HOMELESSNESS: A CASE STUDY IN PROGRAM EFFECTIVENESS VS. KNOWLEDGE / UNDERSTANDING OF THE MCKINNEY-VENTO HOMELESS ASSISTANCE ACT

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ABSTRACT

This evaluative case study, which utilizes both quantitative and qualitative data, creates a new body of knowledge expressly related to the effectiveness of nonprofit programs for the homeless. The study investigates the use of funding based upon McKinney-Vento Homeless Assistance Act (MVHAA) criteria and program directors' understanding / knowledge of that criteria. Quantitatively, the constructs in the research were assessed for any possible associations, based on the following theories: (a) lack of MVHAA knowledge by NP program directors results in ineffective programs that do not offer services that comply with the purposes, goals and key performance indicators of the MVHAA; and (b) lack of MVHAA knowledge by NP program directors results in the misuse of federal funds. Qualitatively, factors related to noncompliance from the perspectives of NP program directors were explored and remedies for the cause(s) of such non-compliance are offered. Ultimately, the findings can be used to promote public and organizational awareness of the MVHAA's objectives and goals, and may assist in overcoming the barriers to eradicating homelessness.

Key words: Annual Homeless Assessment Report, homelessness, HUD, MVHAA, non-profit organizations, program directors

RESUMEN ABSTRACTO

Este estudio de caso evaluativo, el cual usa datos cuantitativos tanto como cualitativos, crea una nueva gama de conocimiento exclusivamente relacionado a la efectividad de los programas sin fines de lucro (NP) para personas sin hogar. El estudio investiga los criterios para el uso de los fondos basados en el Acta de Asistencia para Personas sin Hogar McKinney-Vento (MVHAA) y el entendimiento del director del programa y su conocimiento de ese criterio. Cuantitativamente, los constructos en esta investigación fueron avalados para cualquier posible asociación, basados en las siguientes teorías: (a) falta de conocimiento del MVHAA por los directores del programa NP en programas inefectivos que no ofrecen servicios que cumplan los propósitos, metas e indicadores de desempeños clave de los MVHAA; y (2) falta de conocimiento por parte de los directores del programa NP resultando en el mal uso de fondos federales. Cualitativamente, se exploraron los factores relacionados al no cumplimiento desde la perspectiva de los directores del programa NP y los remedios para la(s) causa(s) de dicho no cumplimiento. En fin, los hallazgos pueden ser usados para motivar una alerta pública y a la

organización de las metas y objetivos del MVHAA, y puedan ayudar a sobreponerse a barreras y así erradicar el problema de la falta de hogar.

Palabras clave: Informe Anual de Avalúo de los Desposeídos, sin hogar, HUD, MVHAA, organizaciones sin fines de lucro, directores de programa

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Introduction

There are an estimated 6,000 homeless persons in San Juan, Puerto Rico (SJ PR), and more than 50% of these are chronically homeless (Ortúzar, 2006; Rodríguez-Burns, 2006; Tendeciaspr, 2006). In 2007, Puerto Rico received \$21 million dollars in federal funding under the provisions of the McKinney-Vento Homeless Assistance Act (MVHAA), also referred to herein as the *Act*, the majority of those funds being allocated to nonprofit (NP) programs in the greater San Juan metropolitan area. In spite of this large investment, homelessness continues (Lopez-Caban, 2007; Parés, 2006). According to the U.S. Department of Housing and Urban Development (HUD), there is a need for evaluation of homeless programs at both the national and local levels based upon the knowledge / understanding of MVHAA criteria (2007).

Statement of the Problem and Purpose

Homelessness in SJ PR is a major social, economic, and geopolitical problem. Each year, the federal government provides over \$6 million to NP organizations in the San Juan metropolitan area under the provisions of MVHAA (LexJuris Puerto Rico, 2004), the principal funding authority. The Act has as its ultimate purpose the elimination of homelessness. Funds are made available to NP organizations to foment housing, income, and self-sufficiency for the homeless (HUD, 2007). In many instances, these funds are recurrent (HUD, 2007). Nevertheless, over half of the homeless served are chronic, i.e., they have experienced recurrent episodes of homelessness and their most recent episode has lasted more than 2 years (United States Department of Housing and Urban Development, 2006; Ortúzar, 2006; Rodríguez-Burns, 2006; Tendeciaspr, 2006). The surge and chronicity of homelessness put into question the effectiveness of the programs and the appropriate use of funding allocated under the provisions of the Act. There is no question as to whether NPs are providing much needed social welfare and other services to the homeless, but there is a question as to whether these services are directed to the achievement of the established goals of the principal funding authority, (i.e., the MVHAA).

The purpose of this evaluative case study was to create a new body of knowledge expressly related to the effectiveness of NP organizations and the use of funding based upon MVHAA criteria and program directors' knowledge / understanding of these criteria. It was hypothesized that part of the problem is related to NP directors' limited working knowledge of the Act and / or its purposes. Consequently, using a mixed methodology, service outcomes and uses of funding by NP programs in SJ PR were examined, and the possible associations among NP program directors' levels of knowledge of the MVHAA and NP program effectiveness and use of funding were explored.

