

Shelter Licensing Comments on Draft 1

Document Location	Comment	Commenter	Committee Response to Comment
Page 1	Concerned about the people experiencing homelessness in shelter vs. unsheltered people	Provider/Coalition	
General	Will this require a new department?	Provider/Coalition	
General	Would the assembly just consider focusing on the good neighbor plan?	Provider/Coalition	
Page 2	Why was the approach taken to spend Muni money on new expertise to assess whether there should be a license instead of relying on accreditation vs. new services?	Provider/Coalition	
Page 2	AWAIC doesn't match any of these definitions. Both emergency shelter and transitional shelter on same property. Current limit in the draft is 8 or less people.	Provider/Coalition	
Page 2	Transitional living can sometimes be simply housing that expects residency from 6 months to 2 years. It might be problematic to include that in this effort.	Provider/Coalition	
Page 2	Emergency cold weather shelter – excluded. What's the reasoning for the exclusion?	Provider/Coalition	
Page 2	What if a shelter is called a Temporary shelter that has have mostly domestic violence guests....where does it fall in this?	Provider/Coalition	
Page 2	Current model for BFS is 24-hour shelter – would it require two licenses – day and night?	Provider/Coalition	
Page 2	What happens if the night shelter has one operator, and the resource hub has another operator; both on the same campus? The draft says “one license”.	Provider/Coalition	
Page 3	The definition of low barrier is not correct.	Provider/Coalition	
Page 3	What appeal will be provided to recipient if not allowed to be admitted?	ANC Library	

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Page 3	Low barrier usually means that alcohol is not a barrier to entry. What is "screening" meant in the low barrier definition?	Provider/Coalition	
Page 3	I would just encourage us all to think about barrier shelter as a continuum rather than binary. Why make the distinction in licensing? Are there different requirements depending on the classification?	Provider/Coalition	
Page 4	Age limit? Is this to be different than the State	Provider/Coalition	
Page 4	Runaway, is that standard term?	Provider/Coalition	
Page 4	We would prefer a different term than runaway.. youth (age range) experiencing homelessness would be preferred	Provider/Coalition	
	Good neighbor policies I have seen in this town put all the onus on individuals experiencing homelessness and providers and not on the police the muni etc. I have sent an example of a community wide policy to the Mayor and others for months. I strongly believe this is a better approach.	Provider/Coalition	
Page 4	What if one organization provides night shelter and another organization provides day shelter on the same campus? How will that campus be licensed?	Provider/Coalition	
Page 4	I'd like to see how transitional housing licensing in this lens may impact Assisted Living Home's with transitional services.	ANC Library	
Page 4	Comment on day shelter: with the current definition this may unintentionally include home and community-based services, community centers and behavioral health day services.	Mental Health Trust Authority	

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Page 4	Who is the Director?	Provider/Coalition	
Page 4	Hire lots of former felons – huge positive impact – 50% of staff have felonies, they know the streets and find this very difficult	Provider/Coalition	
Page 4	I'm interested how the barrier crime language will impact the upcoming Peer Support certifications in our community.	ANC Library	
Page 4	The paragraph about the required license for day shelter is very brief and doesn't describe the necessary components. I recommend limiting this to a good neighbor policy, trash responsibility around the shelter, and background checks for the leaders.	Provider/Coalition	
Page 6	Number 15 – copy of the rules of conduct and including a proposed maximum stay	Provider/Coalition	
Page 6	as a part of accreditation background checks and processes are covered. I still cannot find the section about accreditation if you could please point me to that.	Provider/Coalition	
Page 6	Staffing ratio – only mentioned here but not identified	Provider/Coalition	
Page 6	#15- All services offered are listed, unclear if this is for all services at the location or services related to shelter	Provider/Coalition	
Page 7	Is there a process for land use and shelter licensing to be concurrent or sequential?	AHD	
Page 7	Accreditation meets all of the above criteria, but may not be included in the good neighbor policy. CSS receives accreditation Council On Accreditation (COA)	Provider/Coalition	
Page 7	Request: Can shelters that receive accreditations send that process/timeline/requirements to the assembly to compare and minimize duplication	Assembly	
Page 8	Regarding section D, is there a grandfathered in process for shelters already in operation? Or are they subject to both the new applicant and renewal process?	Provider/Coalition	

