



Veterans Housing and Homelessness Prevention Program Proposed Program Framework PUBLIC COMMENT DRAFT

1. Summary and Proposed Implementation Timeline

Chapter 727, Statutes of 2013 (AB 639, Pérez) restructured the Veteran’s Bond Act of 2008 authorizing \$600 million in existing bond authority to fund multifamily housing for veterans. Proposition 41, the [Veterans Housing and Homelessness Prevention Bond Act of 2014](#) approved by California voters on June 3, 2014, authorizes \$600 million in state general obligation bonds to fund affordable multifamily rental, supportive and transitional housing for veterans pursuant to AB 639 through the Veteran Housing and Homeless Prevention (VHPP) Program. After setting aside funds for bond issuance costs, default reserves, and program administration, approximately \$545 million is available for development assistance and operating subsidies, over the next several years.

The Department of Housing and Community Development (HCD), in collaboration with the California Housing Finance Agency (CalHFA) and California Department of Veterans Affairs (CalVet) [hereafter referred to as the Agencies], is in the process of designing, developing, and administering the VHHP Program pursuant to AB 639 and Proposition 41.

The Agencies expect to be able to offer approximately \$75 million in the Fall of 2014 through a competitive Notice of Funding Availability (NOFA) process. The proposed implementation plan for the design, implementation and release of the initial NOFA is detailed below. Additional information on the Program design and implementation is available on the [VHHP Program website](#).

Stakeholder Outreach on Program Design	July 2014
Stakeholder Outreach on Draft Program Guidelines	September 2014
Release Final Program Guidelines, 2014 NOFA and Application	November 2014
NOFA Workshops	November/December 2014
Anticipated Application Due (2014 NOFA)	March 2015
Anticipated Award Date	June 2015

2. VHHP Program Goals

- Provide for the acquisition, construction, rehabilitation, and preservation of affordable multifamily Supportive Housing, affordable Transitional Housing, affordable rental housing or related facilities for veterans and their families to allow veterans to access and maintain housing stability (Military and Veterans Code § 987.002(a)).

- Establish and implement programs that focus on veterans at-risk for homelessness or experiencing temporary or chronic homelessness (Military and Veterans Code §987.005(a))
- Ensure at least 50 percent of funds awarded will provide housing to veteran households with extremely low-incomes. At least 60 percent of units will target extremely low- income households and shall be Supportive Housing. (Military and Veterans Code § 987.005(b) and 987.005 (b)(2)).
- Prioritize projects that combine housing and supportive services, including, but not limited to job training, mental health and drug treatment, case management, care coordination, and physical rehabilitation (Military and Veterans Code § 987.005(a)(2)).

3. Agencies' Collaboration Efforts

Since the Fall of 2013, upon passage of AB 639, the Agencies have worked together to understand Veteran needs, resources and gaps to inform the VHHP Program Framework. These efforts have consisted of a combination of data collection efforts, reviewing industry resources, interviews with industry professionals and key policy stakeholders (including local and U.S. Department of Veterans Affairs (VA), housing authorities, United States Interagency Council on Homelessness (USICH), U.S. Department of Housing and Urban Development (HUD), Continuum of Cares (CoCs), veteran service agencies/providers, affordable housing developers, mainstream service providers and supportive service consultants). Much information has been collected related to barriers, opportunities and trends which will inform a more targeted, impactful and sustainable program. The Agencies will continue to work collaboratively in the design and implementation of the VHHP Program.

4. 2014 NOFA and Future Funding Rounds

The Agencies anticipate offering approximately \$75 million in the Fall of 2014 through a competitive NOFA process. The VHHP Program framework details proposed programmatic design requirements and priorities for the initial 2014 NOFA. In subsequent funding years, these requirements and priorities could be modified, based on program experience and evolving needs, resources and gaps.

5. Draft Program Framework and Opportunities for Public Comment

This document describes a proposed framework for the overall multi-year program implementation, as currently envisioned by the Agencies. The purpose of this draft framework is to outline the Agencies preliminary thoughts on program design as a way to solicit public comment on VHHP Program design and implementation and in preparation for the development of more detailed program guidelines.

The Agencies will accept comments on the Draft VHHP Program Framework from July 7 to July 23, 2014. Comments on the Draft Program Framework will be accepted through stakeholder meetings scheduled in six locations statewide as detailed below. The Agencies will be taking a record of verbal comments received during these stakeholder sessions. Written comments may also be submitted to the Department using the online [Public Comment Form](#) prior to the end of the public comment period. ***Areas where comments would be especially appreciated are noted in italics and underline.***

VHHP Program Stakeholder Meetings		
Date/Time	City	Location
July 10, 2014 10:00 a.m.	Oakland	Elihu M. Harris Building (Auditorium) 1515 Clay Street, Oakland, CA 94612
July 14, 2014 1:30 p.m.	Riverside	California Tower (Highgrove Suite 200) 3737 Main Street, 2nd Floor. Riverside, CA 92501
July 15, 2014 10:00 a.m.	San Diego	CA State Office Building (Room B109) 1350 Front Street San Diego, CA
July 16, 2014 10:00 a.m. and 2:30 p.m.	Los Angeles	Van Nuys State Office Building (Auditorium) 6150 Van Nuys Blvd, Van Nuys, CA 91411
July 21, 2014 2:00 p.m.	Sacramento	HCD Headquarters (Room 402) 2020 W. El Camino, Sacramento, CA 95833
July 22, 2014 10:00	Santa Ana	Rancho Santiago Community College District Office (Room 107) 2323 N. Broadway, Santa Ana, CA 92706

6. Geographic Distribution

As detailed in Appendix A, Veterans who are experiencing homelessness and/or have extremely low incomes and are in need of housing can be found throughout California. Large concentrations of veterans experiencing housing instability, however, are limited to a few regions within the State. To encourage the development of housing within these regions and ensure that none of these regions are left out, the Agencies propose to set minimum funding levels for each of the regions identified below based upon: Count of people experiencing homelessness for which statewide data is publically available (2013); and the number of extremely low-income households paying more than 50 percent of income on housing. Extremely low-income households paying more than 50 percent of income on housing is used here as a proxy for identifying veterans who are at-risk of homelessness.

The following chart represents the proposed minimum allocation for each of the identified regions based on a calculation of the two factors identified above. Similar to HCD's Multifamily Housing Program (MHP), the Agencies propose setting minimum funding levels at 75 percent of the distribution calculated using these measures. Each region would receive a minimum funding level consistent with 75 percent of the weighted allocation as identified in Column G below. The minimum allocations for the four identified regions total \$43,717,445. The remaining \$31,282,555 of the approximately \$75 million in funds available under the 2014 NOFA will be available to fund projects statewide, including projects in the regions with set asides.

The Agencies intend to fully award approximately \$75 million under the 2014 NOFA and propose that un-awarded funds remaining within any regional minimum allocation be rolled over to fund projects statewide within the designated NOFA.