The study assisted in identifying possible factors related to noncompliance by NP programs with MVHAA goals and objectives, and offers remedies for the causes of such noncompliance. In order to accomplish this purpose, a custom survey instrument was designed and used to collect data from 38 out of the 45 NP program directors in SJ PR. Service outcomes and funding levels reported in the survey were verified with NP Annual Progress Reports (APRs)

submitted to HUD and evaluated and analyzed in conjunction with MVHAA key performance measures.

The findings of this research can be yet another tool for determining and improving the effectiveness of NP programs. The results of the research can be used to promote awareness of the Act, thereby improving overall compliance. Public and organizational awareness of the provisions of MVHAA and increasing emphasis on outcomes may also assist in overcoming the identified barriers to successfully achieving the Act's principal goals of the eradication of homelessness, the advancement of societal development and progress, and the transformation of lives.

Background and Significance

Currently, there is no effective governmental mechanism to monitor program outcomes. Instead, control mechanisms have been set in place to monitor the use of governmental funds in terms of services, whose outcomes may, or may not, comply with the overall goals and purposes of the Act. The purpose of this evaluative case study, which utilizes both quantitative and qualitative data, was to create a new body of knowledge expressly related to the projected and desired outcomes of MVHAA. In order to achieve this goal, research questions and objectives, developed specifically for this research, were addressed. Quantitatively, the constructs in this research were assessed for any possible associations, based on the following theories adapted from Yin's (2003) framework for assessing program effectiveness.

1. Lack of MVHAA knowledge by NP program directors results in ineffective programs that do not offer services that comply with the purposes, goals and key performance indicators of the Act,

2. Lack of MVHAA knowledge by NP program directors results in the misuse of federal funds.

Research Questions

A custom survey instrument was designed to collect both the qualitative and quantitative data. In order achieve the objectives of this case study, the following research questions were addressed. The first four questions are quantitative and the last is qualitative.

1. What service outcomes, do homeless programs in SJ PR achieve?

2. How, and for what purpose, do homeless programs use MVHAA government funding?

3. How do program directors' levels of MVHAA knowledge influence program effectiveness?

4. How do program directors' levels of MVHAA knowledge influence the use of funding?

5. What are the possible factors that influence NP services and service outcomes that are not in compliance with MVHAA goals and objectives?

Brief Review of Related Literature

In order to achieve a greater understanding of the problem, a thorough review of the existing literature was conducted. The MVHAA, as the principal funding source, provides the criteria for evaluating NP homeless programs. However, understanding of the complexity of homelessness, as referenced in the MVHAA, and the factors that may influence NP program effectiveness and use of funding are also important in effectively confronting this significant social problem. The literature review was used to offer contextual and background information regarding (a) the evaluation of NP programs under MVHAA, Title IV (Subtitle C); (b) the nature

and extent of the complexity of homelessness at the national level; (c) background information on homelessness in Puerto Rico; (d) the history and development of the MVHAA; (e) a review of the goals, objectives, and provisions of the MVHAA; (f) factors that influence homeless program effectiveness; and (g) a conclusion, summarizing the importance of this research.

There is a great deal of literature and information on homelessness in the U.S. For example, Barak (1992) provided comprehensive exploratory research on the nature of homelessness by examining the possible causes and consequences of homelessness, as well as possible remedies. Barak utilized various surveys and interviews aimed at the homeless and also used a large reference base, which was used in this research as a bridge to other studies and survey analyses. The information was expanded upon to develop an understanding and analysis of the homeless condition, which is ultimately related to detachment from the affiliating bonds that connect individuals to societal networks and structures.

Burt (2003), specializing in the area of homelessness for the Urban Institute, presented several studies related to the homeless and public policy. In a recent study on chronic homelessness, the author emphasized the fact that "the most chronic, disabled, street-dwelling homeless people will accept and remain in housing, given the right configuration and the right supportive services" (Burt, 2003, p. 1267). Research indicates that there is a relationship between recurring homelessness and program effectiveness. Burt also considered certain types of individuals who are particularly vulnerable to chronic homelessness and discussed factors that may influence the non-effectiveness of programs targeting the problems of the homeless, such as drug or alcohol abuse, mental illness, or disabilities. Burt based her research on information gathered from the Urban Institute's research instrument, the "National Survey of Homeless Assistance Providers and Clients," (Aron, Burt, Douglas, Iwen, Lee, & Valente, 1999, p. xvii)

which also provided an excellent point of reference for this study. The Urban Institute's instrument was used to provide insight into the following: (a) definitions of homelessness, service centers, and programs; (b) sampling; (c) data collection approaches such as mail, telephone, in-person; (d) content of survey design; and (e) analysis and research techniques in this area (Aron et al., 1999).

