basis. Many applications noted that a lack of access to funding that allowed these types of expenditures severely limited their ability to make necessary repairs. We are asking that \$5 million per year be appropriated specifically for shelter repairs and physical improvements for emergency shelters for singles, families, domestic violence survivors, and youth. This would have a direct and positive impact on the health and safety of thousands of adults, children and youth who access shelter across the state each year.

**Expansion of Supportive Housing Services for Persons Experiencing Chronic Homelessness**

**Increase Funding for Supportive Housing Services (\$20 million annually)**

In 2021, statewide data revealed that 3,415 households experienced chronic homelessness, meaning they have a disabling condition and have experienced homelessness for an extended period of time. Supportive Housing (SH) is proven to end the cycle of chronic homelessness, improve lives, and save money for systems in which this population is over-represented, including high-cost health systems and justice systems, by connecting households to affordable housing with tenant-centered, flexible services. Currently, funding for SH supportive services is limited and often a braided mix of federal Continuum of Care funding, local government funding such as CDBG, and on a limited scale local philanthropy resources. With the recent influx of federal housing resources through pandemic relief funds, there is an opportunity to continue to reduce chronic homelessness in Michigan. Maintaining housing stability for this vulnerable population requires a sustained investment in supportive services. Building off the \$6 million investment provided in FY23, a \$20 million funding commitment to MDHHS for Supportive Services over a three-year period would serve approximately 1,025 additional households. While there currently exists an opportunity within the Behavioral Health carve out of the Michigan Medicaid State Plan's 1115 demonstration waiver for some supportive services to be reimbursed by Medicaid for eligible clients, this resource is limited to only individuals eligible for and currently receiving behavioral health services. There is a gap in coverage for those individuals who need supportive housing supportive services but are not actively receiving Behavioral Health services through Medicaid.

**Implement More Robust Tenant Supports and Protections**

**Create Emergency Rental Assistance Fund (\$30 million annually)**

In the 2 ½ years since the onset of the Covid pandemic, many Michiganders lost their primary source of incomes via employment, became ill, lost their jobs, or had to drop out of the workforce due to health of family members or needing to be home for childcare/remote education. Emergency rental assistance became a critical resource that kept Michiganders stable in their housing and paid for needed utilities. With the expiration of the eviction moratorium and expenditure of the ERA funding in MI evictions are once again increasing, along with requests for State Emergency Relief. MSHDA is rolling out a Homeless Prevention Program using HOME ARP (\$5 million) statewide, targeted at those at risk of homelessness providing rental and utility assistance. It is estimated that the need is far greater. According to UM Poverty Solutions Nov. 11, 2022 policy brief 'Learning from Covid-19 Eviction Response measures in Detroit', "Filings increased since the lapse of state and local moratoria, rising to 75% of the pre-pandemic level in 2022 as protections waned. At the current filing rate, 21% of Detroit renters (61,000 tenants) will face the threat of eviction this year."



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**Implement Right to Counsel for Full Statewide Civil Eviction Representation (\$50 million annually)**

The National Coalition for Civil Right to Counsel reports that in July 2022, a national average showed 3% of tenants were represented by counsel in eviction cases and landlords were represented 82% of the time. According to a 2020 study by Eviction Lab property owners disproportionately threaten Black and Latinx renters—particularly women—with eviction, and that filing and eviction rates were, on average, significantly higher for black renters than for white renters.. Many studies have been conducted on right to counsel cost benefits. Every report found that cities and states will save far more than they spend to provide such a right, due to avoided costs around shelters, health care, foster care, and other social safety net services. Legal Aid services proved essential to provide representation to tenants in civil eviction proceedings during the pandemic, countering the power imbalance between landlords and tenants in these matters. The CERA funding for Legal Aid was in the range of \$8-9M and provided roughly 20% coverage statewide. A sustained investment in continuing these protections will enable tenants to be represented in eviction cases and have their rights protected in situations where there are threats to terminate tenancy, often without cause.

**Create a Rental Housing Partnership Trust Fund (\$5.25 million one-time)**

The Rental Housing Partnership Trust Fund (RHPTF), which is also being promoted by the Michigan Poverty Taskforce, will manage a Statewide Rental Housing Partnership Council. The RHPTF Council will be composed of stakeholders including tenants, landlords, persons with lived experience (homelessness), property management companies, developers, county and local government, court systems, human service providers and funders (e.g., CoCs, MDHHS, MSHDA, etc.), and subject matter experts. The RHPTF will pursue the creation and implementation of various tools developed to address a range of issues adversely affecting rental households and housing availability, including a Landlord Risk Mitigation Fund. Functions of the RHPTF will be to foster and guide constructive dialog, conduct collaborative problem-solving, provide training, technical assistance and support between and on behalf of, residential housing tenants and landlords.

