



**American Planning Association**

*Making Great Communities Happen*

## Policy Guide on Homelessness

Adopted by Chapter Delegate Assembly, March 29, 2003  
Ratified by the Board of Directors, March 30, 2003  
Denver, Colorado

### Introduction

Before 1980, the United States did not experience widespread homelessness. Tonight, approximately 800,000 people will be homeless. This is despite a myriad of programs and organizations designed to address the problem, supported by nearly \$2 billion per year in federal investment. Over the course of a year between 2.3 million and 3.5 million people will experience homelessness.<sup>1</sup>

Several factors have contributed to the rise in homelessness, including escalating housing costs since the 1980s that outstripped personal income growth; accelerated loss of affordable housing stock and declining rental assistance; and decreased affordability and availability of family support services, such as child care. Other social changes including deindustrialization of our central cities, suburbanization, and the resulting concentration of urban poverty, have created unsustainable communities and housing markets. Neighborhood disinvestment has further contributed to the substitution of underground markets, including the trade of illegal drugs, which have undermined families' and individuals' health and well being.<sup>2</sup>

Planners can play a significant role in reducing homelessness by determining local housing needs through their comprehensive plans, removing regulatory and legal barriers to the development of affordable and supportive housing, and fostering community support for permanent housing for the homeless. The lack of affordable housing severely limits a community's ability to end homelessness by limiting its ability to move people from shelters to permanent housing.

A planner's most fundamental responsibility is to improve communities by addressing existing and future needs. Section A-5 of the AICP Code of Ethics (as amended in October 1991) states that a planner "must strive to expand choice and opportunity for all persons, recognizing a special responsibility to plan for the needs of disadvantaged groups ..." The Code of Ethics further states that a planner must "urge the alteration of policies, institutions and decisions which oppose such needs."

This Policy Guide is another in a series of APA policy guides concerning housing related issues and builds on recommended policies APA has adopted in the following guides: Factory Built Housing (2001), Housing (1999), Community Residences (1997), The Supply of Public and Subsidized Housing (1991), and Smart Growth (2002).

### I. Statement of Issues

*What Is Homelessness?* Federal law<sup>3</sup> defines a homeless person as one who "lacks a fixed, regular, and adequate nighttime residence ... and has a primary night residency that is: (a) a supervised publicly or privately operated shelter designed to provide temporary living accommodations... (b) an institution that provides temporary residence for individuals intended to be institutionalized, or (c) a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings." Also included are persons being discharged from institutions that do not have an

identified residence to go to within a week, and persons fleeing domestic violence. The definition excludes those who are in the corrections system or detained pursuant to law. Various federal agencies other than HUD have interpreted the law in light of their specific programs; as reflected in program regulations.

This definition works well in large urban communities, where tens of thousands of persons are literally homeless, on the streets, or in shelters. It has proven problematic in assessing the status of homeless persons in rural areas where there are few shelters. In rural areas, homeless persons are more likely to live with relatives or friends in overcrowded or substandard housing, or in less-than-habitable outbuildings.<sup>4</sup> Frequently these stays are sequential, that is, floating from one home to another until a permanent situation is found, these are the "Hidden Homeless."

It is neither accurate nor appropriate to think about the homeless as a relatively homogeneous group. The Millennial Housing Commission has adopted a general way of categorizing the homeless, based on the research of Randall Kuhn and Dennis Culhane, which provides a framework for considering how best to address and prevent homelessness:<sup>5</sup>

- **Transitionally homeless** persons are those who generally move quickly through the homeless assistance system, once they are able to access it. Their principal need is for housing, plain and simple. Income supports, including employment that pays a living wage is critical to keeping these families housed. The "transitionally homeless" include people that work in entry-level jobs as well as those living on fixed incomes (the elderly, for example, or persons with disabilities that are living on SSI), who earn barely enough to pay for their housing costs and other necessities (such as food, health care, and day care). These individuals and families often live paycheck-to-paycheck or month-to-month, and may be one paycheck away from not making their mortgage or rent payment. Thus, a single short-term emergency, such as an increase in their rent or the loss of a job because of layoff, illness, or injury may result in homelessness.
- **Chronically homeless** persons often experience long-term homelessness, frequently rotating through and among a community's various shelter facilities and the streets. They typically have health or substance abuse problems in addition to extreme poverty. This population is best served by permanent supportive housing, which combines housing with intensive rehabilitation, treatment, and other social services.