Valuable information for the present case study was also obtained from several studies on homelessness and public policy on the website of the Urban Institute, which provides insight into the social problems related to homelessness. There is a great deal of literature on homelessness that assists in the understanding and analysis of the problem of homelessness in the U.S., but there is only a limited amount of reliable information on the problem of homelessness and programs for the homeless in SJ PR. Nevertheless, existing studies (Colón-Soto, 2005; Puerto Rico Homeless Management Information System, 2007) provide insight into the characteristics of the homeless population in SJ PR.

Colón-Soto (2005) studied homelessness, housing programs, and NP organizations in Puerto Rico. This study included a psychometric response scale, i.e., a Likert-type scale, in its questionnaire as the primary research tool. The Likert scale's response categories represented an ordinal level of measurement and responses; they indicate the relative position of items, but not the magnitude of difference, and can be analyzed using non-parametric tests. In spite of the inherent weaknesses of the Likert scale, which may include distortion from central tendency bias, acquiescence response bias, and / or social desirability bias, the study is a valuable resource as it provides insight into survey design and content.

Additionally, Colón-Soto (2005) provided qualitative insight from key personnel in NP organizations and government agencies that are related to programs for the homeless. For

example, she included statements by Dr. Edna Rodríguez Valentín of the Department of Housing in Mayaguez on issues related to homelessness and society. The purpose of Colón-Soto's exploratory research survey was to provide a wider understanding of the nature of the homeless problem in Puerto Rico. Colón-Soto's study is useful in that it provides insight into (a) homelessness in SJ PR, (b) inter-governmental relationships, and (c) NP organizations. However, the information gathered via the questionnaire must be scrutinized for repeated overt political bias and / or personal agenda.

Because only limited research on the evaluation of programs established under the auspices of the MVHAA is available, it was important to access those existing studies to gain insight into the relevant components of program evaluation. The MVHAA, itself a government source, can be used to detail the purpose, programs, and strategies of the Act that address homelessness in America and sets forth the principal criteria for program evaluation used in this research. The definitions on which this study is based (e.g., a *homeless person*) can be found in the Act (McKinney-Vento Homeless Assistance Act, 1987).

In order to achieve criterion validity, it was of utmost importance that other studies related to the area of program evaluations be reviewed and the key principles applied. According to Senate Report No. 410 (2000), the Committee on Appropriations recommended that there is a need to evaluate the administration of MVHAA programs by U.S. Department of Housing and Urban Development (HUD) at the local, state, and federal levels. The Committee expressed concern regarding the way in which funding is structured and distributed. The literature review details the Committee's recommendations to improve the effectiveness of MVHAA programs.

After reviewing the existing related literature and research, it was noted that few studies have a direct relation to MVHAA-funded programs in Puerto Rico and that most existing studies

have used exploratory research designs. According to Glisson, Thyer, and Fischer (2001), studies in this area are overwhelmingly descriptive, and there is a need for research in this area to be taken to the next level, i.e., research is needed regarding the possible associations between variables and / or research in relation to outcome evaluation. Evaluation of NP programs under MVHAA, Title IV (Subtitle C) is particularly overdue.

Definition of Terms

In order to avoid confusion and ensure clarity, the following definitions have been included. These definitions provide a framework for the present research and are in full accordance with the terminology employed by the MVHAA. Additionally, the definitions were verified with the NP Annual Progress Report (APR) format required by HUD.

Homeless person. A homeless person is "an individual who lacks a fixed, regular, and adequate nighttime residence" (McKinney-Vento Homeless Assistance Act, 1987, para. 1).

MVHAA knowledge. MVHAA knowledge refers to the degree of knowledge that the person-in-charge of a program has about the MVHAA.

Program. In this investigation, *program* refers to a NP program with supportive services for the homeless in SJ PR (United States Department of Housing and Urban Development, 2008c).

Program effectiveness. A program is deemed effective when the program outcomes assist participants in (a) obtaining and maintaining permanent housing, (b) increasing skills and income, and (c) achieving self-sufficiency and independence (United States Department of Housing and Urban Development, 2008c).

Program participant. A program participant is a homeless person who lives at a transitional housing program facility and / or receives supportive services.

Provisions of McKinney-Vento Homeless Assistance Act (MVHAA). The provisions of the MVHAA refers to Title IV (Subtitle C) of the Act, which is related to the promotion of rehabilitation for homeless persons with a view to foster self-sufficiency and independence (United States Department of Housing and Urban Development, 2008c).

San Juan, Puerto Rico. In this research, San Juan, Puerto Rico refers to the Greater San Juan metropolitan area, which includes San Juan, Bayamon, Carolina, Guaynabo, Trujillo Alto, etc.

Use of funding. In this research, *use of funding* refers to the allocation and use of financial and human resources allowed under the provisions of the Act to a particular program.