VHHP Program Geographic Distribution of Funds						
	A	B	C	D	E	G
	Veteran PIT Count	PIT Count (% of State Total)	ELI Renters with Severe Cost Burden	ELI/Cost Burden (% of State total)	Percentage Share Equal Weight of PIT + ELI/Cost Burdened	Minimum Funding Level
Total Allocation Available						\$75,000,000
					= Column B +D/2	=(Column E * \$75million)*.75
Bay Area Region <i>Counties: San Francisco, Alameda, San Mateo, Santa Clara, Sonoma and Santa Cruz</i>	2,966	0.20	136,800	0.16	0.18	\$9,915,263 (13%)
Los Angeles County	6,902	0.45	321,340	0.37	0.41	\$23,170,163 (31%)
Inland Empire/ Orange County <i>Counties: Orange, Riverside and San Bernardino</i>	915	0.06	122,515	0.14	0.10	\$5,653,483 (8%)
San Diego County	1,486	0.10	68,875	0.08	0.09	\$4,978,536 (7%)

7. Definitions

Homeless Definitions

Note: The definitions for Homeless and Chronically Homeless are paraphrased. Full definitions can be found in the [Federal Code](#).

“Homeless” also referred to as “Experiencing Homelessness”, includes the following four general categories of homeless persons as defined in the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 and found in the Title 42 of the United States Code:

- Category 1: “Literally Homeless” means the individual or family lacks a fixed, regular, and adequate nighttime residence, or identifies his or her primary residence as a shelter, welfare hostel, transitional or temporary housing facility, or public or private place not designated for, or ordinarily used as, a regular sleeping accommodation. People are also considered literally homeless if they are exiting an institution where they resided for up to 90 days and were in emergency shelter or a place not meant for human habitation immediately prior.
- Category 2: “Imminent Risk of Homelessness” means the individual or family will lose their primary nighttime residence, which may include a motel or hotel or a doubled up situation, within 14 days (with specified documents such as court order resulting from eviction action), have no subsequent residence identified, and lack resources to obtain permanent housing.

- Category 3: “Persistent Housing Instability” means families with children or unaccompanied youth who are unstably housed and expected to continue in that state. Unstably housed means the households have not had leases in their name in the last 60 days or more, have two or more moves in the last 60 days, and who are likely to continue to be unstably housed because of disability or multiple barriers to housing.
- Category 4: “Persons fleeing or attempting to flee domestic violence” means an individual or family who is fleeing, or is attempting to flee, domestic violence, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual’s or family’s primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence. The individual or family has no other residence; and lack the resources or support networks to obtain other permanent housing.

Two additional categories of households experiencing homelessness are further defined for application scoring purposes to enable effective targeting of Supportive Housing resources and the use of a VHPP Program Operating Subsidy (VOS).

“Chronically Homeless” or “Experiencing Chronic Homelessness” means an individual veteran or family with an adult veteran with a disabling condition who has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last three years. The adult head of household can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability.

“Veteran with a Disability Experiencing Homelessness” for the purposes of the VHPP Program means veteran individuals or households who are literally homeless (Category 1 under Homeless definition) with a disabling condition as defined in “Chronically Homeless”, but who does not meet the criteria of having been homeless for at least one year or on at least four separate occasions in the last three years.

Question: The theory behind calling out Veterans with a Disability Experiencing Homelessness is that this is a subset of the homeless population that needs housing linked to intensive services, but that fails to meet the strict test of Experiencing Chronic Homelessness as defined above. 1) Is this general theory valid? What evidence supports it, or suggests that it is not valid? 2) If the general theory is valid, is there a better way to define the population, to limit it those who truly need services? 3) Is creating this category helpful for providing access for homeless veterans with disabilities?

Housing and Other Definitions

“Supportive Housing” means housing with no limit on length of stay, that is occupied by the target population, and that is linked to onsite or offsite services that assist the Supportive Housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community (Health and Safety Code 50675.14). “Target Population” means persons, including persons with disabilities, and families who are “homeless,” as that term is defined by Section 11302 of Title 42 of the United States

Code, or who are “homeless youth,” as that term is defined by paragraph (2) of subdivision (e) of Section 11139.3 of the Government Code.

“Transitional Housing” means buildings configured as rental housing developments, but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months. (Health and Safety Code 5055.2 as referenced in VHHP statute).

“Veteran” means any person who served in the active military, naval, or air service of the United States, or as a member of the National Guard who was called to and released from active duty or active service, for a period of not less than 90 consecutive days or was discharged from the service due to a service-connected disability within that 90-day period. This also includes veterans with less-than-honorable discharges.

8. Priority and Eligible Projects

The Agencies recognize the urgent need to reduce the number of veterans experiencing homelessness in California and the emphasis of the authorizing legislation on Supportive Housing for extremely low-income Veterans experiencing homelessness. Current federal policy and funding opportunities are aimed at reducing veteran homelessness through permanent housing interventions, including permanent supportive housing and rapid re-housing interventions. Additionally, significant national efforts are underway that are engaging many California communities, including the Mayor’s Challenge to End Veteran’s Homelessness, the 25 Cities Working Together to End Veteran and Chronic Homelessness Initiative, and the 100K Homes/Rapid Results 2013 Veteran Bootcamps.

To best complement these initiatives, the Agencies propose to prioritize funding available in the 2014 NOFA for Supportive Housing projects that serve Veterans Experiencing Homelessness, with additional points if serving Veterans Experiencing Chronic Homelessness or Veterans with a Disability Experiencing Homelessness. Because maximum points for these populations will be capped at 50 percent of VHHP Program-assisted units, mixed population projects, serving veterans up to 60 percent Area Median Income (AMI) will not be disadvantaged.

While Transitional Housing projects are eligible under this NOFA, the initial 2014 NOFA prioritizes permanent Supportive Housing. In addition to meeting the Supportive Housing goals in the VHHP Program, this initial prioritization recognizes the ongoing shifts in both federal policy and financial support of transitional housing. In a recent Office of Special Needs Assistance Programs (SNAPs) [Weekly Focus](#), HUD noted that while it appears transitional housing may be an appropriate intervention for some homeless populations, households with disabilities that need long-term assistance likely do not need an interim stay in transitional housing waiting for placement into Supportive Housing. Additional information on federal priority for the Chronically Homeless was the subject of a second [Weekly Focus](#) article. Looking toward future VHHP Program NOFAs, the Agencies intend to monitor both the federal direction and the assessments that local homeless systems are making in aligning their transitional housing programs.

Question: The Agencies would appreciate feedback on innovative transitional programs and efforts incorporating transition-in-place mechanisms or in addressing long-term financial sustainability of the approach.

For the 2014 NOFA, the Agencies propose the following:

1. To be eligible, projects will be required to restrict at least 50 percent of their VHHP Program-assisted units to extremely low-income veterans and their families.
2. The 2014 NOFA will prioritize projects where at least 25 percent of the VHHP Program-assisted units qualify as Supportive Housing (and where at least five such units are included). Projects that further target Supportive Housing units to Veterans Experiencing Chronic Homelessness or Veterans with a Disability Experiencing Homelessness will receive additional consideration in scoring, with points maximized when targeted units are 50 percent of total VHHP Program-assisted units.
3. VHHP Program Operating Subsidies (VOS) will be limited to Supportive Housing projects requesting Development Funds and serving Veterans Experiencing Chronic Homelessness or Veterans with a Disability Experiencing Homelessness. The VOS may be used to fill the financial gap between the costs of operating the proposed project and 30 percent of tenant's adjusted gross income.
4. Development funding will be available for units restricted by the VHHP Program, with income limits up to 60 percent AMI, and allowing pairing with either nine and four percent tax credits or other State and local affordable housing resources (i.e. projects with no tax credits). To encourage use of 4 percent tax credits, and thereby maximize overall affordable housing production, the application scoring system would reward projects not using nine percent credits.