**Additionally, we urge your administration to consider supporting a handful of important legislative efforts that would make it easier for tenants to obtain and maintain housing. These include:**

**Support Source of Income Protection Legislation**

Source of Income protections refers to combating the practice of refusing to rent to a housing applicant because of that person’s lawful form of income. Often the denial of housing will serve as a pretext for a prohibited form of discrimination and disproportionately affects renters of color, women, and persons with disabilities. As a result, source of income (SOI) discrimination contributes to the perpetuation of racially segregated communities and neighborhoods with concentrated poverty. As of January 2022, nineteen states and the District of Columbia, as well as many municipalities have passed source of income laws. Michigan has had Source of Income legislation introduced in 2019 in the MI House and in 2021 in the House and Senate that failed to garner a committee hearing and did not make it to the floor for a vote. Plans are for a slightly revised version of Source of Income protection legislation to be introduced in the 2023 session, amending the MI Elliot Larsen Civil Rights Act. We urge your administration to work with the legislature to pass this legislation in 2023.

**Support Just Cause Eviction Legislation**

Just cause evictions— also known as “good cause” or “for cause” – eviction laws are tenant protections that prevent evictions and promote housing stability by limiting the causes for which a landlord can evict a tenant or refuse to renew a tenant’s lease when the tenant is not at fault or in violation of any law. Just cause laws aim to benefit low-income tenants by:

- Protecting renters from evictions for no fault of their own.
- Delivering a sense of stability to tenants.
- Discouraging renters from self-evicting when they receive eviction notices from landlords.



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- Empowering tenants experiencing poor living conditions, discrimination, or other illegal landlord behavior to advocate for improvements with landlords or file complaints without fear of retaliation.
- In some cases, protecting tenants from unreasonable rent increases.

The specific protections embedded in just cause legislation vary by jurisdiction. Protections always include provisions that define the legal causes for which a landlord can evict a tenant or refuse to renew a tenant's lease. Legal definitions of "just cause" usually involve substantial violations of a lease by a tenant, such as failure to pay rent or destruction of property. If a tenant receives an eviction notice without just cause, the tenant can challenge the eviction in court. While no legislation has been introduced to date, we urge your administration to work with the legislature to pass this legislation in 2023.

### **Expansion of SSI/SSDI Outreach, Access, and Recovery (SOAR)**

#### **Increase funding for SOAR (\$2 million annually)**

SSI/SSDI Outreach, Access and Recovery (SOAR) is a model designed to assist children and adults in applying for Social Security disability benefits, including those returning to their communities from jails and hospitals. SOAR-trained case managers provide comprehensive SSI/SSDI application assistance for eligible individuals who are experiencing or at risk of homelessness. During this process, they also keep in contact with the applicant, the Social Security Administration (SSA) field offices, and Disability Determination Services (DDS) to facilitate questions and provide supporting documentation. Between July 1, 2021- June 30, 2022, Michigan adjudicated 134 Initial SOAR claims. Three-quarters of those claims were approved (75%) and more than \$1.1 million in benefits and backpay were awarded. Applications were completed and submitted by 41 Certified SOAR Practitioners and applicants received a decision on average within 138 days. This highly successful program currently relies on non-profit organizations who volunteer their staff time to work with individuals through the application process. Unfortunately, without dedicated SOAR staff, Michigan cannot expand this program to increase its reach. Diligent recruitment and training of new SOAR practitioners over the past 36 months has resulted in a significant increase in the number of practitioners but very little increase in the number of completed applications. This is due to the 40 hours or more it takes to complete a single application. We are proposing that with an appropriation of \$2 million, 15 full time SOAR practitioners and administrative support could be hired to complete applications across Michigan and augment current SOAR efforts. Other successful states including Pennsylvania, Virginia and Connecticut have invested in full time SOAR staff which has helped them to be some of the most productive SOAR programs in the country ([2022 SOAR Outcomes \(samhsa.gov\)](https://www.samhsa.gov/2022-soar-outcomes)).

Respectfully,

Kelly Rose  
Chair, Michigan Interagency Council on Homelessness