Highlights and Limitations of Methodology

An evaluative case study, which utilizes both quantitative and qualitative methods, was considered as an appropriate design for this research. Yin (2008) confirms that both types of data, i.e., quantitative and qualitative, may be used to evidence case studies. According to both Yin (2008) and U.S. General Accounting Office (1990), the case study method is particularly useful in program evaluation. Moreover, case study research is especially appropriate for understanding how or why something occurs, as in this research. Yin proffers that the case study is "an all-encompassing method" (p. 14), including design, data collection, and data analysis techniques. He makes a clear distinction between the case study and qualitative research methods, and proposes that case studies are both qualitative and quantitative, and need not include "direct, detailed observations as a source of evidence" (p. 15).

Consequently, a custom survey instrument was used to collect the following information from NP programs funded under the MVHAA in SJ PR (a) service outcomes based upon the NP's Annual Progress Report (APR) submitted to HUD, (b) use of funding also based upon the NP's APR, (c) program directors' levels of MVHAA knowledge based upon survey responses, (d) program effectiveness based upon MVHAA goals and key performance indicators, and (e) possible factors for non-compliance based upon survey responses. According to Yin (2008), a survey may be used as part of the design for a case study for the purpose of program evaluation. Care was taken in developing the survey instrument to avoid causing program directors to skip questions that could reflect adversely upon their performance. Question content and wording were addressed by structuring each question in a clear and understandable manner to reflect the terms and phrases used in the APR. To ensure the reliability of data provided by the program directors, all program figures in relation to the APR and funding were verified with HUD.

The purpose of the qualitative component was to identify the possible factors related to noncompliance by NP programs with MVHAA goals and objectives, and to offer remedies for the cause or causes of such noncompliance. The qualitative component consisted of two openended questions. Each question was reviewed and evaluated by categorizing responses into factor groupings based on key-word identifiers. This design was used to gain insight from the perspective of the program directors into the identified problem.

Summary

An evaluative case study utilizing both quantitative and qualitative data was used in this research. The literature review includes an overview of the related studies and contextual and background information regarding (a) the evaluation of NP programs under MVHAA, Title IV (Subtitle C); (b) the nature and extent of the complexity of homelessness at the national level; (c) background information on homelessness in Puerto Rico; (d) the history and development of the MVHAA; (e) a review of the goals, objectives, and provisions of the MVHAA; and (f) a

conclusion, summarizing the importance of this research. The investigation was guided by the research questions:

1. What service outcomes do programs in SJ PR achieve?

2. How, and for what, do programs use MVHAA government funding?

3. How do program directors' levels of MVHAA knowledge influence program effectiveness?

4. How do program directors' levels of MVHAA knowledge influence the use of funding?

5. What are the possible factors that influence NP services and service outcomes that are not in compliance with MVHAA goals and objectives?

In this section, each research question is presented and the findings summarized. The implications of the findings are then discussed.

Research question 1: What service outcomes do programs in SJ PR achieve? MVHAA literature provides a benchmark for services, and this allowed for the use of goal-based evaluation. According to MVHAA, grant recipients are required to establish performance measures based on the goals of the Act and target populations' needs and report their compliance or non-compliance via APRs. The three strategic goals are (a) obtaining and maintaining permanent housing, (b) increasing skills and income, and (c) achieving self-sufficiency and independence. The following MVHAA key performance indicators were used to measure whether a program had achieved the Act's goals: (a) at least 61% of PLs obtained permanent housing; (b) 17% of PLs obtained employment; (c) 75% of PLs achieved at least one of their work plan goals; (d) 75% of PLs accessed mainstream services (Burt & Trutko, 2003; Khadduri, 2005; HUD, 2006; HUD, 2005).

Accordingly, only 37% of all programs complied with the MVHAA key performance indicator regarding PLs in permanent housing; 37% with the key performance indicator regarding in employment; 27% complied with the key performance indicator related to educational, academic, and / or vocational skills; 10% complied with the key performance indicator related to economic self-sufficiency; and 40% complied with the key performance indicator related to increased access to mainstream services. These findings clearly demonstrate that NP programs for the homeless in SJ PR do not achieve the service outcomes expected under the provisions of the MVHAA. The goals established by HUD (a) obtaining and maintaining permanent housing, (b) increasing skills and income, and (c) achieving self-sufficiency and independence, are not realized and programs are overwhelmingly ineffective. The findings also suggest that corrective action is necessary, if homelessness is to be addressed successfully. The implications of these, and other findings, are discussed at length in the conclusion under (a) policy, (b) budget and finance, (c) operations, (d) staffing, (e) services, and (f) legal implications.

Research question 2: How, and for what, do programs use MVHAA government funding? MVHAA funds are to be used by programs in services designed to achieve the Act's three strategic goals. Services deemed appropriate under the MVHAA include the following (a) life skills development, (b) alcohol and drug abuse related services, (c) mental health related services (crisis intervention), (d) AIDS related services, (e) other health care services, (f) education, (g) housing placement and / or assistance, (h) employment assistance, (i) child care, and (j) and other appropriate services needed to achieve the goals of the Act. Use of funding is considered to be in conformity with the Act if 75% or more of the MVHAA funding is used for services deemed appropriate under the Act (HUD, 2008).