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Page 8	Regarding notice of cease in operations, how does this look in child care licensing? Is it the same timeframe?	Provider/Coalition	
Page 9	CSS has a barrier matrix they use and can share that with the Assembly. Wondering about the liability around background checks and how much falls on the Muni.	Provider/Coalition	
Page 9	There are multiple references to background checks. This requirement should be limited so as not to preclude the use of people with lived experience serving as volunteers or as paid staff; as deemed appropriate by the operator. Maybe the operator should be required upon application for renewal to report if there have been any problems in this area? Only then decide if more individuals need to have background checks?	Provider/Coalition	
Page 10	What is the implementation cost of shelter licensing and creating expertise in AHD?	Provider/Coalition	
Page 11	Regarding B- Assembly will define "Access"	Assembly	
Page 11	Will be submitting further comment on low barrier, high barrier, etc.	Provider/Coalition	
Page 11	The Sullivan appears to have 2.5 feet between top and bottom bunks, is that in practice or is the requirement for bunks 3.5 feet?	Provider/Coalition	
Page 11	From the meeting chat- ESG Standards shared (b) Minimum standards for emergency shelters. Any building for which Emergency Solutions Grant (ESG) funds are used for conversion, major rehabilitation, or other renovation, must meet state or local government safety and sanitation standards, as applicable, and the following minimum safety, sanitation, and privacy standards. Any emergency shelter that receives assistance for shelter operations must also meet the following minimum safety, sanitation, and privacy standards. The recipient may also establish standards that exceed or add to these minimum standards. (1) Structure and materials. The shelter building must be structurally sound to protect residents from the elements and not pose any threat to health and safety of the residents. Any renovation (including major rehabilitation and	AHD	

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	conversion) carried out with ESG assistance must use Energy Star and Water Sense products and appliances. (2) Access. The shelter must be accessible in accordance with Section 504 of the Rehabilitation Act (29 U.S.C. 79(2) Access. The shelter must be accessible in accordance with Section 504 of the Rehabilitation Act (29 U.S.C. 794) and implementing regulations at 24 CFR part 8; the Fair Housing Act (42 U.S.C. 3601 et seq.) and implementing regulations at 24 CFR part 100; and Title II of the Americans with Disabilities Act (42 U.S.C. 12131 et seq.) and 28 CFR part 35; where applicable.		
Page 11	Can you elaborate on the “sleeping area” and the requirement for 50 gross square feet when common areas are not included? Is that a person has a sleeping area and then adjacent to the sleeping area a client has a personal space of 50 feet?	Provider/Coalition	
Page 11	Goal is to provide space for clients and avoid a sardine shelter system and work with providers to create.	Assembly	
Page 12	Why is Emergency Cold Weather Shelter not included in this standard? Would like to see it included in these requirements as ECWS is often a contributor to over population	Provider	
Page 12	Originally looked at limiting to year round providers to avoid requirements on churches, temp shelters, etc. But those could be included in phase 2 of licensing	Assembly	
Page 12	We should see what we need to bring over to emergency cold weather shelter. And whether there should be any substantive standards in Code. Or if the application for that shelter covers.	Assembly	
Page 12	One of the purposes listed for the shelter licensing is data collection, are you planning to support or require HMIS usage for non-HUD funded shelters?	Provider/Coalition	
Page 12	CSS would prefer a community wide Good Neighbor Policy- this would allow for broad community buy-in from police, fire, people	Provider/Coalition	

