

PIERCE COUNTY HUMAN SERVICES  
COMPREHENSIVE PLAN TO END HOMELESSNESS IMPLEMENTATION  
ADVISORY BOARD

**Summary Notes of Board’s Discussion on Options  
to Create the Proposed Unified Regional Office on Homelessness,  
and the Board’s Recommended Option**

December 23, 2022  
[Compiled by Michael Mirra]

**SOME BACKGROUND AND ADVISORY BOARD’S RECOMMENDED OPTION**

The Pierce County Council appointed the Advisory Board initially to draft the Comprehensive Plan to End Homelessness. The Board did that. The Council approved the plan in March 2022. The County Council then continued the ‘s work with the newly assigned role of monitoring and advising the County about the Plan’s implementation.

The Plan’s first recommended goal is that the County establish a “Tacoma-Pierce County Unified Regional Office of Homelessness.” *See* Plan at page 15. The Plan reported that such an office is a feature of effective efforts in other jurisdictions to address homelessness. *See* Plan at page 11. The Plan stated that such an office would serve four purposes:

- Shared Vision, Accountability, and Transparency
- Cost Effective Performance and Accountability
- Coordination Among Plan Elements and Partners
- Coordination of the Collection and Analysis of Data -

*See* Plan at page 11.

Part of the Plan’s recommendation for a Unified Regional Office calls upon the County to “[i]nitiate a consultant-led process to design the Unified Regional Office organizational leadership structure to prevent and end homelessness, including leading community engagement and communication efforts.” The County engaged Social Change Partners. These consultants canvassed an array of community voices in Pierce County about such a unified office. The consultants also considered models of such an office in other places.

On December 2, 2022, the consultant presented their preliminary report to the Advisory Board. Its final report goes to the County Council in January. At the December 2<sup>nd</sup> meeting, the Board members offered various views about the consultant’s preliminary report. This memo summarizes the part of the discussion that focused on how to create a Unified Regional Office. This memo also summarizes subsequent discussions within the Board and among other community members. This summary does not recount the content of the consultant’s report.

The table below lists options for how the County may create a Unified Regional Office, showing the advantages and disadvantages of each. These options are numbered.

**THE ADVISORY BOARD RECOMMENDS THAT THE COUNTY COUNCIL CHOOSE OPTION \_\_\_\_.**

**ADVANTAGES**

**DISAVANTAGES**

**OPTIONS TO CREATE A UNIFIED REGIONAL OFFICE ON HOMELESSNESS, WITH SOME PROS AND CONS OF EACH**

**OPTION 1. CREATE A NEW ENTITY**

The county can create a new organization for the purpose. A precedent would be the action by the County and 14 local cities that created the SOUTH SOUND HOUSING AFFORDABILITY PARTNERS (SSHA3P).

- A new organization would have the advantage of being new. The current organizations and structures have not been as effective as the emergency requires. Settling for the status quo may be the easier path but it has not worked so far.
- A new organization focused on addressing homelessness would offer the advantage of that focus. The mission would not be diffused inside a large organization with many other jobs.
- A new organization can be designed for the purpose unburdened by a structure, or a mission, designed for other purposes.
- A new organization staffed by people dedicated to the mission will reduce the confusion and lost learning that result when people move around inside or leave larger organizations with many different missions.
- The work it would take to create a new organization will indeed be hard and time consuming; but it is worth the effort. That effort merely reflects its importance. The work will require the participating jurisdictions to face and determine their measure of seriousness in ending homelessness. That will be a reflective moment for the community, which may be a good thing.

- SSHA3P is not an encouraging example for creating a new entity. It took a lot of work and more than 2 years to create SSHA3P. It is still not clear what will come of the effort. SSHA3P is still focused on creating its own administrative structure and processes. It is not clear the region has the appetite or the stamina to do this again, and for such a closely related purpose.
- The widespread homelessness in Pierce County is an emergency. In the face of this emergency, even if we had the energy and stamina to create another organization, we do not have the time. The need for action is too plain and dire.
- Creating yet another entity dedicated to ending homelessness will be confusing alongside other entities that share that mission or a related mission, *i.e.*,
  - Pierce County Department of Human Services;
  - Tacoma/Lake-wood/Pierce County Continuum of Care Oversight Committee;
  - Pierce County Comprehensive Plan to End Homelessness Advisory Board;
  - Tacoma-Pierce County Coalition to End Homelessness;
  - SSHA3P.
- Creating a new organization will add yet another “silo” to further fragment the effort.
- SSHA3P has a very limited budget and a staff of 1.5 FTE. A new organization will not likely be much better resourced.

