



TACOMA HOUSING AUTHORITY

RESOLUTION 2022- 11 - 09 (1)

Date: November 9, 2022
To: THA Board of Commissioners
From: April Black, Executive Director
Re: Sunsetting the College Housing Assistance Program (CHAP)

This resolution would sunset the College Housing Assistance Program (CHAP) through transfer to the Housing Choice Voucher program (HCV) and through program attrition.

Background

The College Housing Assistance Program (CHAP) was developed in 2014 as a partnership between Tacoma Community College (TCC) and Tacoma Housing Authority (THA). In 2019, CHAP expanded to include students at University of Washington, Tacoma (UWT). As of June 2022, CHAP is comprised of 75 tenant-based vouchers and nearly 200 property-based subsidies.

The tables below show the current program requirements:

Tenant Based Vouchers (75)	Property Based Subsidies (197)
<p>Time Limit: Up to 5 years.</p> <p>There is a moratorium on time limits. It is set to expire at the end of 2022.</p>	<p>Time Limit: Varies.</p> <p><i>Highland Flats and Crosspointe:</i> 2 lease renewals (3 years total tenancy)</p> <p><i>Koz Properties:</i> 3 lease renewals (4 years total tenancy)</p> <p><i>As of Oct 2022, THA notified the properties that we will no longer have limits on the number of lease renewals a tenant may have.</i></p>
<p>Non-Housing Related Program Requirements:</p> <p>To maintain eligibility, participants must remain enrolled part-time and making academic progress. Students are permitted one – two quarters off.</p> <p><i>There is a moratorium on non-housing related program requirements. It is set to expire at the end of 2022.</i></p>	<p>Non-Housing Related Program Requirements:</p> <p><i>Highland Flats and Crosspointe:</i> None.</p> <p><i>Koz Properties:</i> To maintain eligibility, participants must remain enrolled part-time and making academic progress. Students are permitted one – two quarters off.</p> <p><i>There is a moratorium on non-housing related program requirements. It is set to expire at the end of 2022.</i></p>

CHAP was designed to “house students who are homeless or at serious risk of homelessness” in hopes that “CHAP will boost student retention and success”. However, recent evaluations and a review of THA administrative data have shown that less than 20% of those housed with a voucher (or 5% of those who are accepted into CHAP) have achieved successful educational outcomes while housed through the program.

Affordable housing would ideally allow them to reduce their non-school workload to give greater attention and time to completing their degree. However, reducing one’s workload and income brings with it an exceptional level of risk. If participants do not remain enrolled and/or making academic progress, they risk losing their rental assistance. These participants are incredibly vulnerable to any negative change in circumstance, and it is unclear just how many participants have entered back into homelessness or disenrolled from college upon being removed from/exiting the program.

Knowing that CHAP is a program intending to serve students whose basic needs are not met (as demonstrated by the housing instability that brought them to the program and quantitative evaluations completed to-date), we have been reflecting on whether post-secondary enrollment requirements and academic-based performance metrics are fair and equitable measures of success. How can CHAP incentivize continued post-secondary enrollment and completion while at the same time not punish participants who struggle to make progress, especially student groups that have historically been marginalized in higher education? When students lose rental assistance for not maintaining eligibility, is the program unintentionally recreating the very problem that it is attempting to solve?

Lastly, external factors such as the global pandemic and an increasingly competitive rental market have introduced unexpected obstacles and disruptions to students’ lives. The challenging rental market and lack of affordable housing has exacerbated Tacoma’s homelessness crisis and made securing housing, even with a subsidy, even more challenging than when the program was originally developed and implemented. The larger community impact from these external forces has also called on THA to examine our role as a housing provider, developer, and landlord. In this context we are faced with challenging questions regarding how we can most effectively leverage our role to help our clients achieve long-term and sustainable success so that once they exit our programs, they are less likely to return to the homelessness system or face severe market rent burdens/housing insecurity.

Though we cannot deny that CHAP has been an incredibly valuable resource for many students and helped hundreds of students secure affordable housing, it is with this larger context in mind that THA’s Policy, Innovation, and Evaluation (PIE) staff have identified the following concerns regarding the continuation of CHAP:

Equity

CHAP is the only program that requires participants take on financial debt or additional financial responsibilities to gain access to our assistance.