*Who Is Homeless?* High housing costs and precarious, low-wage employment leave many American families today only a paycheck, illness, or car breakdown away from homelessness.<sup>6</sup> Families with children are one of the fastest growing segments of the homeless population. A 2000 survey of 25 cities conducted by the U.S. Conference of Mayors found that 36 percent of the homeless population was composed of families with children.<sup>7</sup> This observation is corroborated by other research, which likewise indicates that approximately 34-38 percent of the homeless are families with children.<sup>8</sup> In rural areas, families, single mothers, and children are the largest group of people who are homeless.<sup>9</sup> Homeless children demonstrate serious developmental and learning delays, and are more likely to miss school than children with stable living situations. Poor educational experience can have lifelong impacts.<sup>10</sup>

About two-thirds of the households (50 percent of the people — including children) who experience homelessness over the course of a year are single adults. Most of these people are homeless for a very short time, and leave the homeless assistance system quickly. Others are perpetually homeless, cycling in and out of a variety of shelters, detention facilities, and the health care system.<sup>11</sup>

Single homeless adults are most often men between the ages of 31 and 50.<sup>12</sup> Approximately 20-25 percent of this population experiences serious, ongoing mental illness.<sup>13</sup> Approximately half of the single adult homeless have a past or present substance use disorder.

Runaway and "throwaway" youth are another element of the homeless population, and may include not only youth on the street or in shelters, but also students and children living in doubled-up housing, motels, and substandard housing, or "couch surfing" — the practice of ongoing but temporary stays with unrelated families or friends. This segment has proven difficult to quantify and

is often not included in official counts of homeless people. One study that interviewed homeless youth found that approximately 1.6 million individual youths nationwide were homeless at least one night over the course of a year.<sup>14</sup>

*Why Are People Homeless?* Homelessness results from a complex set of circumstances in which people are forced to choose between food, shelter, and other basic needs, such as medicine and preventive health care.<sup>15</sup> Principal reasons for homelessness include:<sup>16</sup>

- **Poverty:** Eroding work opportunities and declining income for lower-level workers (such as janitors, restaurant workers, retail clerks and stockers, manual laborers), coupled with decreasing welfare benefits and rental assistance funding.
- **Unemployment and Underemployment:** Many people become homeless due to unemployment and underemployment. Even when people are employed, their salaries may not be adequate to afford decent housing or to allow accumulation of savings, living paycheck to paycheck. Many people that seek emergency and transitional housing are employed.
- **Lack of Affordable Housing:** Low-rent units are disappearing from the market — abandoned, demolished, or converted into more expensive housing. Costs of new construction continue to escalate, while deep subsidies that provide direct rental assistance to the poor are declining. Waiting lists for housing assistance average 33 months in the nation's larger cities.<sup>17</sup> Despite recent moves to increase the minimum wage, in no state does a full-time minimum wage job enable most families to pay for a moderately priced two-bedroom apartment.<sup>18</sup>
- **Other Factors:**
  - **Domestic Violence** — Women with no means of support other than their abusive spouses are faced with a Hobson's choice: battering or homelessness. Forty-six percent of the cities surveyed by the U.S. Conference of Mayors reported domestic violence as a primary cause of homelessness.<sup>19</sup>
  - **Lack of Affordable Health Care**— Serious illness or disability can begin a descent into homelessness, beginning with loss of employment income and savings, which lead to eviction.
  - **Mental Illness and Substance Abuse** — Homeless people often face considerable barriers in obtaining treatment due to the lack of adequate resources, including mental health, substance abuse, outreach, and supportive services. Treatment failures occur when homeless people fall out of systems that do not aggressively maintain contact with them or when clients fail to comply with potentially effective medication/treatment regimens. With appropriate treatment and supportive services, the majority of people with mental illness and/or substance abuse issues can succeed in permanent housing. In turn, permanent housing can contribute to improved mental health and abstinence from alcohol or drugs.