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	experiencing homelessness, and community members. A community wide policy would		
Page 12	Should the Assembly draft the Good Neighbor Policy or should it be facilitated by ACEH?	Assembly	
Page 12	A community wide policy is good, but doesn't allow for neighborhood engagement with the non-profit/provider. Providers and neighborhoods can work very well together if they develop the plan together. Problems arise when communities and providers don't work together.	Assembly	
Page 12	In current form, the Good Neighbor Policy draft, lists required elements for strong good neighbor policy including grievance process, advisory council, etc.	AHD	
Page 12	What does B.1. "no tolerance for unlawful loitering" etc. look like? How will that be enforced and how will the Muni. be accountable to this commitment? Would love to see measurable requirements around municipal outreach, keeping sidewalks cleared, etc.	Provider/Coalition	
Page 12	In relation to 3 rd avenue, the Municipality would fund an outreach team similar to Anchorage Downtown Partnership- Safety Ambassadors to support public safety and you'll have the Mental Health Crisis Response Team	Assembly	
Page 12	How could the roll out of P&R Healthy Spaces program to support some of the clean up efforts	AHD	
Page 14	Chat: there is a specific reference to children in 16.125.100- B.2. Not sure if that is intentional or not	Provider/Coalition	
Page 14	Is this the same process that child care licensing follows and if it isn't, why not?	Provider/Coalition	
Page 14	MOA commitment - some suggestions, like licenses and training for shelters to use HMIS, maximum timeframes for application review or application denial appeal (is there an appeal option?), operations training	Provider/Coalition	

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<p>General</p>	<p>Regarding “enable and maintain data collection and monitoring of the homeless population” (one of the purposes of licensing according to the draft). It does not seem that as written licensing draft actually addresses data collection, but it could do so by coordinating with the Anchorage Coalition to End Homelessness (ACEH) Homeless Management Information System (HMIS). HUD charges each Continuum of Care (CoC) with selecting an HMIS software solution that complies with HUD's data collection, management, and reporting standards. In Anchorage the CoC is ACEH. HUD does not require non-HUD-funded entities to participate in HMIS (HUD has no authority to do that – although HUD does award competitive points in some cases for communities that have better coverage), but it looks like this licensing process could. Once document that might be helpful:</p> <p>https://files.hudexchange.info/resources/documents/SNAPS-Data-TA-Strategy-to-Improve-Data-and-Performance-Overview.pdf</p>		
<p>General</p>	<p>Strategy Two on this document has a vision for “improved systems to collect accurate, comprehensive and timely data” for this purpose (to better understand and address people who experience homelessness), particularly around bed coverage and accuracy of data. Licensing could provide a vehicle to move the community forward in data collection by requiring participation in such a system, and possibly training and supports (cover HMIS licensing fees and training costs for example) for doing so. It should be noted that HUD provides ACEH with a certain amount of funds to facilitate this process with HUD-funded housing, but not non-HUD funded housing or shelter. So, to effectively support this effort on a community-wide, funding has to be incorporated from other sources as well. Also note</p>	<p>Provider/Coalition</p>	

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	that HUD also recognizes that DV shelters must participate in a parallel but separate system under the Violence against Women Act and to protect people feeling domestic violence.		
General	HUD provides ACEH with a certain amount of funds to facilitate HMIS with CoC-funded housing, but not non-HUD/CoC funded housing or shelter. So, to effectively support this effort on a community-wide, funding has to be incorporated from other sources as well. Could the city licensing fee cover the HMIS licensing fees? HMIS training costs? Custom report options? Additional reporting the Muni wants to see?	Provider/Coalition	
General	If the Muni is expecting standards for operations, it might also consider an annual training for shelters, in conjunction with the CoC (and HUD), to focus on certain topics important to licensing (good neighbor policy, for example).	Provider/Coalition	
Timing of Renewal/Application for License	Timing of review/application – there is a lot in the draft currently that describe when an application must be submitted. There is not much in there that refers to how long the director has to make a decision/do the review, or how an applicant might appeal a negative decision. When questions get political, or even when not, it could be possible a review is delayed for a variety of reasons, what happens then? A renewal could lapse with no decision. For my area at HUD, we are required to take no longer than 45 days to review an Action Plan submitted by the city, or the plan is automatically approved. It is a good incentive to provide a timely response on a plan. Another option is to allow for the review to pause with a request for additional information, and give the applicant a certain period of time to provide the addition.	Provider/Coalition	

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General	Accreditation or certification by national bodies should be encouraged and should allow waiver of duplicated standards by the MOA; consider only requiring a good neighbor policy if a shelter is accredited or certified	Provider/Coalition	
General	Consider inclusion of a review of this ordinance at one year for the purpose of evaluation whether the costs of implementation are worthwhile.	Provider/Coalition	