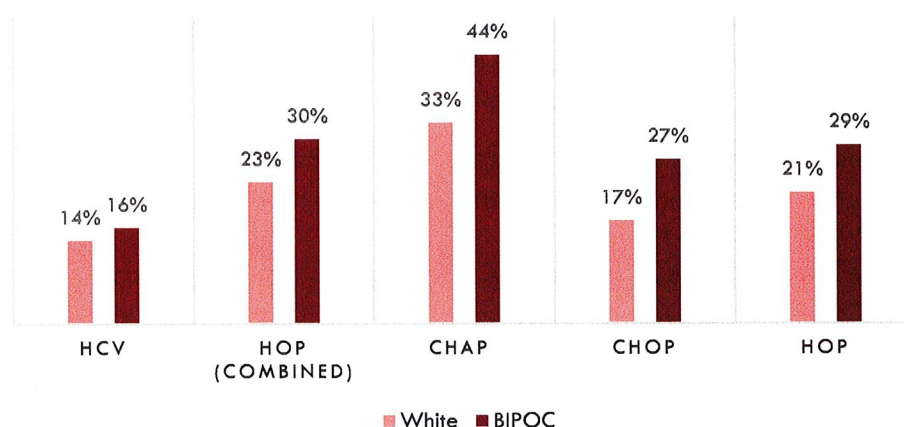
CHAP differs from other programs in that as long as someone is and remains a paying client of our partners, they not only gain access to housing, but they also jump ahead of thousands of other

households in the community who are on our waitlist. This element of the program puts limitations on students' choice should they want to pursue a program at another post-secondary institution.

CHAP has shown inequitable lease-up patterns among the populations served.

Findings from a report from the external research partner, Hope Center¹, have indicated that TCC students with stronger academic profiles were more likely to be successful at securing housing. Males and African American students were less likely to secure housing. When compared to other THA programs, CHAP participants show the highest rate of unsuccessful shoppers and the greatest disparity when disaggregating by race/ethnicity. This reinforces the possibility that CHAP may not necessarily *remove* barriers but is perpetuating inequitable access for students with social capital.

Unsuccessful Shoppers By Program and Race/Ethnicity



CHAP prioritizes students over other community members in equal need of housing.

The last time THA opened its waitlist, we received 12,000 applications. Yet only 1,500 were chosen (by a lottery) to be added to the waitlist. These households often wait 2+ years for housing. If CHAP was shown to improve/accelerate a household's ability to achieve self-sufficiency and economic mobility, the efficacy and impact of the program may justify prioritization of the student population. However, from recent evaluation findings, that does not appear to be the case.

Additionally, we have worked with the state to uncover post-secondary participation rates among THA's residents. Over half of household members aged 18-49 have completed some college but did not earn a credential. The average number of credits completed is 67 – an AA degree requires at least 90 credits. This has motivated THA to explore if and how we can streamline access to post-secondary re-engagement in hopes of supporting these households attain their post-secondary goals.

¹ https://hope.acquiadev.temple.edu/sites/hope/files/media/document/CHAP_FirstLook_Brief-2.pdf

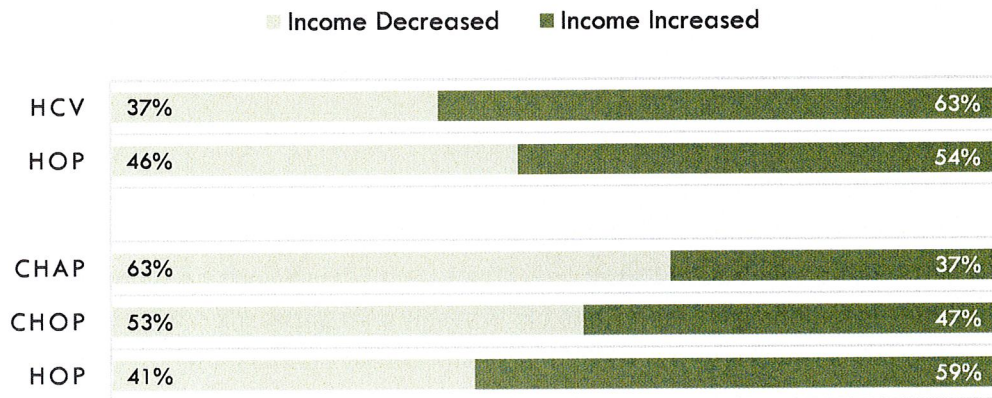
Program Design & Performance

CHAP produces negative externalities related to graduation and completion.