*What Is Being Done to Help the Homeless?* The homeless assistance system is principally made up of local public and private nonprofit organizations that deliver a wide range of shelter and supportive services to people who become homeless. These services are generally funded through a patchwork of federal, state, and local public funds, coupled with charitable giving funneled through United Way and faith-based institutions. The aim of the homeless assistance system is to address the immediate needs of the homeless person and get them off the streets and into housing. Once housed, they may or may not receive additional direct services, depending on community resources and individual need.

On the policy front, the federal government is encouraging collaborative planning at all levels. Local service providers must engage in broad-based comprehensive planning for the homeless as a prerequisite for receiving federal homeless funding. The Interagency Council on Homelessness has brought federal agencies together to better coordinate the various programs that offer funding and services for the homeless. Several states have established similar interagency councils.

*What Is the Cost of Homelessness?* Because they have no regular place to stay, homeless persons use a variety of public systems in inefficient and costly ways. This tendency masks the true cost of homelessness by cost shifting to law enforcement, corrections, health care, welfare, education, and other systems. A recent study of nearly 10,000 homeless adults with severe mental illness in New York City found that they used an average of \$40,500 in health, shelter, and correctional services each year. For families, the annual cost of emergency shelter alone can be approximately \$30,000, and in some cities is as high as \$45,000 annually (New York).<sup>20</sup>

## II. Findings

### Planning & Land Use

1. The need for emergency, transitional, and permanent housing for homeless populations is best evaluated with a Comprehensive Plan Housing Element that determines housing needs and priorities and sets forth policies and strategies to meet housing priorities.

2. Local comprehensive plans, in general, should be well integrated with the various plans and strategies that cities must develop in connection with federal housing and homeless funding, such as the Consolidated Housing & Community Development Plan, Continuum of Care for the Homeless, and Public Housing Agency Plan. The result can be ambitious plans that are possible to implement with access to grant funding, that identify appropriate sites and infrastructure for affordable and supportive housing.

3. Contributing to the shortage of affordable and supportive housing is an increasingly inadequate supply of appropriately zoned land (due to large minimum lot sizes for single-family housing and restrictions on siting multifamily or group residential facilities). Low-cost housing development fails to maximize profits for private developers and results in reduced tax revenues to local governments (when compared to more expensive forms of housing). Housing owned by nonprofit organizations may be exempt from local taxation while generating demand for school, infrastructure, and social services.

Supportive housing may be further restricted by covenants and special permitting requirements. Such permitting requirements may restrict the type and frequency of services provided on site, the proximity of the supportive housing to other similar projects, and imposes additional special limitations on density or number of units that exceed those of the zoning district classification.

4. The Continuum of Care planning process mandated by the U.S. Department of Housing & Urban Development as a prerequisite to receipt of funds has helped service providers evaluate community needs, identify gaps and duplication of services, and establish local priorities for use of grant dollars. The Continuum of Care approach, however, remains principally focused on helping communities frame an effective response to homelessness, rather than preventing homelessness in the first place.<sup>21</sup>

5. Planning for both immediate homeless services and prevention of homelessness requires that communities take a comprehensive view of how the social safety net does and does not work for both transitionally and chronically homeless persons. It is not enough to create a homeless assistance system that manages people's experience of homelessness. Communities need to address the root cause of homelessness. Since the homeless assistance system lacks the depth and stability of funding available to more "mainstream" programs and providers, effective planning will need to embrace mainstream programs and providers, such as Temporary Assistance to Needy Families, Community Health Centers, Public Housing Authorities, and Medicaid, to develop prevention strategies.

6. An evaluation of the Continuum of Care planning process mandated by the U.S. Department of Housing & Urban Development as a prerequisite for receiving funding indicates that more people are served and are able to access more and better coordinated programs. Further, a more coordinated approach to provide housing and services for homeless people offers a good framework for increasing communication and information sharing among key stakeholders including mainstream agencies and broadens the base for financial support in the homeless assistance network.