According to findings, 76% of programs did not comply with the above MVHAA standard. In programs that did not comply, 48.8% of MVHAA funding was used for administration, 37.59% for general welfare, and only 13.2% was used for life skills development, housing employment, education and supportive services. According to the Act, programs are allowed to use 5% in administration. In programs that complied, a greater and more even distribution of the funding was evidenced. Nevertheless, in these programs, 15% of the funds were still used for inappropriate services.

Among all programs, 38.2% of all MVHAA funding was used for administration, 31.4% was used in the area of general welfare, and 27.7% of the total funding was used for core services, such as housing placement or assistance (5.5%), alcohol and drug abuse related services (5.1%), mental health related services (4.5%), life development skills (2.8%). education (2.7%), employment (2.7%), child care (2.1%), AIDS related services (1.9%), and other health care services (0.3%). The remaining 2.7% were used in services deemed inappropriate under the Act, such as social activities (2.0%), legal matters and referrals (0.3%), transportation (0.2%), and recreational activities (0.1%). Consequently, funding was illegally used for administration and other services deemed inappropriate under the MVHAA and not satisfactorily directed to services deemed appropriate under the Act. Corrective action is therefore needed to minimize the misuse of public funds.

Research question 3: How do program directors' levels of MVHAA knowledge influence program effectiveness? A one-sample Chi-square test was conducted. The results were $X^2 = (18, N = 38) = 39.15, p < .01$. The findings of the Chi-square suggest that there is an association between program directors' MVHAA knowledge and program effectiveness, i.e., between program directors' MVHAA knowledge and program compliance with MVHAA key

performance indicators. The findings suggest that lower levels of program directors' MVHAA knowledge are associated with programs that are not effective, and higher levels of program directors' MVHAA knowledge are associated with programs that operate more effectively. This finding infers that NP program directors and key NP program personnel must receive immediate MVHAA training with a view to improve program effectiveness.

Research question 4: How do program directors' levels of MVHAA knowledge influence the use of funding? A one-sample Chi-square test was conducted. The results were $X^2 = (10, N = 38) = 33.908, p < .01$. The results suggest that there is evidence of an association between program directors' MVHAA knowledge and the use of funding. The findings indicate that lower levels of program directors' MVHAA knowledge are associated with ineffective use of funding, and higher levels of MVHAA knowledge, are associated greater efficiency in use of funding. This finding also infers that NP program directors and key NP program personnel must receive immediate MVHAA training with a view to ensure appropriate use of funding.

Research question 5: What are the possible factors that may influence NP services and service outcomes that are not in compliance with MVHAA goals and objectives?

As stated above, the lack of a comprehensive knowledge of the MVHAA on the part of program directors is associated with both service outcomes and use of funding that fail to comply with MVHAA key performance indicators, and the overall provisions and goals of the Act. This contradicts the perception / beliefs of program directors, who overwhelmingly stated (68%) that knowledge of the MVHAA has no effect on program effectiveness and appropriate use of funding. They identified the following factors as possible causes for non-compliance (a) lack of resources (26%), i.e., not enough services or resources to achieve organizations' objectives; (b) difficult population (24%), i.e., the participants present difficult behavioral characteristics; (c)

assistentialism (18%), i.e., the failure of the organizations to empower participants; (d) lack of follow-up services (16%); (e) the need for service providers to have clear goals and structured plans (11%); and (f) cultural influences (5%), i.e., the culture of *Ay Bendito*, which affects the way in which services are offered. Societal prejudices were also considered as a cultural factor. The qualitative findings suggest that NP program directors and key NP program personnel must receive immediate MVHAA training, and must be made to understand the importance of MVHAA knowledge in relation to program effectiveness and appropriate use of funding. Moreover, program directors must understand that the MVHAA, the funding authority, and not individual NP programs, sets the performance goals and indicators. The NP programs are therefore accountable to the public.

Conclusions

The purpose of this study was to create a new body of knowledge expressly related to the effectiveness of NP organizations and the use of funding based upon MVHAA criteria and program directors' knowledge of these criteria. It was hypothesized that non-compliance is related to NP directors' limited working knowledge of the Act and / or its purposes. The study explored and examined the associations that exist among NP program directors' level of knowledge of the MVHAA and NP program effectiveness and use of funding. It also identified possible factors related to noncompliance by NP programs with MVHAA goals and objectives from the perspective of program directors.

In terms of service outcomes and MVHAA key performance indicators, only 37% of all programs complied in the area of permanent housing, 37% complied in the area of employment, 21% complied in the areas of increased educational / vocational skills for PLs, 10% complied in

the area of increased self-sufficiency, and 48% complied in the area of increased access to mainstream services. In terms of use of funding, only 24% of all programs complied with MVHAA standards and used funding for services deemed appropriate under the Act, i.e., for services that advance MVHAA strategic goals. In terms of MVHAA knowledge only 26% of program directors demonstrated knowledge at the Projection level, and there appears to be a strong association between this knowledge and program effectiveness and use of funding. Finally, program directors overwhelmingly denied the importance of MVHAA knowledge and offered other reasons for non-compliance with the strategic goals and key performance indicators established under the Act.