Students have reported taking classes they don't need to maintain their housing. This is especially concerning if it leads to exhausting their financial aid and/or accruing additional student loan debt. Further, given how the rental market has changed in the past few years, we cannot be confident that students can readily afford market rate rents upon graduation.

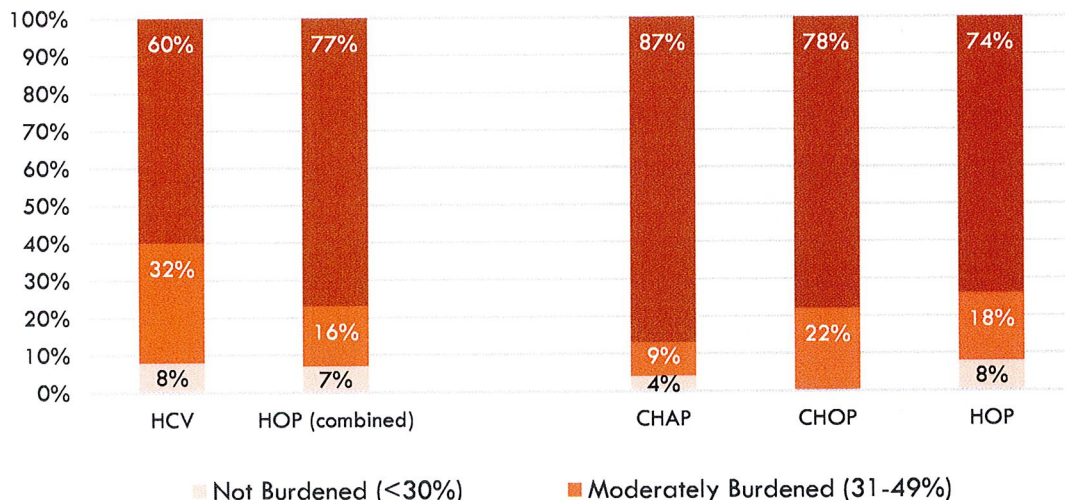
When looking at how CHAP participants compare to participants in other programs, CHAP students were least likely to experience an increase in their income between the time they entered the program and the time they exited the program.

Income Change by Subsidy & Program



Related, when compared to other programs, CHAP showed the highest rate of severe market rent burden upon exit from program.

Severity of Market Rent Burden at Exit by Program



CHAP is not outperforming the existing emergency response system, Coordinated Entry.

A greater proportion of student households were able to secure housing through Coordinated Entry (CE). 86% of the college students served through CE were served through diversion. The diversion pathway is for people who may need minimal case management and/or their housing barrier(s) can be addressed through short-term or one-time assistance (e.g., security deposit assistance, eviction prevention, etc.). Longer term affordable housing subsidies administered by THA may not be the most fitting form of housing assistance for this particular population. *See Appendix A for more information.*

Summary of Public Comment

After internal stakeholder consultation, research, and analysis, THA developed a set of questions to accompany the HOP report and recommendations and posted them for public comment from February 7, 2022 – March 11, 2022.

During public comment we were seeking input on whether CHAP should remain as it is, maintain CHAP as a program for homeless TCC and UW Tacoma students but modify the program to eliminate barriers, or pivot and explore other approaches to support homeless students.

During this comment period, Policy, Innovation, and Evaluation (PIE) engaged with the public in the following ways:

- Posted notice of the public comment period on THA’s website and through multiple postings on THA’s social media accounts.
- Emailed notification to all THA staff.
- Emailed and texted notification of proposed changes to all CHAP households housed with a voucher.
- Fielded a multiple-choice survey for any member of the public to share their preferences.
- Hosted two virtual public forums for members of the community to learn about the proposed changes and ask questions.
- Presented the research and proposed changes to the following stakeholder groups:
 - Northwest Justice Project
 - Tacoma Pierce County Coalition to End Homelessness
 - Continuum of Care Executive Committee
 - Tacoma Urban League
 - THA’s Landlord Advisory Committee
 - DCYF and the Family Recovery Court
 - Tacoma Community College
 - University of Washington, Tacoma
 - The REACH Center
 - Northwest Education Access
 - Clover Park Technical College
 - Pierce College

- Collected general comments and questions via email.

Here is a link to the information we shared during this public comment process:

<https://www.tacomahousing.org/news/notice-of-proposed-changes-to-the-housing-opportunity-program/>

37 comments were submitted to the THA website for public comment.