VHHP Program Funding Priorities				
	Eligible for VOS	Priority Points in Scoring Criteria	Qualifies as Supportive Housing	Service Plan Requirements
Supportive Housing for Veterans Experiencing Chronic Homelessness	YES	Yes, most points	YES	Full Plan
Supportive Housing for Veterans with a Disability Experiencing Homelessness	YES	Yes, but fewer than Chronically Homeless targeting	YES	Full Plan
Supportive Housing for Veterans Experiencing Homelessness	NO	Yes, but least within supportive housing	YES	Services Coordination Plan
Permanent or Transitional Housing for Veterans (up to 60 percent AMI)	NO	NO	NO	Services Coordination Plan

9. Eligible Project Sponsors and Development Team Experience

California has a large group of experienced affordable housing developers with proven track records in accessing tax credits and other resources. The Agencies propose to target the VHHP Program towards these developers. At the same time, it is recognized that serving homeless veterans requires specialized expertise and familiarity with veteran culture and

disabilities common among veterans, as well as with federal, state, and local programs and services for Veterans. The Agencies, therefore, propose that development team experience will be considered both as a threshold requirement and in the scoring criteria (see Section 16 for additional information).

10. Occupancy and Rent Restrictions

Occupancy of all VHHP Program-assisted units will be restricted exclusively to Veterans and household members. Occupancy in Supportive Housing units would be restricted to a Veteran (and household members) who are Experiencing Homelessness, Experiencing Chronic Homelessness or are Veterans with a Disability Experiencing Homelessness for a period of 55 years. If, after a number of years, there are no longer veterans within these populations in the area of the project, this requirement could be modified.

Rent will be restricted to 30 percent of the applicable income limit, following normal Tax Credit Allocation Committee (TCAC) and HCD's MHP rules. Rents in Supportive Housing units receiving a VOS will be restricted to 30 percent of the tenant's actual income.

11. Eligible Use of Funds

A. Development Funds

Development Funds may be used as a permanent take-out source. Development Funds may only be used for costs associated with the VHHP Program-assisted residential units and a proportionate amount of the common areas and services space linked to the tenants of the VHHP Program restricted residential units.

The following activities are eligible for Development Funds:

- Acquisition of land and improvements;
- Acquisition of vacant buildings which do not require permanent relocation;
- Hard and soft costs associated with new construction or acquisition/rehabilitation including accessibility modifications to address the population being served; and
- Reimbursement for acquisition and predevelopment costs previously paid by the applicant.

The following activities are NOT eligible for Development Funds:

- Costs associated with non-VHHP Program-assisted units and proportionate amount of the common areas and services space;
- Gap financing for projects in occupancy or having commenced construction prior to the date of the application;
- Supportive Services;
- Refinancing only; and
- Equity cash out payments for appreciated equity through transfers or syndication between related parties.

Questions: 1) The Agencies are considering allowing disbursement of Development funds during the construction period. What is the financial value of allowing disbursements during construction? 2) Should VHHP Program funds be available to supplant other committed, publicly funding financing sources for an otherwise fully funded project if there is a new commitment to providing units for targeted veteran populations?

B. VHHP Operating Subsidy (VOS) Funds

The following activities are eligible for the VOS:

- Operating subsidy in Supportive Housing projects when targeting Veterans Experiencing Chronic Homelessness or Veterans with a Disability Experiencing Homelessness in conjunction with a Development Fund loan.

The Agencies propose patterning the VOS after the MHSA Capitalized Operating Subsidy Reserve (COSR). While the VOS may assist units serving Veterans Experiencing Chronic Homelessness or Veterans with a Disability Experiencing Homelessness, the Agencies anticipate that the VOS sizing and tenant income assumptions will be different for each population.

As VOS is an eligible use only in conjunction with Development Funding, the Agencies propose that the Development Funds requested be equal or exceed a set percentage of the total VHHP request (i.e. 50 percent development loan with 50 percent VOS).

12. Assistance Terms

A. Development Funds

The Agencies propose to structure the Development Funding as residual receipt loans, with small required payments to cover long-term monitoring costs, similar to the Mental Health Services Act Housing Program ([MHSA](#)) and [MHP](#). In addition, per-unit loan limits will be established based on affordability restriction level, location, unit size, project type (i.e. Supportive Housing) and whether the project is accessing four or nine percent tax credits (or no tax credits), following the formula similar to that used under MHP. A per project loan limit will also apply. VHHP Program per-unit and per-project loan limit recommendations will be rolled out during the second round of stakeholder meetings scheduled for September 2014. Eligible costs would be limited to those attributable to the VHHP Program units, and include the cost categories similar to MHSA and MHP. Underwriting standards would also be similar to MHSA and MHP rules.

B. VOS Funds

To maximize unit production, the Agencies propose an application and scoring process that strongly encourages obtaining long-term operating/rental subsidies from other sources, such as HUD VASH and project-based Housing Choice Vouchers. Given that these resources are limited and not available for all Veterans; current thinking is to offer a VOS only to Supportive Housing units serving veterans which are Chronically Homeless or Veterans with a Disability Experiencing Homelessness in projects assisted with VHHP Program Development Funding. The VOS would cover the difference between 30 percent of tenant's adjusted gross income and the costs of operations, reserve deposits and would be

sized to last for at least 15 years. The Agencies will hold and control the VOS and make periodic disbursements.

Question: Should alternative operating subsidy structures be considered (i.e. flat rents or rents that taper over time)? What assumptions should be considered for tenant income (i.e. Chronically Homeless and Homeless with a Disability)?

13. Supportive Services

Most appropriately targeted to families or individuals who require intensive and ongoing support to exit homelessness and maintain housing stability, Supportive Housing will support their formerly homeless tenants with voluntary, individualized, and flexible services (i.e., service participation is not a condition of tenancy) designed to help them stay housed, and to build the necessary skills to live as independently as possible. Services should be linguistically and culturally appropriate, recognizing the culture and experiences shared by veterans. All applicants will be required to prepare a services plan that is appropriate for the population(s) served. Projects with mixed tenant populations will be required to meet the needs of all tenants who need these services to achieve and maintain housing stability (likely through a resident services coordinator). Projects not serving Veterans Experiencing Chronic Homelessness or Veterans with a Disability Experiencing Homelessness will be required to prepare a service coordination plan.

The service plan should describe the scope of on-site services for tenants, the staffing plan and a plan for how the services will be delivered and funded.

Service plan elements include:

- Assessment of anticipated needs of tenants;
- Resident selection policy and referral sources;
- Coordination and case management services that will be provided, including a description of outreach and engagement services and partner provider relationships;
- Staffing, including number of staff onsite and offsite, staff disciplines, experience and supervision;
- Budget; and
- Outcomes.

Good supportive services planning will be required to pass threshold review and will be a major component in determining project selection in scoring. See Project Selection Criteria on page 14 for additional information on service plan threshold requirements. Projects selected for funding will be conditioned on improvements to services plans, on final agreements with all providers and for final confirmation that services and providers are in place.