	ADVANTAGES	DISAVANTAGES
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<b>OPTIONS 2: FORMALIZE COOPERATION AMONG EXISTING JURISDICTIONS</b>
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A Unified Regional Office can form from a collaboration of Pierce County and the county's cities and towns.

This collaboration can have various levels of formality.

<p><b>OPTION 2.1</b> <i>Interlocal Cooperation Agreement, Chap. 39.34 RCW</i></p> <p><i>An Interlocal Cooperation Agreement would be a formal type of collaboration.</i></p>	<ul style="list-style-type: none"> <li>● The Interlocal Cooperation Act, Chap. 39.34 RCW, allows public jurisdictions to memorialize their collaboration, to delegate authority among the signatories, and to ease procurement, data sharing, and other functions.</li> <li>● An Interlocal Cooperation Agreement, because of its status under state law, would confer an enhanced stature and authority on the collaboration beyond what a Memorandum of Understanding would offer.</li> <li>● Negotiating the terms of an Interlocal Cooperation Agreement will take a lot of work. That effort merely reflects its importance. The work is worth it. In particular, memorializing the various commitments and delegated authorities of the signatory jurisdictions will be require them to face and determine their measure of seriousness in ending homelessness. That will be a reflective moment for the community that may be a good thing.</li> </ul>	<ul style="list-style-type: none"> <li>● The Interlocal Cooperation Act will need extensive detail describing, among other elements, the commitments of the signatory jurisdictions, their delegations of authority, commitment of funding to the effort, and an assignment of operational and management responsibility. Negotiating these details may take as much work as it took to create and launch SSHA3P. That may not be an encouraging prospect.</li> <li>● The resulting collaboration will still need a separate staffing and budget that is not likely to be significant.</li> </ul>
<p><b>OPTION 2.2</b> <i>Memorandum of Understandings</i></p>	<p>A Memorandum of Understanding (MOU) among Pierce County and the county's cities and town offer the same advantages and disadvantages as an Interlocal Cooperation Agreement (see above.) A MOU is less formal than an Interlocal Cooperation Agreement. This lesser formality may be an advantage to the extent that it may make the MOU easier to negotiate. This informality may also be a disadvantage if it means that the commitments are less meaningful.</p>	

**OPTIONS 3. USE OR REPURPOSE EXISTING ORGANIZATION**

Pierce County already has several organizations that include in their mission the ending of homelessness: *E.g.*:

- Pierce County, probably inside the Department of Human Services;
- Tacoma/Lake-wood/Pierce County Continuum of Care Oversight Committee (CoC)

One of these existing organizations can serve as the Unified Regional Office.

**OPTION 3.1**

*Expand the subject matter scope of SSHA3P to include ending homelessness in Pierce County.*

- As presently designed, SSHA3P is charged with meeting the area’s need for affordable housing. It does not extend to eliminating homelessness. Yet ending homelessness is necessarily related to the creation of more affordable housing. The Comprehensive Plan to End Homelessness states this directly: “

“The causes of homelessness are complex and require a systematic response that accounts for that complexity. Yet, the complexity should not conceal a basic cause: Pierce County does not have enough housing for its residents, and much of its housing is not affordable, especially for households earning less than 50% of Area Median Income. . . . While increasing the supply of housing available to people experiencing homelessness is ultimately the most important factor affecting the success of ending homelessness, that effort cannot be addressed through this plan alone. The homeless crisis response system needs to coordinate with private and public housing developers, the South Sound Housing Affordability Partners (SSHA3P), and various municipal affordable housing action strategies. . . . *Ultimately, without access to permanent affordable housing that low-income households can sustain, the homeless crisis response system cannot successfully exit households from homelessness.*” Plan at page 7 (*emphasis added*).

- After two years of work by the participating jurisdictions, SSHA3P now offers the advantage of already being created. An agreement by those jurisdictions to expand SSHA3P’s scope can save the work of creating yet another entity.

- While SSHA3P does exist, it appears that its founders and staff do not favor expanding its scope of work. SSHA3P is preoccupied with its present mission.