Which group do you represent?	Count
HOP Participant	24
CHAP or CHOP Participant	5
Other THA Client	1
Representative of a Community Organization/Partner/Non-Profit	2
Tacoma Community Member	3
THA Employee	1
(blank)	1
Total	37

Overall, the written comments we received were split on whether to continue CHAP as a program for TCC and UWT or pivot to find new approaches to serving college students. Approximately 1/3 of respondents did not weigh in on CHAP.

Comments from current CHAP participants were very much in support of maintaining CHAP and leaving it as it is. These comments largely reflected a significant amount of fear on the part of students that any change could result in an end to their rental assistance. Several comments questioned the data presented on CHAP and claimed we cannot have reliable data because as a participant they are still midway through their program. However, the data used to assess CHAP was looking at lease-up rates and comparing households that had exited the program to those on HOP, CHOP, and HCV. (Current participants were not included in exit data. Since the program has been operating for almost 10 years, THA was able to use data from past participants to analyze program exits and impact).

Further conversation with community organizations and other post-secondary institutions highlighted that housing insecurity is not limited to the two schools we currently partner with. Concerns were raised that the program does not address the needs of people wanting to go to school who need to secure housing first. Some community members suggested different types of programs or pathways to support participants taking different educational paths. However, developing more partnerships and additional formulations of the program would significantly increase the administrative burden associated with the program. CHAP is already so complex that many participants are uncertain of what type of assistance they receive and what program requirements they are held to.

For instance, while holding a public forum regarding the changes being proposed for HOP (and CHAP and CHOP), several CHAP participants who use property-based subsidies attended. Many were unaware that CHAP has two different types of subsidies and they wanted to know how the changes would impact their

housing. PBS clients are faced with a 3-4 year time limit which many expressed was not enough to support their long-term educational goals (nationally, the average time to complete a two-year degree is 5.6 years)². To continue to receive assistance they would have to become homeless or near-homeless to re-apply. To further complicate program discussions with participants is the fact that PBS clients are not THA clients. They benefit from THA's subsidy without becoming a THA client. Therefore, when clients contact THA with questions about their situation, we are not always able to assist them, which can cause additional frustration and confusion.

Summary of Feedback from TCC and UWT

For the past two years, THA staff and the Hope Center have consistently shared evaluation feedback with both TCC and UWT. Additionally, THA staff met with both institutions in 2021 to discuss the findings and to capture their concerns and recommendations for the program. This input has been integral in THA's decisions around the HOP subsidy model.

Understandably, TCC and UWT are not supportive of the recommendation to sunset CHAP. CHAP has served as a valuable resource to students enrolled in their programs. Though CHAP has added extra work and administrative challenges for existing college staff, it has largely operated as a program exclusively in service to students enrolled in these two institutions. The nature of the program and partnerships makes it a challenge for THA to develop alternative approaches or proposals that will be met with the same level of support by the institutions. Expanding access to other post-secondary institutions or students more generally will limit the resources for these two schools and adds in an additional layer of administrative complexity. Deepening THA's investment in Coordinated Entry limits our resources to households that are literally homeless and young adults who are at risk of homelessness, thus reducing supports to students who are near-homeless. Shifting focus to re-engaging and streamlining access for existing THA households means asking the colleges to invest time and resources into a population that is not currently enrolled, thus putting a strain on resources and supports available to tuition-paying students.

Additionally, feedback from the institutions included underscoring the impact of a college degree on labor market participation and wage-earning potential. THA staff and leadership do not deny the value of a degree. It is what motivates us to center the needs of our clients and propose avenues in which we could use post-secondary institutions' support in improving college access and completion rates of the recent and future high school graduates as well as the 1,600 household members who, on average, have earned enough credits to be more than halfway through a two-year degree program. Yet, however much we stand by the value of a college

² Source: Doug Shapiro, Afet Dunder, Phoebe Khasiala Wakhungu, Xin Yuan, Angel Nathan, and Youngsik Hwang, Time to Degree: A National View of the Time Enrolled and Elapsed for Associate and Bachelor's Degree Earners (Herndon, VA: National Student Clearinghouse Research Center, 2016).

<https://nscresearchcenter.org/wp-content/uploads/SignatureReport11.pdf>

credential, we cannot in good faith promote housing as a human right while at the same time condition housing supports on post-secondary enrollment and academic progress.

Given THA staff have been unable to develop an alternative model that continues to prioritize TCC and UWT students while addressing the equity concerns cited in this resolution, Dr. Harrell of TCC and Dr. Edwards Lange of UWT have requested that we dissolve the partnership. While it is our hope that collaboration is possible in the future, under the leadership of Foundation for Tacoma Students, THA staff respect this request.