Implications. The purpose of this research was to create a new body of knowledge expressly related to the effectiveness of NP organizations and the use of funding based upon MVHAA criteria and program directors knowledge of these criteria. The implications of the findings are multifaceted and have the potential to impact programs in the following areas (a) policy, (b) budget and finance, (c) operations, (d) staffing, (e) services, and (f) legal implications. These areas are addressed below.

In terms of policy, the findings suggest that there is a need for programs to reassess organizational missions, strategies, goals, and plans to conform to the MVHAA's strategic goals. This implies a reorientation from the general welfare approach to the specific goals of permanent housing, employment, and self-sufficiency. It also involves confronting the problems of assistentialism and cultural attitudes, which were identified by program directors as primary causes for non-compliance. These findings confirm Colón-Soto's (2005) suggestions related to the need to address the issue of assistentialism. A recurring problem for organizations is the general failure of employees to empower participants or the inability / unwillingness of

participants to take action for themselves. The local culture of *Ay Bendito*, i.e., 'you poor thing' syndrome, reinforces assistentialism. This lack of empowerment is a barrier in achieving the MVHAA goal of self-sufficiency.

In terms of budget and finance, there is a need for programs to re-evaluate the use of funding in the area of services and to redirect funds to provide the core services prescribed by the MVHAA. This infers the elimination of services that are not eligible for funding under the Act. It also presupposes the reduction of funding for administrative purposes to less than 5%. The problem of insufficient resources, cited by program directors as a factor that affects compliance, may then be superfluous.

In terms of operations, there is a need for programs to establish guidelines, structures, and procedures to ensure that services deemed appropriate under the Act are provided. This presupposes an evaluation of the population's needs versus available services in the community, and the creation of programs that meet said needs while conforming to the Act's mandate. The findings indicate that the complexity of the homeless population is a factor that may influence compliance. The lack of a detailed needs assessment of the homeless population frustrates a correct formulation of the understanding of the problem and affects the establishment of program guidelines and structures. Burt (2003) indicates that there is a relationship between the variables of recurring homelessness and program effectiveness and monitored certain types of individuals who are particularly vulnerable to chronic homelessness. He discusses these factors and their possible influence on the non-effectiveness of programs. Burt proffers that compliance requires the right planning and mix of services and therefore a lack of planning by service providers, which was inferred by program directors' responses, can influence the success of the program

implementation. The findings reinforce that planning must be in accordance with the goals, objectives and provisions of the Act.

In terms of staffing, existing personnel need on-going training related to the Act's goals and purposes and moreover, to MVHAA key performance indicators. This confirms Colón-Soto's (2005) recommendations regarding the training of NP program staff in the public policy of the MVHAA. It also necessarily includes requiring staff to create individual work plans for participants that include the three MVHAA strategic goals. It may also infer that some job positions become obsolete, including welfare workers, social activity coordinators, etc. In terms of legal implications, programs need to re-examine their legal, regulatory, and contractual obligations to HUD, and the potential effects of non-compliance on program continuity as well as any ethical and legal implications in regard to misuse of federal funding.

This study goes beyond the explorative design of past research by demonstrating that there is evidence of an association between the level of MVHAA knowledge of program directors, program effectiveness, and use of funding, i.e., between the level of knowledge that program directors have of the MVHAA and program compliance with MVHAA key performance indicators and the overall goals and objectives of the Act. The lack of comprehensive knowledge of the Act appears to be a major contributor to poor service outcomes and inappropriate use of funding. The findings highlight other possible factors that may affect compliance, but these may be redundant if the principal findings and implications are addressed.

In terms of limitations, this study relied heavily upon the responses of NP program directors, and, in part, this may have had an impact on the findings, and the interpretation of the findings. Nevertheless, it is doubtful that program directors would have deliberately minimized

program successes. Indeed, if program achievements were exaggerated by program directors in their responses, the results would nevertheless not be significantly distorted.

Recommendations

Recommendations include immediate action strategies, MVHAA knowledge training, monitoring for programs, monitoring at state and federal level, restructuring of programs, prevention strategies and follow-up strategies.

Immediate action strategies. The following action strategies should be implemented immediately and include: (a) required MVHAA training for all service providers; (b) required workshops for all service providers directed toward the promotion of participant empowerment, and the eradication of assistentialism; (c) internal audits of service outcomes, program implementation and use of funding to ensure compliance with the MVHAA; and (d) internal redistribution of funding as necessary to ensure compliance with MVHAA use of funding standards.

MVHAA knowledge training. Since MVHAA knowledge is essential for program effectiveness, HUD should develop a compulsory certification process whereby all key NP program personnel must attend seminars and training. This would consequently promote greater program compliance with the provisions of the Act. The MVHAA should be translated into Spanish and bilingual seminars should be provided.