Attributes of a strong service plan should include:

- Data on the target population, research on their needs and a service plan that addresses identified needs;
- Provision of minimum and enhanced services, adequately described and with appropriate partners committing to provide those services and a transportation plan for off-site services;
- Use of evidenced-based service delivery models such as Critical Time Intervention, Motivational Interviewing, Trauma-Informed Care, SOAR, or others;
- Identification of a lead service provider experienced in providing services in permanent supportive housing for the population and appropriate partner service providers, including the VA, with commitments in writing to provide services and coordinate referrals;

- Written policies related to payment of rent by residents during periods of in-patient treatment, privacy and confidentiality of residents, initial and periodic staff training; safety and security of staff and veterans, approach toward drug use (including steps to deal with relapsing veterans to ensure their ability to remain in housing), and grievance procedures;
- A property management plan in sync with the service plan in such areas as resident outreach and selection, eviction prevention, and reasonable accommodation; and coordination with service providers; and
- Commitment to specific measurable outcomes with appropriate data sources identified.

Minimum and Enhanced Services

All projects will be required to provide the following minimum services to residents, either directly or through formal agreements with other agencies:

- Intensive on-site case management to engage with each veteran and jointly develop a housing stabilization and service plan;
- Tenancy supports, including basic household budgeting, review of rights/responsibilities, unit upkeep, and support adhering to other tenancy expectations and lease requirements;
- Benefits counseling and advocacy including system navigation at the VA, for eligible tenants and for mainstream resources;
- Mental health care, such as assessment, crisis counseling, individual and group therapy, and support groups;
- Physical health care, including access to routine and preventative health and dental care;
- Substance abuse services, such as treatment, relapse prevention, and support groups; and
- Transportation plan/assistance for offsite services.

Applicants are also strongly encouraged to provide enhanced services, either directly or through agreements. Enhanced services may include:

- Educational services, including assessment, GED, and school enrollment;
- Employment services, such as job skills training, job readiness, job development and placement, and job retention services;
- Linkage to potential out-placements should such placements become appropriate alternatives for current tenants, either because the veteran requires a higher level of care (i.e., residential treatment facilities and hospitals) or no longer requires permanent supportive housing (i.e. other affordable housing or market rate housing);
- Life skills training, such as household maintenance, nutrition, cooking, and laundry;
- Representative payee;
- Money management and budgeting;
- Peer advocacy;
- Legal assistance;
- Medication management;
- Attendant care;
- Adult day care;
- Child care (if applicable);
- Children's services (if applicable);
- Parenting education (if applicable); and
- Social and recreational activities.

14. Property Management Practices

Federal agencies, including the VA, HUD and the USICH are encouraging communities and housing and services providers to implement evidenced-based Housing First approaches.

Housing First practices provide housing as quickly as possible with supportive services as needed and without prerequisites for abstinence, psychiatric stability or completion of treatment programs and with flexibility around criminal backgrounds, rental history, and income history. Property management practices must employ Housing First selection and retention practices to help ensure that the housing program reaches and is effective for the population served.

Management practices related to screening, retention and coordination with service providers should be included in the services plan (and should also be reflected in the Property Management Plan at loan closing). Best practices can be found in USICH's [Housing First Checklist: A Tool for Accessing Housing First in Practice](#) and [Implementing Housing First in Permanent Supportive Housing](#).

Best Practices include:

- Tenant selection practices that:
 - Promote the acceptance of applicants regardless of their sobriety or use of substance, completion of treatment and participation in services;
 - Seldom reject on the basis of poor credit or financial history, poor or lack of rental history, minor criminal convictions, or behaviors that indicate a lack of housing “readiness”;
- Management practices that promote tenant retention such as giving tenants reasonable flexibility in paying their share of rent on time where the use of alcohol or drugs is not considered, in and of itself, a reason for eviction;
- Assisting applicants and tenants in making reasonable accommodation requests in coordination with the service provider;
- Availability of on-site property management, such as front desk enhancement or 24-hour on call staff; and
- Coordination and communication between property management staff and services staff, including coordination of property management services with case management and other services and property management promotion of case management and other services.

15. System and Community Level Coordination

Significant federal and local efforts are underway to end veteran homelessness. Key federal policy and investment strategies include:

- Establishing the goal of ending veteran homelessness by 2015 in “Opening Doors”, the federal strategic plan and the VA five-year plan to end veteran homelessness;
- Increasing investment in programs such HUD VASH and Supportive Services for Veteran Families (SSVF) in communities with the highest need and prioritizing persons experiencing chronic homelessness for HUD VASH and other permanent supportive housing;
- Promoting the use of reliable data on veteran homelessness such as the Point-in-Time homeless count, the VA Gaps Analysis Data, data collected through Homeless Management Information Systems (HMIS) for the CoCs, the VA Homeless Registry and the VA Homeless Management Evaluation System (HOMES);
- Identifying Homeless Program Coordinators at the VA Medical Center (VAMC) level and Network Homeless Coordinators and homelessness plans at the Veterans Integrated Service Network (VISN) level and implementing VISN strategies to end veteran homelessness;
- Incentivizing and supporting local ownership of the goal of ending veteran homelessness through support of local campaigns such as the 100k Homes Bootcamps; 25 Cities Initiative, and the Mayor’s Challenge;
- Focus on implementing Housing First approaches within federally-funded housing programs by federal agencies, including the VA, HUD and USICH. Housing First is a proven method of ending all types of homelessness and is the most effective approach to ending chronic homelessness;

- Through McKinney-Vento funding and the CoCs, requiring community led coordinated assessment and intake systems to ensure effective resource targeting; and
- Forming partnerships to increase access to mainstream housing and stabilization services, including for veterans and family members who are not eligible for VA benefits.

Supportive Housing projects are highly encouraged to coordinate with local efforts to reduce veteran homelessness and housing instability. In coordinating with agencies such as the VA, HUD and CoC agencies, applicants should seek to understand local veteran needs and existing resources within the community and to understand how the project can help to address the most critical and documented community needs and gaps. Applicants should also understand where their local CoC is in establishing a coordinated assessment system and whether the project can participate; if such systems are not currently operational, applicants should plan to connect their projects to such local systems in the future. Absent a local system, projects should develop proactive approaches to identify, engage and house homeless veterans with the highest level of need for Supportive Housing and connections with other veteran programs and agencies for its affordable components.

Relevant Resources and Documents

[“Opening Doors Federal Strategic Plan to Prevent and End Homelessness,”](#) United States Interagency Council on Homelessness, 2013.

[“Ending Homelessness Among Veterans,”](#) United States Interagency Council on Homelessness,” February, 2013.

[“Housing First Implementation Brief,”](#) U.S. Veterans Administration and Veterans Administration’s National Center on Homelessness among Veterans, April 2014.

[“Resources to Assist Communities in Ending Homelessness Among Veterans,”](#) U.S. Department of Housing and Urban Development, OneCPD Resource Exchange.

16. Project Selection Criteria

The Agencies plan to select projects using a competitive scoring system, with a fixed application due date.

Threshold Review and Minimum Point Score

Applications will be evaluated to determine if they meet minimum threshold requirements. Projects must receive a minimum point score (to be determined) in order to be considered for an award. In addition to an eligible project sponsor/development team and occupancy and rent standards as detailed above, threshold requirements will include:

- Development team experience;
- Financial feasibility;
- Site control;
- Appropriateness of site and project design for the population served; and
- Need for VHHP Program funding.