While we are disappointed that we could not find a path forward for our partnership, all data available to THA points to the need to sunset this program, as designed, and focus our resources on providing housing first.

Recommendation

The College Housing Assistance Program has housed hundreds of students since its inception and has been recognized as an innovative approach to addressing housing insecurity amongst students not only locally, but nationally. The recent findings do not undermine that CHAP has had profound impacts on people's lives throughout its many years in operation. And THA must consider the findings and concerns coupled with the changing external environment in determining a path forward for the program. For the reasons presented above, staff recommend sunsetting CHAP.

This recommendation not only takes into consideration larger, systemic forces that challenge the program's ability to produce positive outcomes but also aligns with THA's shift in how we approach our role in the education space. In late 2021, THA signed on to support updated educational goals set by The Foundation for Tacoma Student (FFTS) – a highly qualified backbone organization well equipped to convene various community partners and anchor institutions. The updated goal is to get 70% of Tacoma Public Schools students earning a college degree, technical certificate, or gain a good-earning wage within six years of high school graduation. As the largest landlord in Tacoma, we have a unique role to play when it comes to connecting our households to post-secondary pathways. Additionally, we have 1,600 household members between the ages of 18 and 49 who have completed some college yet never earned a credential. The shift in how we see our role in the education space is one where we are striving to center our existing households and support their efforts to pursue a post-secondary education and/or pathways to build assets and achieve self-sufficiency.

Tenant-Based Vouchers

For the 75 tenant-based vouchers, staff recommend absorbing current clients into the Housing Choice Voucher (HCV) program. This aligns with the recommendations that were approved in April 2022 to convert all fixed subsidy households to an income-based

subsidy. Transitioning CHAP participants to the HCV program would subject them to the same rules as other households on HCV. This means they will not be subject to time-limits nor risk losing their housing because they have graduated, transferred to another school, or are no longer enrolled in school.

Since this transition will result in deeper subsidies and a greater investment on THA's part to ensure participants remain stably housed, these vouchers will not be recycled when participants exit the program.

For new customers seeking assistance, THA will refer TCC to direct students facing homelessness to Coordinated Entry, like we do all other prospective customers. Based on the data provided in Appendix A, we believe this will serve as an effective resource and one that students can access even if they need to disenroll for a time or transfer institutions.

Property Based Subsidies

The property-based subsidy portion of CHAP is governed through THA's contracts with the properties. THA has proposed the following to our property partners:

Effective immediately:

- Remove lease renewal limits at all properties.
- Remove all non-housing related program requirements at properties for which lease renewals are conditioned on enrollment and academic progress.
- Extend the Koz on Market contract, set to expire Jan 1, 2023, an additional year. (This will bring both Koz contracts into alignment. Both Koz contracts would then be set to expire on January 1, 2024.)

By the end of March 2023, inform THA which option the property would like to propose moving forward:

1. Convert the property-based subsidy to a project-based voucher (PBV).
 - a. The transition would happen through attrition.
 - b. PBV tenants would be clients of THA.
 - c. Rent would be based on the tenant's income, calculated by THA, and recertified at regular intervals and/or when the household has a change in income.
 - d. Propose how tenants will be selected. THA proposes two potential options but the owners might have alternatives. THA's options include:

- i. Referrals would come from THA's waitlist and/or Coordinated Entry.
 - ii. Owners will select tenants based on their own marketing plan and refer the future tenants to THA. This marketing plan will be shared with and reviewed by a neutral third party to determine that it is compliant with fair housing law and does not inadvertently discriminate against families with children, the elderly, or result in any other form of disparate impact towards other protected classes.
 - e. No payments will be made on vacant units.
2. Continue with the property-based subsidy model, but open units to all low-income Tacomans.
 3. Continue with the property-based subsidy model and submit an affirmative marketing plan that prioritizes students (or other populations).
 - a. This marketing plan will be shared with and reviewed by a neutral third party to determine that it is compliant with Fair Housing law and does not inadvertently discriminate against families with children, the elderly, or result in any other form of disparate impact towards other protected classes.
 4. Choose not to renew the contract with THA when the contract expires. At that point, all Property Based Subsidy tenants would be eligible for a tenant-based voucher to rent on the private rental market.

