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Submitted via [Regulations.gov](https://www.regulations.gov)

Department of Housing and Urban Development
2415 Eisenhower Avenue
Alexandria, VA 22314

Re: Notice of Research Justifying Additional Incentives for Certain Activities To Reduce Homelessness, Docket Number FY-6628-N-01

Introduction

The National Network for Youth (NN4Y) submits this comment in response to the U.S. Department of Housing and Urban Development's (HUD) *Notice of Research Justifying Additional Incentives for Certain Activities to Reduce Homelessness* (Notice). Founded in 1974, NN4Y is a national nonprofit organization representing over 300 youth homelessness service providers and young people across the country. Our members operate outreach programs, shelters, transitional and permanent housing programs, host homes, affordable housing, and homelessness prevention initiatives in urban, suburban, rural, and tribal communities nationwide. These programs serve youth, young adults, and young parent families up to age 25.

We support HUD's recognition that federal funding should support a broader range of interventions to address homelessness, and that transitional housing, supportive services, and other interventions can have an important role to play. At the same time, the research and experience of youth homelessness providers do not support replacing one overly prescriptive national approach with another. Additionally, the research cited in the Notice does not fully justify treating the preferred interventions as categorically "proven effective" across populations, particularly for youth and young adults. Evidence that an intervention benefits a particular population, in a particular setting, or on a particular outcome does not necessarily establish its effectiveness for other populations or justify prioritizing it broadly. The evidence also does not categorically establish that Housing First is ineffective for all people experiencing homelessness, nor does it exclusively support conditioning housing on treatment or service participation. For young people in particular, the appropriate intervention depends on developmental stage, individual circumstances, disability, safety, family relationships, behavioral health needs, employment and education goals, and the young person's own preferences.

NN4Y therefore supports allowing for a broader continuum of evidence-based housing and service options, with important safeguards to ensure that incentives do not become de facto mandates for particular service models or conditions on housing. HUD should also recognize that youth-specific programs require youth-specific evidence, measures, and approaches.

We ask HUD to revise its determinations and any resulting funding incentives to:

1. Recognize transitional housing with supportive services as one effective intervention for youth and other populations for whom it is appropriate, while continuing to support permanent housing and Housing First approaches as important components of the continuum.
2. Avoid using funding incentives in a manner that effectively requires every community to adopt a single intervention model.
3. Support individualized supportive services and case management without making all housing models contingent upon treatment or service participation.
4. Ensure that partnerships with law enforcement and first responders are targeted, trauma-informed, focused on connection to services and safety, and don't force youth providers to be at odds with other statutes.
5. Recognize youth-specific evidence and outcomes when determining which interventions are proven effective for youth.

Successful Approaches to Youth Homelessness Require a Flexible Continuum of Services

Transitional Housing and Supportive Services Are Important Components of a Continuum

NN4Y supports transitional housing with supportive services as an effective strategy, particularly for youth, families, and survivors of domestic violence. However, transitional housing and supportive services should be available as options within a balanced continuum rather than elevated as the preferred interventions for all or most people experiencing homelessness.

For many young people, transitional housing can be an effective, developmentally appropriate option for exiting homelessness and building lasting stability.¹ Providers report

¹ Covenant House International, National Network for Youth & SchoolHouse Connection. *Youth-Supportive Transitional Housing Programs as an Essential Resource for Addressing Youth Homelessness*. (2021).

that young people can make significant progress toward skill-building, education, employment, improved behavioral health, and navigating the transition to adulthood when programs have the resources and flexibility to provide developmentally-appropriate services for the time necessary to achieve these goals.

At the same time, transitional housing is not the end-all-be-all. Some young people may be facing more challenging health, mental health, or disability-related circumstances, and for them, permanent housing options are more appropriate.

The key for a truly effective continuum of services for young people is flexibility. Young people are at an inherently transitional stage of life. It is not unusual for a young person's initial assessment to indicate that transitional housing may be appropriate, only to find that they need the stability and longer-term support of permanent housing, or vice versa. However, providers under HUD are typically unable to transition young people from one housing type to another, meaning a young person could be stuck in an inappropriate setting so as not to be exited back to homelessness.

As young people develop, learn, and work to address the root causes of their homelessness, their circumstances and needs can evolve. It is critical that they are not expelled from services because of the normal shifts that come with this stage of life. Our homelessness system must remain flexible enough to respond to their needs and offer a broad continuum of services to effectively serve everyone.

HUD's Housing First Claims About Youth Are Not Fully Supported

There is legitimate value in examining whether the federal homelessness system has invested sufficiently in transitional housing and supportive services—NN4Y agrees that, since 2013, it has not. However, HUD's current proposal to make a dramatic shift from one model to another is akin to what happened in 2013, when the majority of resources were shifted away from transitional to permanent housing, setting up the severe imbalance that negatively impacts the effectiveness of our homelessness system today. A more appropriate conclusion is that the homelessness system needs a balance of interventions.²

HUD's proposal is based on the broader claim that its implementation of Housing First has "profoundly failed" to deliver on its promises. However, the evidence presented does not support such a categorical conclusion. Indeed, HUD's Notice cites research demonstrating

² Munthe-Kaas HM, Berg RC, Blaasvær N. *Effectiveness of interventions to reduce homelessness: a systematic review and meta-analysis*. (2018). Campbell Systematic Reviews; 14(1):1-281. doi: 10.4073/csr.2018.3

that Housing First can improve housing stability for homeless youth with mental illness.³ The study HUD cites was a randomized trial involving youth ages 18 to 24. Youth receiving Housing First were stably housed for approximately 65 percent of observed days compared with 31 percent for youth receiving treatment as usual. The authors concluded that Housing First was associated with improved housing stability and specifically recommended further research into adaptations of the model for youth.