*Note: The seven components, of a full Continuum of Care, are: prevention, outreach and assessment, emergency shelter, transitional housing, permanent supportive housing, permanent affordable housing, and supportive services.*

### **Barriers to Affordable and Supportive Housing**

7. Even when housing providers acquire, improve, or re-use existing housing stock and agree to payment in lieu of taxes to support local infrastructure, they typically encounter intense neighborhood opposition. Opposition to supportive housing in particular tends to be protracted, resulting in increased development costs for projects that already have extremely low margins of economic viability.

8. Spacing requirements for group homes can present barriers to the development of new permanent supportive housing for the homeless.<sup>22</sup>

9. Development regulations, which impose unrealistic parking requirements and unnecessary transportation impact fees, may create financial burdens for developers of supportive housing when they are not reflective of the actual impact of the facility.

10. Despite evidence from numerous studies over the past 20 years, neighborhoods continue to vigorously fight supportive housing arrangements for the homeless on the basis of property values and/or a fear of crime. An Urban Land Institute Report prepared for HUD in 1999 examined the impact of supportive housing on neighborhoods and neighbors in Denver ("The Impact of Supportive Housing on Neighborhoods and Neighbors"). The report showed that supportive housing does not decrease property values nor increase criminal activity.<sup>23</sup>

### **Fair Housing**

11. Many homeless persons, particularly those most in need of permanent supportive housing, experience disabilities. Title II of the Americans with Disabilities Act (ADA)<sup>24</sup> states "no qualified individual with a disability shall, by reason of such disability, be excluded from participation in or be denied the benefits of the services, programs, or activities of a public entity, or be subjected to discrimination by any such entity." The Supreme Court decision in *Olmstead v L.C.*<sup>25</sup> interpreted Title II by requiring public entities to administer services, programs, and activities in "the most integrated setting appropriate to the needs of qualified individuals with disabilities." In essence, *Olmstead* bans the "separate but equal" approach to accommodating the disabled. Although this decision has yet to be applied in a land use context, it certainly raises the issue of whether a community, in restricting zoning or permitting for supportive housing in a manner that limits the supply of such housing, violates the ADA.

12. One consequence of the reasonable accommodations provision of the Fair Housing Act is that local jurisdictions cannot limit the number of homeless persons with disabilities who live in supportive housing, such as group homes. Organizations such as Oxford House have fought and won zoning disputes concerning single-family definitions that limited the number of disabled persons that could live in a group home.

13. Local governments can violate the Fair Housing Act if they stop a group home or deny a reasonable accommodation due to neighbor's fears or prejudices about persons with disabilities.<sup>26</sup>

### **Housing Costs & Supply**

14. Families and individuals at the lowest end of the wage scale have the greatest difficulty in finding and paying for decent housing. These same households are important to community stability and economic growth, as they are typically headed by workers in the service and retail sectors with earnings at or just above minimum wage. Other at-risk households in many communities include entry-level police officers and teachers, as well as low-skilled manufacturing workers.<sup>27</sup>

15. The inventory of affordable housing units keeps shrinking. The absence of a range of viable rental housing options creates a truncated housing continuum. This affordable rental housing crisis

is not new; however, the plight of homeless and poor households has intensified as the gap between minimum wage and the wage a full-time worker must earn an hour to afford adequate housing has increased sharply. The national median housing wage for 2002 was \$14.66 for a two-bedroom apartment or almost three times the Federal minimum wage, which has remained at \$5.15 since 1997. According to the National Low Income Housing Coalition, in no jurisdiction in the United States does a minimum wage job provide enough income for a household to afford the Fair Market Rent for a two-bedroom home.

16. The lack of affordable housing has engendered high rent burdens. Housing assistance is at a premium. People are placed on long waiting lists. The average time on the waiting list for Section 8 rental assistance is approximately 33 months. These exceedingly long waiting lists mean that people must remain in shelters longer. The loss of single room occupancy housing has also contributed to the growth of homelessness. According to the 2000 "Survey on Hunger and Homeless in America," a report of the U.S. Conference of Mayors, single men compose 44 percent of the homeless, and single women make up 13 percent.

### **Fiscal Impacts of Homelessness**

17. Homeless persons are more likely to use the most expensive health care interventions, such as emergency rooms. Homeless people spend on average four more days per hospital visit than comparable non-homeless people, at a cost of approximately \$2,414 per hospitalization.