Monitoring at program level. Service providers should implement an ongoing process of monitoring and evaluation throughout the life of the programs, in order to provide feedback on whether the programs are in compliance with the Act. Grant recipients already are required to establish performance measures based on the goals of the Act and the target populations' needs and report their compliance or non-compliance via APRs to HUD. A continuous reporting and

statistical system should be set up to derive the necessary information needed for evaluation. Service providers should implement a remuneration system in which program directors and key personnel are rewarded for the achievement of MVHAA key performance indicators. Additionally, annual internal audits should be used to ensure compliance.

Monitoring at state and federal level. Government officials should implement an ongoing process of monitoring and evaluation. The on-going monitoring and evaluation should consist of three major components (a) needs assessment, (b) experience feedback, and (c) the effective use of the APR as a compliance mechanism, as opposed to its current status as a mere formality. It is essential to conduct ongoing needs assessments, i.e., to identify changes in the nature and extent of homelessness by identifying specific locations and populations affected by the problem. It is important to note that different subgroups in the homeless population have different type of needs. It is necessary to ascertain from the homeless themselves whether the needs of the homeless population are being met by the service providers in SJ PR.

Experience feedback occurs when the problem / solution is continuously fine-tuned by the knowledge and experience acquired through the implementation and evaluation of programs. Ongoing restructuring is needed. Currently, key performance indicators are set and required in the APR. However, local and federal government officials should monitor more closely the service providers as to the key performance indicators and understand the reasons for noncompliance.

Additionally, funds should be tied to actual service outcomes, and funds should be assigned for specific purposes, e.g., 10% of funds can only be used for childcare purposes. Performance monitoring should have two levels: (a) *Novice* level, in which service providers are not penalized for not achieving service outcomes but are assisted in implementing the provisions

of the Act, and (b) *Advanced* level, in which service providers are held accountable for service outcomes.

Prevention strategies. Prevention strategies are necessary to reduce homelessness. Burt (2006b) described two different groups of homeless people: (a) *literally homeless* (i.e., individuals or families who do not have adequate living conditions), and (b) *at risk population* (i.e., individuals or families who are at risk of becoming literally homeless). Funds and services should be assigned to the *at risk population*. Further research is necessary to understand the nature and extent of the *at risk population* and determine the way programs can tackle the needs of this group and the impact that this may have on reducing homelessness.

Follow-up strategies. Service providers should focus on 'graduating' participants to ensure that participants do not become dependent upon programs or chronically homeless. Services should be directed towards assisting participants in maintaining housing, employment, and increasing academic skills and self-sufficiency. Additionally, ongoing life development skills seminars and workshops (e.g., seminars in personal finance, cooking on a budget, emotional intelligence, etc.) should be offered to participants. Further research is needed to understand chronic homelessness and the possible remedies.

Restructuring of programs. The current focus of programs should be restructured to a measurable and adaptable process in which each service is customized to each group within the homeless population and in accordance to individual participant needs. Measurable steps and procedures are needed for compliance with MVHAA goals. Additionally, in order to achieve better service outcomes, service providers should customize the programs by group types with different tracks for different persons, e.g., persons with mental health conditions, persons who

are involved in substance abuse, persons who are HIV positive, women survivors of domestic violence, etc.

The first such measurable step is to screen participants and assign them to specific tracks with individual work plans. This would save time, resources and money. For example, participants in the substance abuse track would first need to be fully detoxed and rehabilitated before being able to start on the housing track. A participant in the mental health conditions track should be referred to ASSMCA. Different tracks would create an opportunity for service providers to partner with other service providers / government agencies that specialize in a specific area and to jointly provide services to meet specific needs. The service providers could either refer participants to specialized organizations or obtain additional funding under other statues.

Service providers should establish series of measurable procedures to increase service outcome compatibility with MVHAA goals. After screening participants, the following homeless track model is suggested: (a) *transitional housing and supportive services track*, in which participants are found temporary housing, and then assessed to determine the supportive services needed; (b) *beginners' level - life development skills track*, in which a series of seminars and trainings are used to develop the life skills of the participants in the areas of housing, social skills, self-empowerment, and other basic skills; (c) *educational, academic, and vocational skills track*, in which participants undergo a series of psychological tests and assessments to determine and prepare for suitable vocational options; (d) *intermediate level life development skills track*, in which a series of seminars and trainings are used for the ongoing development of life skills; (e) *employment track*, in which participants work closely with the employment officer to seek and obtain employment; (f) *advanced level life development skills track*, in which a series of

seminars and workshops geared towards self-sufficiency are used to develop life skills; (g) *permanent housing track*, in which participants, with support of the staff, seek and obtain permanent housing, and are assisted through ongoing monitoring of participants to ensure that participants do not relapse into homelessness.

