

A NEW DEAL FOR YOUTH

The Hon. Marcia L. Fudge, Secretary

U.S Department of Housing and Urban Development

451 7th Street, S.W.,

Washington, DC 20410

RE:FR-6284-N-01 Implementation of the Fostering Stable Housing Opportunities Amendments

Dear Secretary Fudge,

On behalf of New Deal for Youth, we are writing to thank The U.S. Department of Housing and Urban Development (HUD) for listening directly to youth with lived experience. The Fostering Stable Housing Opportunities (FSHO) amendments that HUD implemented on January 24, 2022 were written over the course of three years by foster youth and alumni of care along with their champions in the U.S. Congress.

A New Deal for Youth (ND4Y) is a youth-led, youth-centered effort advocating for the creation of new systems, policies, investments, and structures that reimagine life for young people in America. New Deal for Youth Changemakers are a cohort of young leaders between the ages of 15 and 32 from across the country. We are advocates and organizers who work across a range of issues facing our communities, including housing and economic justice.

We ask that HUD continue to work directly with youth and alumni of foster care to ensure that the implementation of FSHO creates a predictable pathway to economic independence and housing stability for their brothers, sisters, and siblings in care nationwide. We urge HUD to avoid making any significant changes to FSHO unless those changes have been generated by or vetted by youth and alumni of care.

The COVID-19 pandemic is a harsh reminder that housing issues don't exist in a vacuum. The housing and homelessness crises cannot be separated from parallel issues such as mass incarceration, gender-based violence and discrimination, and racial inequality. Policies to address the housing crisis must therefore also address longstanding inequities and an economy which is built on leaving many people behind. The issue of housing assistance to foster youth is no exception.

The Biden-Harris Administration has made their commitment to advancing racial equity and ending COVID-19 clear in their executive orders directed at federal agencies. The COVID-19 pandemic has impacted racial equity in all aspects and particularly in areas of housing. Housing

insecurity and homelessness hit alarming levels at the height of the COVID-19 crisis. The U.S. [Department of Housing and Urban Development's \(HUD\) 2020 Annual Homeless Assessment Report \(AHAR\) to Congress \(Part 1\)](#) shows that 580,466 people were counted as homeless during the 2020 Point-in-Time count, representing a 2.2% increase over 2019. This marks the fourth consecutive annual increase in homelessness, following sustained reductions between 2010 and 2016. The report points to a 7% increase among individuals experiencing unsheltered homelessness. Our Changemakers and other young people also face racial discrimination in access to housing. For instance, we have heard about hotels and other accommodations refusing to accommodate Native Americans. Many rely on hotels, motels, and other temporary accommodations for safety. The added layer of racial inequity in access to housing means that young people of color disproportionately experience homelessness.

Nan Roman, President and CEO of the National Alliance to End Homelessness said “These results were tabulated practically on the eve of the COVID-19 pandemic, and they show a system under-resourced to meet the needs of people experiencing and at risk of homelessness, much less the coming consequences of the global pandemic and recession.” The shelter-in-place orders during the early pandemic overlooked unhoused people, including unhoused young people, who have struggled more to secure stable housing. Public health efforts during the pandemic have continuously failed to account for and provide services to unhoused youth. For instance, the federal government allocated four tests per household, and USPS only sent tests to those with a residential address. Without stable housing, young people’s health is also at risk.

FSHO eliminates long-standing flaws in HUD’s Family Unification Program (FUP) vouchers for youth (FUPY) and codifies the Foster Youth to Independence (FYI) Initiative “on demand” distribution mechanism for FUPY vouchers. FSHO also codifies the FUP – Family Self-Sufficiency (FSS) Demonstration program carried out by HUD at the direction of the U.S. Congress in 2016.

Foster youth and alumni of care worked for over six years to design FSHO and FYI based on their lived experience, painstaking research of peer-reviewed literature and HUD regulations, and the FUP-FSS Demonstration and similar Public Housing Agency (PHA) efforts to couple FUP and FSS that have been underway in communities throughout the U.S. for more nearly two decades.

Further, vouchers are a critical and successful tool in preventing and ending homelessness for young people as proven by vouchers targeted to youth who were involved in the child welfare system. Building on this success, vouchers should be available at an on-demand basis for all young people experiencing any form of homelessness whether or not they have ever been involved in the child welfare system.

Below please find answers to the three questions on certain provisions of FSHO that HUD specifically mentioned in the January 24, 2022 Federal Register Notice:

Question 1. In order to receive an extension of FUPY/FYI assistance, should the cut-off for requiring a youth to enroll in the FSS program be the 36-month mark or is a different cut-off more appropriate based on the requirements of the FSS program?

Answer: No. Due to a long-standing failure at the national level to universalize the Family Self-Sufficiency Program (FSS) for tenants participating in HUD’s Housing Choice Voucher Program (and thus, FUP/FYI) the reach of the FSS program and the timing of available spots varies

considerably between PHAs. Thus, PHAs should continue to offer FSS participation to youth on a rolling basis, as available, throughout a young person's participation in FUPY/FYI regardless of the length of time available in their FUPY/FYI voucher assistance.

Question 2. Should HUD establish a minimum number of classes or credits that a youth must be enrolled in or a minimum number of hours that a youth must work in order to receive an extension of FUPY/FYI assistance under this provision?

Answer: No. Enrollment matters related to coursework and the minimum number of classes or credit hours to satisfy academic progress is arranged between students and the professionals employed by institutions of higher learning and training institutions, which is beyond the scope of the U.S. Department of Housing and Urban Development and the state and local housing agencies HUD contracts with to administer housing assistance. The statutory language in the FHSO is clear: For the purpose of extending FUPY/FYI public housing authorities must simply verify that a student is enrolled.

Question 3. Should HUD establish a maximum number of classes or credits or a maximum number of work hours that a PHA may require in order for a youth to receive an extension of FUPY/FYI assistance under this provision?

Answer: No. Enrollment matters related to coursework and the maximum number of classes or credit hours that an individual student should assume in an academic term is arranged between students and the professionals employed by institutions of higher learning and training institutions, which is beyond the scope of the U.S. Department of Housing and Urban Development and the state and local housing agencies HUD contracts with to administer housing assistance. HUD should prohibit PHAs from setting local minimums for the number of classes, credits, or work hours required for a youth to receive an extension of FUPY/FYI assistance under this provision. The youth-written statutory language in FSHO is clear. For the purpose of extending FUPY/FYI public housing authorities must simply verify that a student is enrolled in an "institution of higher learning" or a "postsecondary vocational institution." It cannot be emphasized enough that housing is required for individuals' safety and it is our view that safety should not be tied to enrollment and work. Without the safety and stability that housing provides, it is challenging to complete coursework.

Thank you for this opportunity to comment on this invaluable solution to ending homelessness for youth aging out of foster care. If you have additional questions on any of our recommendations, please email newdealforyouth@clasp.org.