18. Homelessness frequently results from and aggravates serious health care problems, including addiction. Attempts to treat people who do not have stable housing are ineffective and costly.

19. Homeless persons spend much time in jail or prison, often for petty crimes. It is not unusual for homeless people to continue to commit minor offenses so that they can return to the relative safety and warmth of a jail cell. The typical cost of a prison bed in a state or federal facility is \$20,000 per year, compared to a typical annual rent subsidy of about \$4,500-\$6,000. Compromised health and time in jail limit homeless people's employability, and create long-term reliance on welfare systems.

20. Emergency shelter is the most immediate and basic response to homelessness. However, emergency shelter is the least cost-effective approach to solving the need for long-term housing. With an average annual cost of \$15,000 for singles and \$25,000-\$30,000 for families, emergency housing is far more expensive and less effective than the typical annual rent subsidy of \$4,500-\$6,000 per unit.<sup>28</sup>

## **III. Specific Policy Positions**

**1. Planners should work to ensure that local comprehensive plans include housing elements that provide for a diverse choice of housing opportunities, in all price ranges, distributed throughout the community and for inclusion of appropriate types of supportive housing in amounts consistent with demonstrated need. Local Planners should encourage the specific subject of homelessness in local comprehensive plans. This can be done as part of the housing element and can be tied to affordable and attainable housing as goals and recommend the homeless be considered as part of any "special needs" audience that may be identified in a local plan.**

### *Reason to support:*

Planners can reduce homelessness by using the Housing Element of the Comprehensive Plan to determine housing needs and to develop effective strategies to address identified housing issues, including homelessness.

**2. Local Planners should encourage coordination between the general planning/land use departments with community development and/or human service funding agencies and nonprofits.**

**Specifically, planners should identify and cross reference common goals or related objectives in local land use plans with federally mandated housing and community development plans and strategies (i.e.: HUD Consolidated Plans, Neighborhood Revitalization Strategies, and Continuum of Care Strategies.)**

*Reason to support:*

Coordination promotes the efficient use of public funds. The coordination of planning efforts provides a platform for addressing housing needs strategically, with an integrated vision that guides, connects, and communicates a more comprehensive effort. This effort may promote equity by offering a continuum of supportive housing options.

**3. Planners should ensure that local comprehensive plans address the need for a wide array of emergency, transitional, and permanent housing to serve the homeless, including rental units for households with incomes below 30 percent of area median income (See APA Policy Guide on Housing, 1999).**

*Reason to support:*

Unless there is an adequate supply of housing to meet the needs of very low-income households, including those with disabilities, communities will not be able to effectively address homelessness.

**4. Planners should work to ensure that every community has reasonable facilities to accommodate the needs of the homeless on a short-term or emergency basis.**

*Reason to support:*

Emergency shelter should be considered a basic community service. In the wealthiest nation on earth, there is no excuse for people to perish from exposure, but it happens across the nation every day. Short-term shelters get people off the streets and offer the opportunity to access supportive services that can help them to overcome the circumstances and barriers in their lives that prevent them from securing and maintaining permanent housing situations. A shelter is not intended to become, nor should it be a long-term solution to homelessness, but a humanitarian measure that in the interest of public health offers basic protection from harm.

**5. The American Planning Association and its Chapters should take a leadership role in educating planners and local government officials about the fair housing implications of local land use regulation.**

*Reason to support:*

Zoning and subdivision regulations may contain measures that conflict with federal protections under the Fair Housing Act. Among the most common problems are ordinances restricting the number of unrelated individuals who may occupy a residence, standards for development that unduly restrict access by protected classes, and restrictions on supportive services provided within a residential unit. Planners and local governments must become more knowledgeable about the Fair Housing Act and its connection with land use to ensure that all citizens have equal access to appropriate, affordable housing.

**6. The American Planning Association, its Chapters, and its Divisions (especially the Planning and Law Division and the Housing and Community Development Division) should collaborate to produce materials and promote activities to identify and remove barriers to affordable housing.**

*Reason to support:*

Homeless individuals and families need affordable and supportive housing. Local planners and planning commissioners need more training about affordable housing, supportive housing, and fair housing laws to create better planning decisions at the local level. They must be given the tools to appropriately evaluate proposals, starting with a review of zoning and subdivision regulations that may present barriers to affordable housing. An understanding of fair housing law can assist local planners in making proper decisions.