In addition, to pass threshold review, the submitted service plan must include the following:

- A service plan or service coordination plan with all elements addressed;
- A formal agreement with a lead service provider with at least 24 months experience providing services in housing to the population to be served;
- Provision of minimum services (see page 9); and
- A transportation plan for off-site services.

Project Selection Criteria

The table below identifies the proposed criteria that will be used to score projects that pass the threshold review. As stated previously, for the 2014 NOFA the Agencies propose to prioritize projects that meet Supportive Housing and income targeting goals identified in the statute while not excluding projects that also include units at higher income levels (up to 60 percent AML). For example, the Agencies envision that projects which propose some portion of the assisted units for the Veterans Experiencing Chronic Homelessness, Veterans with a Disability Experiencing Homelessness or Veterans Experiencing Homelessness will score well (i.e. minimum of 25 percent with points maximized at 50 percent of assisted units in this category). Consequently, applicants with strong service plans (strong lead provider, high quality services and connections, and property management consistency) will be incentivized. Because an operating subsidy is required to reach this population, the scoring will also highly reward applicants with commitments of external sources of operating assistance, such as HUD VASH or project-based vouchers. Finally, the State is seeking to fund projects that are further along in the development process.

Scoring Category	Comments	
Development Team Experience	Points will be awarded for the development team's experience developing and operating affordable, rent-restricted housing projects with populations similar to the one proposed as follows:	
	Developer	Points will be awarded on a sliding scale for the number of affordable, rent-restricted housing projects developed during the last 10 years as either a lead or joint developer.
	Owner/General Partner	Points will be awarded on a sliding scale for experience of the managing general partner or equivalent with affordable, rent-restricted projects serving special needs or homeless populations over the last 10 years.
	Property Manager	Points will be awarded on a sliding scale for property management company experience with affordable, rent-restricted units serving special needs or homeless populations or with managing housing for veterans, or both.
	Lead Service Provider	Points will be awarded on a sliding scale for experience of the lead service provider in providing intensive case management and similar services to homeless and chronically homeless populations in housing or in providing such services in housing to veterans, or both.
<p><u>Question: For any of these entities, to what extent should the Agencies require or encourage specific experience with veterans as a distinct group, in addition to experience serving them as part of the general homeless population?</u></p>		

<p>Extent Project Includes Supportive Housing Units and Targets Those Units to Subpopulations</p>	<p>Applicants will receive points for every 5 percent increment over the minimum of 25 percent of assisted units within the project that will serve Veterans Experiencing Homelessness, up to a maximum of 50 percent of total assisted units. Highest points in this category will be given for units further targeted to Veterans Experiencing Chronic Homelessness followed by units targeted to Veterans with a Disability Experiencing Homelessness.</p>
<p>Supportive Services Plan for Supportive Housing</p>	<p>Points will be based on the following:</p> <ul style="list-style-type: none"> • Lead service provider experience and capacity; • Quality and breadth of services appropriate to the homeless veteran population served; • Proximity to services (VA and other) and the transportation plan for off-site services; • Demonstrated partnerships with services programs, including services for Veterans with less-than-honorable discharges; • Consistency among services budget, staffing plan, and commitment letters/MOUs; • Percentage of annual service budget committed; and • Low barrier management practices related to tenant selection, eviction prevention, coordination with service provider.
<p>System and Community Level Coordination</p>	<p>This category will evaluate how the Supportive or Transitional Housing project contributes to the community’s plan to end veterans’ homelessness. Projects that agree to serve VA and non-VA eligible veterans (i.e. veterans with a less than honorable discharge) will also be incentivized. <u>Question: While the Agencies don’t anticipate funding projects which do not include Supportive Housing through this initial NOFA, for projects that are neither Supportive nor Transitional Housing, what should the Agencies consider in evaluating need and system level coordination?</u></p> <ul style="list-style-type: none"> • Strong documentation of coordination efforts include confirmation of needs and project support from the agencies involved in the community’s plan or efforts, such as VAMC and VA Homeless Coordinators and the CoC agency. Documentation would also include supporting data from the VA Gaps Analysis, PIT homeless count and the community’s HMIS system. <p>Additionally, this category will reward projects that identify, engage and connect chronically homeless and disabled homeless veterans with the highest level of need and provide meaningful access to the proposed project.</p> <ul style="list-style-type: none"> • Projects connected to their community’s coordinated assessment and entry system that uses a standardized method prioritizing vulnerable or high need homeless persons would be highly competitive. Absent such a system, projects that agree to use such a system once developed and demonstrate willingness to accept tenant referrals from street outreach programs, shelters, drop-in centers, and other parts of crisis response frequented by vulnerable people experiencing homelessness, such as hospitals, jails and other mainstream systems would receive fewer points.

Leverage of Development Funds	Points will be awarded on the basis of other permanent development funding as a percentage of VHHP Program funds.
Leverage of Operating / Rental Subsidies	Points will be awarded on the number of Supportive Housing units as a percentage of VHHP Program restricted units with long-term operating/rental funding such as project-based HUD VASH, project-based Housing Choice Vouchers, Shelter + Care or other local funds. Priority will be given to a project evidencing long-term operating/rental subsidies for Supportive Housing units. Please visit the following links for additional information on HUD-VASH and PHA resources and information on partnering with your PHA .
Non-9% Tax Credit Projects	Points will be awarded to non-9% TCAC projects.
Readiness to Proceed	The total score will be the sum of point awards in six sub-categories measuring readiness similar to those used in the MHP regulations (i.e. enforceable financing commitments; environmental clearances; public land use approvals; site control; local design review approvals; commitments for all deferred-payment financing, grants and subsidies).

18. Performance Monitoring and Evaluation

In addition to compliance monitoring and annual reports on demographics, occupancy, rent levels, financials and implementation of Housing First practices pursuant to the regulatory agreement, sponsors will be required to report on individual outcomes using standardized measures. These outcomes, based on [Corporation for Supportive Housing and Home for Good's Standards of Excellence for Permanent Supportive Housing](#), will be used by the sponsor and the State to 1) improve project performance, 2) report on program outcomes/results, and 3) refine the VHHP Program design. The State recognizes that population targeting may impact outcomes and reaching benchmarks. These benchmarks are not intended to dis-incentivize targeting highly vulnerable populations.