We strongly encourage our two property owner partners to talk with the colleges as they consider their options and propose a path forward. The properties will work with THA to determine a feasible transition timeline. THA recognizes that there are still unhoused students on the CHAP waitlist. We ask that the properties coordinate with the colleges to help serve the remaining students on the waitlist during the time leading up to the program modifications.



TACOMA HOUSING AUTHORITY

RESOLUTION 2022-11-09 (1) **(Sunsetting the College Housing Assistance Program)**

A **RESOLUTION** of the Board of Commissioners of the Housing Authority of the City of Tacoma

WHEREAS, the Administrative Plan relates to the administration of the College Housing Assistance Program (CHAP) and is required by HUD; and

WHEREAS, the purpose of the Administrative Plan is to establish policies for carrying out programs in a manner consistent with HUD requirements and local goals and objectives contained in THA's Moving to Work plan; and

WHEREAS, Tacoma Housing Authority is charged with designing, testing, and evaluating innovative approaches to serving additional populations; and

WHEREAS, Tacoma Housing Authority has a responsibility to address when programs are not operating as intended or demonstrate inequitable outcomes; and

WHEREAS, Tacoma Housing Authority seeks to sunset the College Housing Assistance Program (CHAP); and

WHEREAS, Tacoma Housing Authority seeks to ensure current CHAP households are able to remain stably housed and are provided adequate time to achieve self-sufficiency; and

WHEREAS, staff consulted a wide array of program participants, landlords and community members,

WHEREAS, changes to the Administrative Plan must be approved by THA Board of Commissioners; now, therefore, be it

Resolved by the Board of Commissioners of the Housing Authority of the City Of Tacoma, Washington, that:

THA's Executive Director is authorized to revise THA's Administrative Plan Chapters 18 and 19, related to the College Housing Assistance Program in the following ways:

Policy Proposal	Administrative Plan Section Requiring Revision
<p>INTENT TO SUNSET PROGRAM</p> <p>Effective immediately, THA will no longer admit new participants to CHAP. Current CHAP households will no longer be subject to the five-year time limit or non-housing related program requirements.</p> <p>Following the phased implementation plan for converting households with a HOP subsidy to the Housing Choice Voucher program (HCV) (see Chapter 18 PART XXV SUNSETTING THE HOUSING OPPORTUNITY PROGRAM in THA's Administrative Plan), CHAP households who have a HOP subsidy will be transferred to the HCV program when they have a qualifying event that requires THA to end their current HOPP contract (i.e., relocation, move, or port).</p>	<p>Chapter 18 - PART XXV SUNSETTING THE HOUSING OPPORTUNITY PROGRAM (HOP)</p> <p>Chapter 19- COLLEGE HOUSING ASSISTANCE PROGRAM</p>
<p>COLLEGE HOUSING ASSISTANCE PROGRAM REQUIREMENTS</p> <p>Effective immediately, THA will no longer require that participants in the College Housing Assistance Program (CHAP) meet non-housing related requirements for continued eligibility.</p>	<p>Chapter 18 PARTXXIII: FAMILY OBLIGATIONS</p> <p>18-XVI.B. FAILURE TO COMPLY</p>

Approved: November 9, 2022



Shennetta Smith, Chair

Homeless College Students: Comparison of Wait Times and Housing Success

CHAP at TCC

The College Housing Assistance Program (CHAP) is intended to help address student homelessness and housing insecurity. CHAP housing support includes:

- 75 vouchers to rent on the private rental market
- Nearly 200 subsidized apartment units located near the TCC and UWT campuses (0-2bdrm)

294

TCC students applied to CHAP in
2020 – 2021

16%

were housed (n=45)

115

Average days between applying and
move in date

201

Average days between applying and
move in with a voucher

50

Average days between applying and
move into PBS unit

Coordinated Entry

CE is Pierce County's entry point for homeless households to access housing and supportive services. Service providers engage in a creative conversation with the household to assess their needs and best-fit housing support from the options below:

- Diversion
- Rapid rehousing (RRH)
- Permanent supportive housing (PSH)
- THA homeless set-aside units
- Emergency housing vouchers

175

college students entered CE in
2020 – 2021

26%

were housed (n=46)

41

Average days between creative
conversation and diversion move in

191

Average days between
creative conversation and PSH move in

88

Average days between creative
conversation and RRH move in

Top causes of housing insecurity

17%	Family crisis
16%	Domestic violence
15%	Loss of income
13%	Eviction

Resources used by college students in Coordinated Entry

86%	Diversion
13%	RRH
2%	PSH