**7. The American Planning Association, its Chapters, and its members should partner in educating planning commissioners and elected officials concerning the need for diverse housing types to serve the homeless and non-homeless special needs populations and provide tools to better evaluate housing proposals.**

*Reason to support:*

APA should oppose neighborhood efforts to thwart housing for the homeless and non-homeless special needs populations on the basis of prejudices and fears concerning property values. APA should assist Planning Commissioners and elected officials with tools to objectively evaluate affordable housing and supportive housing proposals (e.g., Building Better Communities Network resources).

**8. The American Planning Association and its Chapters support Federal, State, and local efforts to streamline existing programs and lower barriers to producing and preserving affordable housing and support efforts that provide incentives to increase the supply of affordable rental housing.**

*Reason to support:*

As noted in the Millennial Housing Commission Report, in 1999 one in four households — an estimated 28 million — spent more than 30 percent of their income on housing, and one in eight low-income working families earning the equivalent of a full-time, minimum wage reported spending more than one-half of their income on housing. It is estimated that 1.7 million poor households live in substandard housing. Government at all levels should use the tools at their disposal to promote infill incentives, property tax abatement, density allowances, land assembly, and fast track permitting.

**9. The American Planning Association and its Chapters should promote federal leadership in ending homelessness including increased and direct aid to states cities and localities, including coordination of federal efforts through the Interagency Council on Homelessness, funding for supportive services, and increased commitment to affordable, permanent housing.**

*Reason to support:*

Federal support for homeless programs continues to be vital. Increased interagency coordination has resulted in better, more streamlined approaches to funding for homeless services and permanent housing, while emphasizing local determination in how programs are designed and delivered. Federal resources will continue to be critical in meeting the demand for the permanent housing that is needed by special needs populations, but cannot be built entirely without some sort of federal subsidy.

**10. The American Planning Association and its Chapters support the establishment of a National Housing Trust Fund to serve as a source of revenue for the increasing the affordable rental-housing inventory (See APA Policy Guide on Housing, 1999).**

*Reason to support:*

Federal support for the housing sector has been uneven, especially, in addressing the affordability challenge confronting many lower-income households. The affordable housing crisis severely affects extremely low-income families earning at or below 30 per cent of area median income. The proposed National Affordable Housing Trust Fund focuses specifically on targeting these low-income households. The Trust Fund should be used primarily for the production of new housing, preservation of existing federally assisted housing, and rehabilitation of existing private market affordable housing. Trust Fund dollars can be used to ensure economic integration, such as the production of new, mixed income housing. Legislation has a real goal of 1,500,000 housing units by 2010.

**11. The American Planning Association and its Chapters support the establishment of State, Regional, and/or local housing trust funds with a permanently dedicated source of public revenue to support the production and preservation of affordable housing.**

*Reason to support:*

There are over 150 housing trust funds in the United States. Recent statistics indicate that more than \$500 million has been invested in affordable housing via these trust funds every year. These funds support a variety of housing activities that target homeless, low, and very low income households including new construction, preservation of existing housing, homeless shelters, housing-related services, and capacity-building for nonprofit housing organizations. These housing trust funds successfully demonstrate government's commitment to finding a solution to the nation's critical housing needs. Documented economic benefits of Housing Trust Funds include more employment opportunities, higher property tax revenues, and increased sales taxes.

**12. The American Planning Association should join with the U.S. Conference of Mayors, the National Alliance to End Homelessness, the Corporation for Supportive Housing, the National Coalition for the Homeless, and the National Law Center on Homelessness and Poverty to encourage federal, state, and local interagency collaboration to end homelessness.**

*Reason to support:*

Good planning requires close cooperation of all levels of government. APA's voice alone is not sufficient to carry this message; partnership with other organizations will allow the planning agenda to demonstrate a broad base of support.