	Performance Measure	Data to be Collected/Benchmarks
Demographic Information	Characteristics of the population served in the project.	<ul style="list-style-type: none"> • Gender • Age • Disability Status • # Homeless • # Chronically Homeless • # of Individuals vs. Families Served

Housing Stabilization	<p>Tenants maintain permanent housing, either in the project or in other appropriate housing.</p> <p>In transitional housing, tenants transition to permanent housing at exit.</p>	<ul style="list-style-type: none"> • 90% maintain permanent housing at six months; or transition to permanent housing at exit (for Transitional Housing) • 85% maintain permanent housing at 1 year and ongoing • Percentage of tenants no longer in need of supportive housing and moving on to more independent housing • Percentage exiting the project not returning to homelessness • Number and percentage of tenants evicted
Access to Housing	<p>Owners provide access to supportive housing units using either a coordinated entry system or otherwise accept referrals from street outreach programs, shelters, drop-in centers, and other parts of crisis response frequented by vulnerable people experiencing homelessness, such as hospitals, jails and other mainstream systems.</p>	<ul style="list-style-type: none"> • Prior Living Arrangement • Source of Tenant Referral
Increase in Benefits, Income, or Education	<p>Tenants are assessed for eligible benefits and employment potential and gain access to mainstream services/income support and education/job training.</p>	<ul style="list-style-type: none"> • 100% assessed for eligible benefits six months of move-in (at minimum VA, SSI/SSDI, CalWORKs) • Of those eligible, 95% apply within 12 months • Of those applying, 75% receive benefits within 1 year of application • Number of veterans determined to be ineligible for VA benefits • Of the adults served, the percentage with increased employment/earned income from move-in • Number of tenants enrolling in an education or job training program
Tenant Satisfaction/ Quality of Life	<p>A standard mechanism is proposed to assess tenants' satisfaction with housing and services.</p>	<ul style="list-style-type: none"> • 80% of tenants who complete satisfaction surveys would recommend this housing to others in need

Question: Should projects serving Veterans Experiencing Chronic Homelessness, Veterans with a Disability Experiencing Homelessness and Veterans Experiencing Homelessness, even if not otherwise required, be required to enter data into the HMIS system for the CoC in which the project is located?

VHHP Draft Program Framework

APPENDIX A

California Veterans

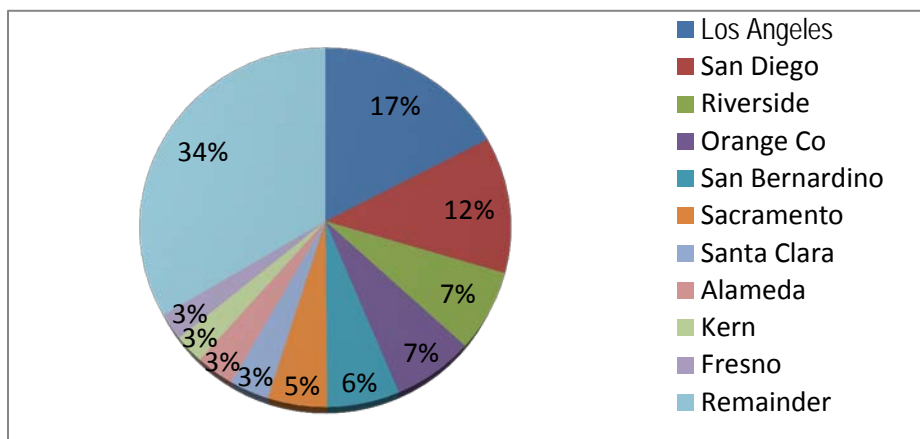
In 2012, California had the largest veteran population in the nation. With approximately 1.86 million veterans, California has nearly nine percent of the nation's veterans. Veterans, however, make up about 6.5 percent of the state's total population, which is a comparatively low percentage when compared to other states (California ranks 48 out of 51 states).¹

According to the March 2013 California Research Bureau report,² a large proportion of California veterans live in Southern California counties, and are heavily clustered in Los Angeles, San Diego, Riverside and Orange Counties. The following charts depict the top geographies in 2011.³

Table A-1: California Veteran Population – Top Geographies

County	Total Veteran Population	% of Veteran Population
1. Los Angeles	319,623	17.3%
2. San Diego	226,852	12.3%
3. Riverside	133,476	7.2%
4. Orange County	127,012	6.9%
5. San Bernardino	112,720	6.1%
6. Sacramento	92,449	5.0%
7. Santa Clara	61,596	3.3%
8. Alameda	60,309	3.3%
9. Contra Costa	55,291	3.0%
10. Kern	47,015	2.5%
11. Fresno	44,206	2.4%

Table A-2: California Veterans - 2011



¹ Unless noted, all data in this section sourced from [American Community Survey](#)

² [Overview of Veterans in California](#), California Research Bureau, March 2013

³ <https://www.calvet.ca.gov/VetServices/Documents/Demographics.pdf>

Additional characteristics of California veterans include:

- Approximately 10 percent of California’s veterans are female.⁴
- Service eras are roughly comparable to the national picture. The largest cohort of California veterans served during the Vietnam era (32.8 percent) followed by those who served during the Gulf Wars to the present (30.1 percent). The largest cohort of male veterans served during Vietnam era, while the largest cohort of female veterans served after September 11, 2001 and during periods of peace.

Table A-3: Veteran Service Eras

	National 2012	California 2012 ⁵	California 2013 ⁶
Gulf Wars (August 1990-present)	24.5%	27.8%	30.1%
Vietnam Era	33.6%	35.1%	32.8%
Korean War (1950-1953)	10.5%	11.9%	9.4%
World War II (1941-1945)	7.3%	8.5%	6.2%
Peacetime only	24.1%	16.7%	24.4%

- Similar to the nation, California’s veterans are older than California’s population as a whole. Over 68 percent, or 1.26 million, are over the age of 55 years.

Table A-4: Age of Veterans

	CA Veteran	CA Population
18 to 34 years	9.5%	32.7%
35 to 54 years	22.0%	36.2%
55 to 64 years	20.8%	15.0%
65 to 74 years	23.2%	8.9%
75 years and older	24.6%	7.2%

- While California has greater ethnic diversity in its veteran population than the nation as a whole, a California veteran is still more likely to be a non-Hispanic White than a California nonveteran.

Table A-5: Veteran Ethnicity

2012	United States Veteran	California Veteran	California Non-Veteran
White, not Hispanic or Latino	79.6%	68.5%	41.4%
Black	11.3%	5.8%	6.0%
American Indian/ Alaskan Native	.8%	1.0%	.7%
Asian	1.3%	5.5%	14.9%
Native Hawaiian/ Other Pacific Islander	.2%	.4%	.4%
Some other race	1.1%	3.4%	12.3%
Two or more races	1.7%	2.9%	3.4%
Hispanic or Latino	5.7%	14.3%	35.3%

⁴ http://www.va.gov/VETDATA/Veteran_Population.asp

⁵ <http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=bkmk>

⁶ http://www.va.gov/VETDATA/Veteran_Population.asp

- As with the nation, California veterans are more likely to complete high school or higher than their nonveteran counterpart (94.5 percent compared to 80.4 percent). College graduation rates are roughly equal (31percent for veterans and 30.9 percent for nonveterans).
- As with the nation, California veterans generally do better than their nonveteran counterparts in several socio-economic indicators.