- Expanding SSHA3P’s mission to include ending homelessness may upset the measure of consensus among 15 jurisdictions that managed to create it.

- SSHA3P’s mission to create affordable housing in each participating jurisdiction is sufficiently different from the mission to end homelessness, which is a regional challenge requiring regional coordination. The two missions cannot easily share the same organization without distracting from both missions.

	ADVANTAGES	DISADVANTAGES
<p><b>OPTION 3.2</b> <i>Tacoma/Lakewood/Pierce County Continuum of Care Oversight Committee (CoC) as the Unified Regional Authority</i></p>	<ul style="list-style-type: none"> <li>● Federal law requires local jurisdictions, as a condition of receiving federal funds to address homelessness, to form a CoC. This confers on the CoC this measure of authority and stature.</li> <li>● The CoC, as federal law contemplates it, should already have a cross section of diverse stakeholders whose support and help will be necessary to the effort.</li> <li>● Strengthening the CoC by empowering it as a “Unified Regional Office” will make Pierce County more competitive for federal grants that favor communities with strong CoCs.</li> </ul>	<ul style="list-style-type: none"> <li>● The Tacoma/Lakewood/Pierce County CoC lacks a track record of administrative or organizational capacity or developing the administrative structures capable of program design, procurement, project management, financial accountability, and implementation. It would need a full rebuild with adequate funding and staffing for the purpose. Much of these functions would duplicate what the county already has.</li> <li>● The CoC, being outside the formal structure of local government, will lack an easy access to decision makers controlling funding, permitting, and zoning or an easy use of their influence and confidence with members of the public.</li> </ul>
<p><b>OPTION 3.3</b> <i>Pierce County would serve as the Unified Regional Office. A likely spot inside the county government for this function would be either Department of Human Services or the creation of a “Homelessness Tsar” position with its own operational and budgeting authority and staffing, and with a direct access not only to the County Executive but also the County Council.</i></p>	<ul style="list-style-type: none"> <li>● Addressing the emergency of widespread homelessness can be thought of as a “war”. To fight a war you need leadership and an organization capable of making decisions and implementing them. Pierce County provides that structure.</li> <li>● Pierce County has the authority and expertise over zoning, permitting, and other necessary functions.</li> <li>● It has relationships with local jurisdictions.</li> <li>● The County has the administrative processes: procurement; finance; HR; employment benefits.</li> <li>● The County already has the capacity to collect, assess, and present homelessness data.</li> <li>● Most of the federal, state, and local funding for homelessness comes through Pierce County anyway.</li> </ul>	<ul style="list-style-type: none"> <li>● Pierce County, by itself, does not have the community contacts or diverse support the effort will require. Instead, it is necessarily, and by definition, more beholden to its elected Councilmembers and the Executive.</li> <li>● Pierce County government has so many mandates and priorities other than ending homelessness. This will make it harder to retain the focus that ending homelessness will require.</li> <li>● Pierce County’s focus on ending homelessness and its effectiveness will oscillate with the interests and commitment of succeeding elected officials.</li> </ul>

	ADVANTAGES	DISAVANTAGES
	<ul style="list-style-type: none"> <li>• The advantage of County leadership shows in the effort to create the Community Village. The progress to date would not have occurred in an organization directly answerable to 15 separate jurisdictions.</li> <li>• The county’s foundation in electoral authority make it more likely than any other organization to elicit the public support and confidence necessary to end homelessness.</li> </ul>	
<p><b>OPTION 3.4</b>  <i>A middle ground option would combine options 3.3 and 3.2. It would place the Unified Regional Office inside Pierce County. It would establish the CoC to provide an advisory function.</i></p> <p><i>This would also allow the Council to disband the Comprehensive Plan to End Homelessness Advisory Board.</i></p>	<p>This combination option would offer the respective advantages listed above of establishing the Unified Regional Office inside Pierce County and having the CoC provide an advisory oversight function.</p> <p>This would also allow the County to discontinue the Advisory Board and in that way reduce the number and confusion of entities focused on ending homelessness.</p>	<p>To the extent that the work would be divided between Pierce County and the CoC, it is not a “unified” office. To avoid confusion, the division of responsibility would have to be clear.</p> <p>This combination option would still require the County to invest in strengthening the CoC’s administrative and representative capacity so that it has the confidence of the community.</p>