**13. To implement the foregoing policies the American Planning Association and its Chapters recognize that some small fully developed communities may need intergovernmental agreements with adjacent or larger communities in meeting these needs.**

## Notes

1. Millennial Housing Commission. *Meeting Our Nation's Housing Challenges*. Washington, D.C.: U.S. Government Printing Office, 2002.
2. National Alliance to End Homelessness. *A Plan: Not a Dream. How to End Homelessness in Ten Years*. Washington, D.C.: NAEH. 2001.
3. *Stewart B. McKinney Homeless Assistance Act*, 42 USC § 11301 et seq. (1994).
4. U.S. Department of Agriculture. *Rural Homelessness: Focusing on the Needs of the Rural Homeless*. 1996.
5. Millennial Housing Commission, 2002.
6. National Coalition for the Homeless. *Fact Sheet #1: Why are People Homeless?* Washington, D.C.: National Coalition for the Homeless, 1999.
7. U.S. Conference of Mayors. *Status Report on Hunger and Homelessness*. Washington, D.C.: U.S. Conference of Mayors, 2001.
8. Burt, Martha. *America's Homeless II: Populations and Services*. Washington, D.C.: Urban Institute, 2000.
9. Vissing, Yvonne. *Out of Sight, Out of Mind: Homeless Children and Families in Small Town America*. Lexington, Ky.: University of Kentucky Press, 1996.
10. National Alliance to End Homelessness, 2001 (all of the examples cited appear in this NAEH policy document).

11. National Alliance to End Homelessness, 2001.
12. Burt, Martha, and Barbara Cohen. *America's Homeless: Numbers, Characteristics, and the Programs that Serve Them*. Washington, D.C.: Urban Institute, 1989.
13. Koegel, Paul, et al. "The Causes of Homelessness," in *Homelessness in America*. Oryx Press, 1996.
14. Ringwalt, C.L., J.M. Green, M. Robertson, and M. McPheeters. "The Prevalence of Homeless Among Adolescents in the United States." *American Journal of Public Health*, 1998.
15. National Coalition for the Homeless. *Fact Sheet #1: Why are People Homeless?* Washington, D.C.: National Coalition for the Homeless, 1999.
16. National Alliance to End Homelessness, 2001.
17. U.S. Department of Housing & Urban Development. *Waiting in Vain: An Update on America's Housing Crisis*. Rockville, Md.: HUD User, 1999.
18. Menino, Thomas M. Editorial, *Los Angeles Times*, July 31, 2002. (Menino is the mayor of Boston, Massachusetts, and president of the U.S. Conference of Mayors.)
19. U.S. Conference of Mayors, 1998.
20. Culhane, Dennis P., Stephen M. Metraux, and Trevor R. Hadley. 2002. "Public Service Reductions Associated With Placement of Homeless Persons With Severe Mental Illness in Supportive Housing." *Housing Policy Debate* 13(1):107-63.
21. U.S. Department of Housing & Urban Development. *Evaluation of Continuums of Care for Homeless People*. Washington, D.C.: HUD User, 2002.
22. The Department of Justice and HUD have taken a position that separation requirements which have the effect of "foreclosing group homes from locating in entire neighborhoods" are not consistent with the Fair Housing Act. (Statement of the Department of Justice and the Department of Housing and Urban Development, "Group Homes, Local Land Use, and The Fair Housing Act," August 18, 1999) See [www.usdoj.gov/crt/housing/final8\\_1.htm](http://www.usdoj.gov/crt/housing/final8_1.htm)
23. See also "Why Affordable Housing Does Not Lower Property Values" from HomeBase, [www.habitat.org/how/propertyvalues.html](http://www.habitat.org/how/propertyvalues.html).
24. 42 U.S.C. §§ 12131-34.
25. *Olmstead v. L.C.* (98-536) 138 F.3d 893.
26. Statement of the Department of Justice and the Department of Housing and Urban Development, "Group Homes, Local Land Use, and The Fair Housing Act," August 18, 1999). See [www.usdoj.gov/crt/housing/final8\\_1.htm](http://www.usdoj.gov/crt/housing/final8_1.htm).
27. U.S. Conference of Mayors, 2001.
28. Culhane, Dennis P., Stephen M. Metraux, and Trevor R. Hadley. 2002. "Public Service Reductions Associated With Placement of Homeless Persons With Severe Mental Illness in Supportive Housing." *Housing Policy Debate* 13(1):107-63.