Table A-6: Socio-Economic Indicators

Indicator	California Veteran	California Non-Veteran
Income*	\$40,514	\$25,344
Male	\$41,056	\$30,649
Female	\$31,146	\$21,478
Unemployment	11.1%	11.2%
Below Poverty in past 12 mos.	7.6%	15.3%

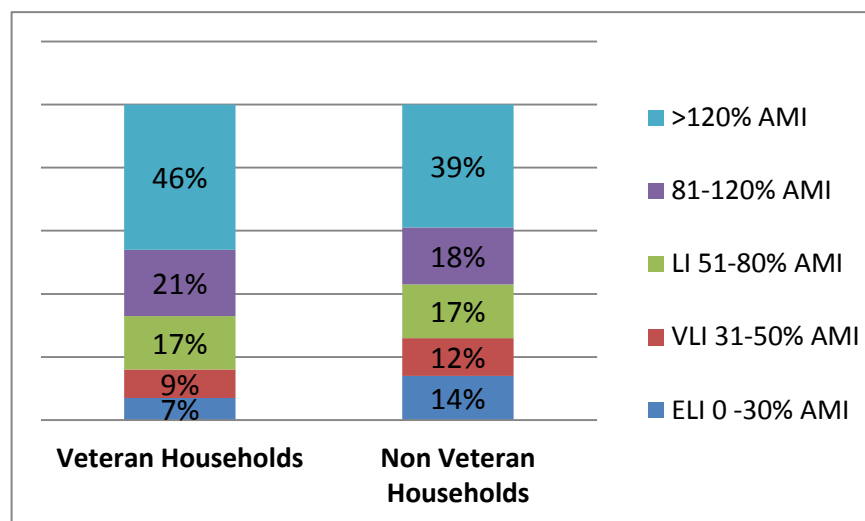
* Civilian income and poverty for 18 years and over

However, as noted in the 2013 California Research Bureau report, there are exceptions within certain age/gender cohorts, including:

- Young male veterans, ages 18-24 have a higher unemployment rate than their civilian counterparts (20.4 percent compared to 16.4 percent in January 2013).
- Young women veterans (34 and under) have higher unemployment than either male veterans or female civilian counterparts.⁷

This chart below from a recent National Low Income Housing Coalition report, “Housing Instability Among Our Nation’s Veterans” compares veteran and nonveteran household income *nationally* in 2011.⁸

Table A-7: Veteran vs. Non-Veteran Income



⁷ [Overview of Veterans in California](#), California Research Bureau, March 2013

⁸ <http://nlihc.org/veterans>

Veteran Homelessness

Data sources to estimate veteran homelessness are not exact, but methodologies have been improving in recent years. Data sources include:

- Annual Homeless Assessment Reports to Congress (AHARS) containing estimates of people experiencing homelessness (the 2011 AHAR contains a separate section on veterans);
- Two veteran-specific AHARs issued by HUD and the VA in 2009 and 2010; and
- Point-in-Time (PIT) counts conducted by local Continuums of Care as a condition of receiving funding from HUD.⁹

Based primarily on the 2012 AHAR and research on risk factors, the 2013 USICH report to Congress on veteran homelessness reported that nationally:

- Veteran homelessness is trending downward, decreasing from 2010 to 2012 by 18 percent;
- More than half of all homeless veterans are in four states, including California;
- Five of the nation's 25 high priority communities are in California
 - Three of these communities in California are trending upward and two had slight declines between 2010 to 2012;
 - Unsheltered veterans are geographically concentrated and remain unchanged in 2012, with 44 percent of unsheltered veterans in California (and over 75 percent of homeless veterans in California unsheltered in 2012).
- Female homeless veterans are increasing, reflecting increased participation of women in the armed forces and there is an increased risk of homelessness among female veterans.
- Veterans born after 1966 have not become homeless at same rate as vets born between 1954 and 1966. Therefore, interventions that successfully move older homeless veterans into housing are key to ending veteran homelessness and reducing healthcare costs.
 - Homelessness in veterans under age 30 increased slightly, from 8.4 percent to 9.1 percent between 2010 and 2011. While less likely to become homeless than veterans from other service eras, Gulf War II veterans are more likely to experience homelessness than other young nonveteran adults and are more likely to be women.
- Veterans are historically at greater risk than other adults in the United States. The reasons are not all related to service, however combat exposure, wartime trauma and PTSD can lead to social isolation and psychiatric hospitalization which are primary risk factors. Criminal justice involvement is also risk factor.
- Vets less likely to be poor, but poor veterans more likely to become homeless than poor nonveterans.¹⁰

⁹ <http://www.hudhdx.info/>

¹⁰ http://usich.gov/resources/uploads/asset_library/USICH_Ending_Homelessness_Among_Veterans_Rpt_February_2013_FINAL.pdf

Highlights of the 2103 report, “Veterans and Homelessness” include:

- Both male and female veterans are overrepresented in the homeless population. According to the 2010 PIT count, veterans represented 16 percent of the adult homeless population, compared to 9.5 percent of the total adult population.
- African American veterans made up 35.5 percent of the homeless veteran population but made up only 11.4 percent of the veteran population 2010. According to VA data, African American veterans represented more than 40 percent of those served in programs for homeless veterans.
- Hispanic veterans were also over represented, comprising 8.5 percent of homeless veterans, compared to 5.3 percent of all veterans.
- As with male veterans, female veterans are more likely to be homeless than women who are not veterans. According to one study, they were between two and four times as likely to be homeless as their nonveteran counterparts. Younger women veterans, especially African American women were more likely to be homeless than older veteran women.
- Research into what veterans face high risk of homelessness is somewhat dated and limited. Some research indicates that military service alone is not associated with higher risk, but may be associated with contributing factors such as war time stress contribution to social isolation. Factors that pre date military service may also play a role.¹¹

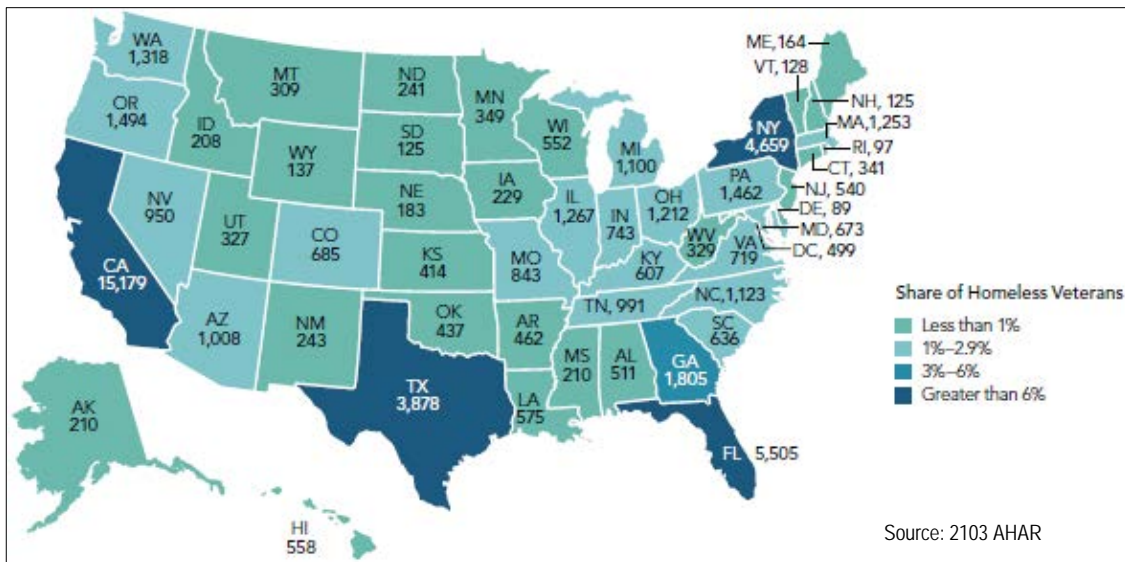
Five prominent risk studies summarized in the report are reflected in the table below.