HUD instead focuses on secondary outcomes from that study to argue that Housing First did not adequately advance employment or self-sufficiency. Even accepting that those outcomes warrant further examination, they do not establish that Housing First is totally ineffective for youth, nor do they establish that transitional housing must replace it.

The youth-specific research and experience of youth providers support a more nuanced conclusion: Young people benefit from flexible, low-barrier access to multiple intervention types, including permanent housing, transitional housing, rapid rehousing, supportive services, outreach, and other youth-specific approaches.

The question should not be whether communities choose Housing First or transitional housing. The question should be whether communities have the resources and flexibility to provide an array of interventions to best fit the needs and goals of each young person.

Incentives Should Expand the Continuum, Not Replace One Prescription With Another

The most important opportunity presented by this Notice is the opportunity to correct an imbalance in the CoC. HUD documents a substantial decline in transitional housing capacity over time and notes that recent CoC competitions have provided very limited opportunities for transitional housing and supportive services only projects. For youth providers, restoring access to a broad range of interventions is important.

However, restoring that balance does not require abandoning permanent housing or Housing First. Communities should have a real continuum of options. Young people should have meaningful choices within that continuum. Providers should have the flexibility to match interventions to the evolving needs and goals of the young people they serve.

³ Kozloff, N., Adair, C.E., Palma Lazgare, L.I., et al. “*Housing First*” for Homeless Youth With Mental Illness. (2016). *Pediatrics*, 138(4):e20161514

When a young person first comes to us, we're often making a housing assessment based on what we know at that moment. They usually don't feel comfortable sharing everything right away, especially if they've had difficult experiences with adults or systems. As we build trust and they start to feel safer, we learn more about what they've gone through and what they need and may realize that a different housing option would be a better fit. We also have situations where the only available bed is in a different housing program than what we think would actually be the best fit for that young person. We have to either turn them away, back to homelessness, or place them in that program that may not meet their needs as well as another option would. If we had the flexibility to move them to a more appropriate housing type when space becomes available or as we get to know them better, we could make sure they are in the housing that best meets their needs and helps them achieve self-sufficiency.

— Youth homelessness provider in the Mid-Atlantic

Housing and Services Must Remain Accessible and Youth-Centered

Not All Housing Should Be Conditioned on Treatment or Service Participation

HUD proposes to incentivize supportive service participation agreements designed to engage participants in individualized services. While NN4Y supports individualized case management planning and clear expectations,⁴ HUD should distinguish between engagement in a service plan and conditioning access to housing on compliance with that plan. An array of different program types can be appropriate.

Youth homelessness providers understand the value of accountability, structure, consistent engagement, and individualized goals, and indeed, all implement them. Young people can benefit tremendously from programs that establish clear expectations around education, employment, appointments, life skills, behavioral health, and other goals.

At the same time, young people experiencing homelessness frequently have histories of trauma, disrupted relationships, abuse, neglect, system involvement, and unmet behavioral and physical health needs. Missed appointments, relapse, sudden disengagement, changes in goals, and periods of instability can be a normal and expected part of the climb to achieving

⁴ Milburn NG, Rice E, Petry L. *Understanding Homelessness Among Young People to Improve Outcomes*. (2024). *Annu Rev Clin Psychol*;20(1):457-479. doi: 10.1146/annurev-clinpsy-080921-081903.

stability. Effective youth-serving programs respond to these moments with persistence, understanding, flexibility, and additional support. They do not agree that a young person should lose housing because they experience a temporary setback along the way.

HUD should clarify that incentives for participation agreements do not authorize or encourage the termination of housing solely because a participant declines services or fails to meet an individualized service expectation, except where otherwise permitted by applicable program rules and law for legitimate housing-related reasons.

Case management and supportive service agreements should be:

- Individualized and developmentally appropriate.
- Developed with the young person's meaningful participation.
- Focused on the young person's goals.
- Flexible enough to accommodate changing circumstances.
- Designed to increase engagement rather than punish disengagement.
- **Clearly distinguished from conditions that determine whether a young person is allowed to remain housed.**

This distinction is particularly important for youth. The goal should be to use housing as a platform for development and stability, not as leverage to compel compliance.

We work with each young person to set individualized goals, whether that's finding a job, returning to school, or building independent living skills, but progress isn't always a straight line. When a young person misses appointments or struggles to meet their goals, we work with them to understand what's getting in the way and what they need to get back on track. Taking away their housing would only make it impossible to move forward and would completely destroy trust and their desire to participate in services. Accountability means helping young people work toward their goals, not making their housing dependent on getting everything right all the time.