Further research is needed to determine the most appropriate seminar / workshop mix to enhance the life skills of the homeless. It is suggested that research be conducted to determine the best organizational structure, procedures, and culture that can assist in transforming the homeless person into a self-sufficient individual with permanent housing. This, of course, must be based upon a 'needs assessment' of the homeless population served.

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Drogram	MVHAA Knowledge		Program Effectiveness		Use of Funding		
Program -	Score Level		Score			Score Use of Funding	
1	0	Ignorance	25	Noneffective	30	Inappropriate	
2	0	Ignorance	25	Noneffective	30	Inappropriate	
3	0	Ignorance	90	Effective	90	Appropriate	
4	0	Ignorance	5	Noneffective	0	Inappropriate	
5	0	Ignorance	5	Noneffective	0	Inappropriate	
6	0	Ignorance	5	Noneffective	0	Inappropriate	
7	4	Projection	25	Noneffective	30	Inappropriate	
8	4	Projection	25	Noneffective	30	Inappropriate	
9	0	Ignorance	5	Noneffective	30	Inappropriate	
10	0	Ignorance	45	Noneffective	30	Inappropriate	
11	0	Ignorance	25	Noneffective	30	Inappropriate	
12	0	Ignorance	10	Noneffective	0	Inappropriate	
13	8	Projection	15	Noneffective	50	Inappropriate	
14	8	Projection	95	Effective	80	Appropriate	
15	8	Projection	95	Effective	80	Appropriate	
16	0	Ignorance	0	Noneffective	0	Inappropriate	
17	0	Ignorance	25	Noneffective	30	Inappropriate	
18	0	Ignorance	15	Noneffective	30	Inappropriate	
19	0	Ignorance	15	Noneffective	30	Inappropriate	
20	0	Ignorance	15	Noneffective	30	Inappropriate	
21	8	Projection	95	Effective	80	Appropriate	
22	0	Ignorance	10	Noneffective	30	Inappropriate	
23	0	Ignorance	10	Noneffective	30	Inappropriate	
24	0	Ignorance	50	Noneffective	30	Inappropriate	
25	8	Projection	100	Effective	80	Appropriate	
26	8	Projection	95	Effective	80	Appropriate	
27	8	Projection	95	Effective	80	Appropriate	
28	8	Projection	95	Effective	80	Appropriate	
29	0	Ignorance	25	Noneffective	30	Inappropriate	
30	0	Ignorance	10	Noneffective	30	Inappropriate	
31	0	Ignorance	10	Noneffective	0	Inappropriate	
32	0	Ignorance	10	Noneffective	30	Inappropriate	
33	0	Ignorance	10	Noneffective	30	Inappropriate	
34	8	Projection	95	Effective	70	Inappropriate	
35	8	Projection	95	Effective	90	Appropriate	
36	0	Ignorance	25	Noneffective	30	Inappropriate	
37	0	Ignorance	25	Noneffective	30	Inappropriate	
38	0	Ignorance	25	Noneffective		Inappropriate	

Program Knowledge, Effectiveness, and Use of Funding

Program	Left the Program	Permanent Housing	Economically self-sufficient	Employment	Educational skills	Mainstrean Services
1	22%	16%	3%	3%	0%	16%
2	26%	7%	0%	0%	0%	0%
3	4%	100%	100%	100%	100%	100%
4	28%	0%	0%	0%	0%	0%
5	24%	0%	0%	0%	0%	0%
6	29%	0%	0%	0%	0%	0%
7	4%	0%	0%	0%	0%	0%
8	25%	44%	11%	11%	0%	50%
9	0%	0%	0%	0%	0%	0%
10	32%	14%	0%	14%	14%	100%
11	23%	22%	0%	0%	0%	100%
12	52%	0%	0%	0%	0%	0%
13	20%	100%	18%	18%	0%	100%
14	50%	99%	51%	51%	100%	100%
15	50%	100%	0%	100%	100%	100%
16	93%	7%	7%	0%	7%	14%
17	40%	25%	0%	0%	0%	100%
18	5%	0%	0%	0%	0%	100%
19	52%	9%	0%	0%	0%	9%
20	1%	100%	100%	100%	0%	100%
21	6%	60%	0%	0%	0%	60%
22	13%	48%	0%	0%	0%	17%
23	29%	40%	0%	0%	0%	80%
24	30%	17%	0%	17%	17%	100%
25	50%	100%	0%	100%	100%	100%
26	50%	100%	0%	100%	100%	100%
27	50%	99%	51%	51%	100%	100%
28	0%	0%	0%	0%	0%	0%
29	0%	0%	0%	0%	0%	0%
30	16%	33%	0%	0%	0%	33%
31	0%	0%	0%	0%	0%	0%
32	7%	80%	80%	0%	0%	80%
33	8%	100%	100%	100%	100%	100%
34	8%	100%	0%	0%	0%	100%
35	48%	100%	42%	100%	100%	100%
36	47%	71%	14%	29%	71%	71%
37	43%	67%	17%	33%	67%	67%
38	19%	53%	0%	25%	53%	53%

Service Outcome Achievements by Program