Table A-8: Homeless Risk Among Veterans

Veteran Group (data year)	Veterans as Percentage of General Population	Veterans as Percentage of Homeless Population	Odds Ratio (Likelihood of Homelessness among Veterans vs. Non)
Men (1986-87)	33.6	41.2	1.38
Men (1996)	28	32.7	1.25
Non-Black Men (2009)	13.6	13.4	1.3
Black Men (2009)	11.8	13.7	1.4
Women (1994-98)	1.3	4.4	3.58
Women (1996)	1.2	3.1	2.71
Non-Black Women (2009)	.09	1.6	2.1
Black Women (2009)	1.1	2.0	1.9

Based on the most recent PIT counts, on a given night in 2013, nearly 15,000 California veterans experienced homelessness, representing nearly 26 percent of the nation’s homeless veterans. In 2013, the City of Los Angeles alone had 10 percent of the nation’s homeless veterans.

¹¹ [“Veterans and Homelessness”](#), Congressional Research Services, Libby Perl, November 29, 2013.

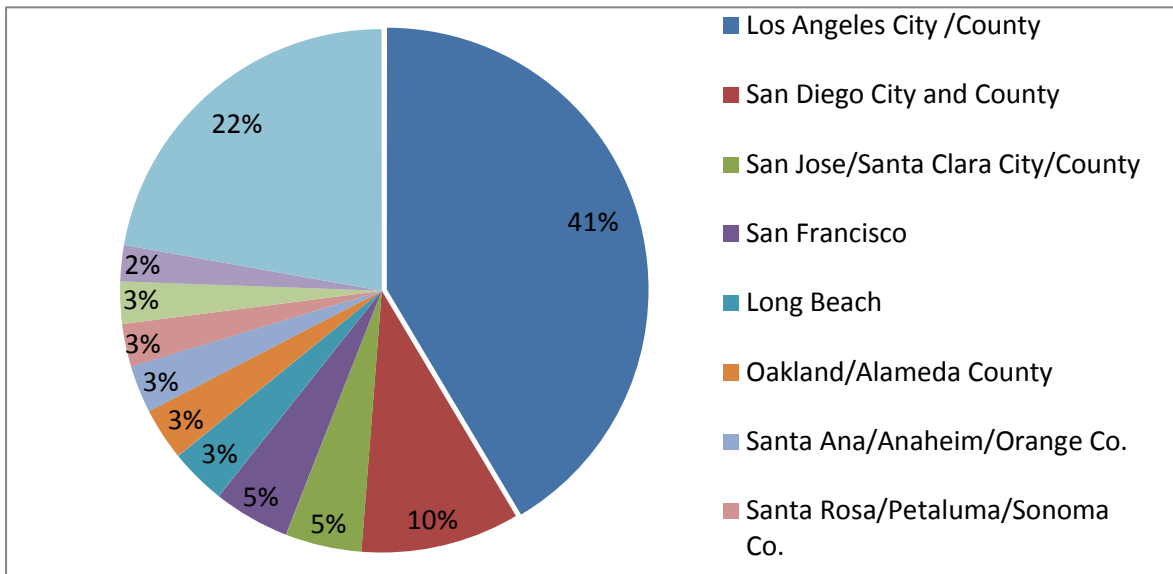


While veterans are five percent of California’s population, they represented 12.63 percent of California’s homeless population in 2012. While this percentage decreased slightly in 2013 to 11 percent of the total homeless population, veterans continue to be overrepresented among the State’s homeless population.

Table A-9: California Veteran Homelessness, 2013 PIT Counts

CoC Name	Total Homeless Veterans	Total Veterans Sheltered	Total Veterans Unsheltered
Los Angeles City /County	6,291	1,450	4,841
San Diego City and County	1,486	798	688
San Jose/Santa Clara City/County	718	139	579
San Francisco	716	294	422
Long Beach	527	363	164
Oakland/Alameda County	492	139	353
Santa Ana/Anaheim/Orange Co.	446	177	269
Santa Rosa/Petaluma/Sonoma Co.	400	57	343
Watsonville/Santa Cruz City & Co.	395	52	343
Fresno/Madera County	338	81	257
Remaining 30 CoCs	3,370	1,116	2,034

Table A-10: California Veteran Homelessness, 2013 PIT Counts



VETERAN HOUSING INSTABILITY

The 2013 “Housing Instability among Our Nation’s Veterans”¹² examines 2011 American Community Survey data to better understand characteristics of the housing needs of veterans as compared to nonveterans. A household has a moderate housing cost burden if it spends more than 30 percent of income on housing costs and utilities and has a severe housing cost burden if it spends more than 50 percent of income on these costs. The data is national data, except where noted.

Overall, veteran households were less likely to be either moderately or severely cost burdened than nonveteran households, faring better on education, median income, health care coverage and poverty rates compared to nonveteran counterparts. For example, seven percent of veteran males (compared to 13 percent of nonveteran) and 10 percent of veteran females (compared to 15 percent of nonveterans) live below the poverty line.

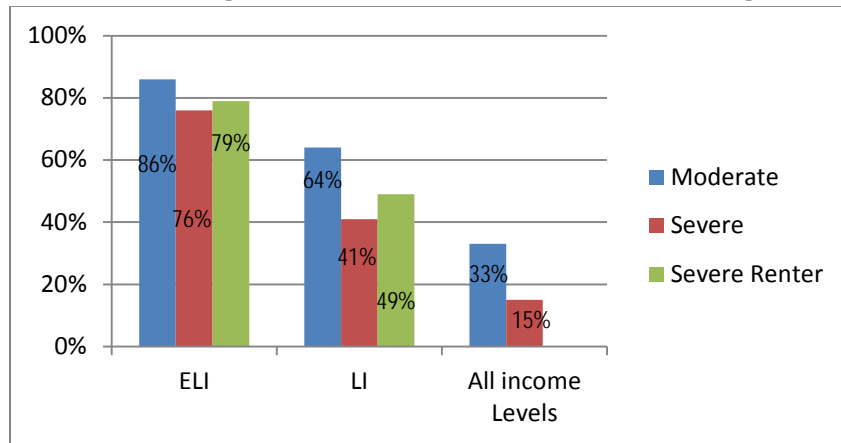
Some veteran groups, however, are more vulnerable to housing instability than others. Veteran households who are low income, racial minorities, female-headed, include a veteran with a disability and include a veteran who served after September 11, 2001 were more likely to be housing cost burdened than other veteran households in 2011.

In California, 33 percent of veteran households (26 percent nationally) were cost burdened. More than half of Black, non-Hispanic Low-Income veteran households were cost burdened compared to 36 percent of White veteran and 48% of Hispanic veteran households in same income category.

¹² <http://nlihc.org/veterans>

Female headed households were more likely to be cost burdened with 82 percent of family households headed by women with extremely low incomes were cost burdened compared to 59 percent of married veteran households.

Table A-11: Percentage of California Veterans with Housing Cost Burden



In California, 15 percent of veteran households (11 percent nationally), or 190,000 households, were severely cost burdened. Of these:

- 76 percent of extremely low-income veteran households in California had a severe cost burden.
- Veterans with service-related disability of 70 percent or higher represent 26 percent of severely cost burdened veteran households
- 87 percent of extremely low-income veteran households serving after September 11, 2001 were extremely cost burdened (compared to 70 percent of veterans in this income category). An even higher percentage, 95 percent, of extremely low income veterans serving in Operation Enduring Freedom/Operation Iraqi Freedom/Operation New Dawn were cost burdened. These veterans are also seeking housing services just months after returning to the US.