– Youth homelessness provider in the Northeast

Partnerships With Law Enforcement Must Be Approached Carefully

HUD proposes to recognize coordination with law enforcement and first responders as a proven effective strategy. Some youth providers have relationships with local first responders and public safety agencies and work as partners in particular circumstances. However, law

enforcement involvement should never become a default component of homelessness services or a substitute for adequately funding homelessness professionals in outreach, behavioral health care, crisis response, shelter, transitional housing, or permanent housing.

Many young people experiencing homelessness have prior traumatic experiences with law enforcement or other systems. Increased law enforcement involvement can therefore have unintended consequences for engagement, particularly when young people perceive services as connected to surveillance, punishment, or criminalization.

Furthermore, our country's primary youth homelessness program was enacted in 1974 with the Runaway and Homeless Youth Act (RHYA), administered by the U.S. Department of Health and Human Services. This program shifted the federal approach to supporting runaway and homeless youth away from punitive responses and toward youth-centered, community-based approaches. Many youth providers that are funded by HUD are also funded by RHYA, and RHYA statute has strict protections for young people against any data sharing or over-involvement with law enforcement. If HUD's approach becomes overly reliant on law enforcement involvement, then it could be putting youth providers at risk of violating their statutory requirements under RHYA.

HUD should clarify that partnerships with law enforcement and first responders are not intended to replace professional outreach, housing, behavioral health, and other homelessness services. It should also allow them to be voluntary where appropriate, flexible, trauma-informed, youth-centered, and focused on connecting young people to services and safety rather than criminalizing homelessness.

We've worked hard to build trust with local law enforcement so that when officers encounter a young person who is running away, experiencing homelessness, or otherwise in crisis, their first call is to us. We regularly connect with officers to make sure they know when and how to refer young people to our services, and we're available 24/7 to respond when a crisis comes up. When we get a call, our goal is to stabilize the situation, work with the young person and their caregiver to resolve the conflict, and find a safe alternative if returning home isn't possible. Having that relationship means officers know they have somewhere to turn, and young people have a chance to get the support they need without unnecessary involvement in the juvenile legal system.

– Youth homelessness provider in the Midwest

Youth-Specific Measures Are Needed Across the Continuum

A long-standing concern among youth providers is that HUD's outcome metrics are based on what is known to be appropriate for the broader, predominantly adult homelessness population and do not reflect developmentally appropriate outcomes for young people.

The developmental period extending through adolescence and young adulthood is characterized by substantial changes in education, employment, relationships, identity, health, and independent living skills, both for youth who are and are not experiencing homelessness. But for youth who have experienced abuse, neglect, family conflict, foster care, violence, exploitation, or other forms of trauma, services and outcome metrics specifically designed around these developmental and life circumstances are necessary.⁵

This is particularly important when HUD considers program outcomes such as employment, income, length of stay, or exits. A program that provides long-term housing to an older adult with a disabling condition should have different outcome metrics than a program serving an 18-year-old who is completing high school, a 20-year-old reconnecting with education or employment, or a young parent establishing an independent household.

HUD should therefore:

1. Evaluate youth programs using developmentally-appropriate outcomes.
2. Distinguish outcomes for young adults, young parent families, and older adults where appropriate.
3. Avoid using aggregate adult outcomes to determine the effectiveness of interventions designed for young people.

This approach would be consistent with Congress's recognition that the causes of homelessness are complex and that different populations have different needs.

Conclusion

Our federal homelessness system should provide communities with a broader range of options, including transitional housing, supportive services, and youth-specific interventions.

⁵ Wang JZ, Mott S, Magwood O, Mathew C, Mclellan A, Kpade V, Gaba P, Kozloff N, Pottie K, Andermann A. *The impact of interventions for youth experiencing homelessness on housing, mental health, substance use, and family cohesion: a systematic review*. BMC Public Health;19(1):1528. doi: 10.1186/s12889-019-7856-0.

The evidence and the experience of youth homelessness providers point toward a system that is more flexible, adequately resourced, and responsive to individual needs, not to a system that simply replaces one dominant model with another.

Young people experiencing homelessness are still developing the skills, relationships, education, employment, health, and supports necessary for adulthood. Many can and do achieve housing stability and independence when they receive the right combination of housing and services. Others will need longer-term assistance. The federal response should be capable of supporting both realities.

HUD's Notice recognizes that the causes of homelessness are complex and that Congress authorized multiple interventions to address the diverse needs of people experiencing homelessness. Therefore, HUD should narrow its determinations to the populations, program features, and outcomes actually supported by the cited research. Where youth-specific evidence is limited, HUD should acknowledge that limitation and support evaluation rather than characterize the approach as proven effective for young people.

No single housing or service model is appropriate for every person. HUD should ensure that communities have a well-funded continuum of evidence-informed options and the flexibility to determine what works for the young people they serve.

We urge HUD to revise its determination accordingly and to ensure that future CoC funding opportunities expand access to transitional housing, supportive services, street outreach, permanent housing, and other interventions without creating new requirements that undermine housing stability or restrict the choices available to young people and providers.