



Comment Template: HUD Equal Access Rule Change

Deadline to Submit: Monday, June 29, 2026 | Read [here](#) to learn more.

On April 28, the Department of Housing and Urban Development (HUD) posted a [proposed regulation change](#) to its Equal Access Rule. The proposed changes could have serious negative implications for LGBTQ+ youth in accessing housing.

The Equal Access Rule (EAR) is a critical regulation at HUD that ensures equal access to HUD-funded housing programs regardless of one's sexual orientation, gender identity, or marital status. The Trump Administration has proposed significant regulation changes that would:

- Replace sexual orientation, gender identity, and gender protections with "sex," which the Trump Administration defines as sex assigned at birth. This would eliminate regulatory protections to housing for LGBTQ+ youth, and especially transgender or gender non-conforming youth.
- Allow providers to require "reasonable assurances or evidence to establish a person's sex," opening the door to potential harassment, abuse, and re-traumatization for transgender and gender non-conforming individuals.

Anyone, from organizations to individuals, can submit a comment. To submit your comment:

1. Draft a **unique** comment using the template below. A unique comment means that your introduction and the main body of your comment is not identical to another comment.
2. Upload your comment [here](#) by either copy-pasting it or uploading a file. **Comments are due on Monday, June 29.**

Read our [blog post](#) published June 9, 2026 to learn more or feel free to email trinady.maddock@nn4youth.org with questions.

Template Comment

1. Header

At the top of your comment, paste this:

DATE

Submitted via Regulations.gov
Department of Housing and Urban Development
2415 Eisenhower Avenue
Alexandria, VA 22314

Re: Regulation Changes Over the Equal Access Rule, Docket Number FR-6518-P-01, RIN Number 2501-AE12

Dear Secretary Turner,

2. Introduce Yourself and Your Interest in this Issue

Feel free to use this as a guide—write whatever feels natural to you.

I am [your role/organization/affiliation/location] and I am writing to express strong opposition to the proposed changes to the FR-6518-P-01 Equal Access Rule issued by the Department of Housing and Urban Development (HUD).

[One to two paragraphs: What is your interest in this issue? Are you a housing provider, youth-serving org, young person with lived experience, social worker, advocate, community member, etc? What are your concerns about the change?]

3. Main Body of Your Comment

Use the personalization questions below to help you write the body of your comment. The more specific and unique, the better. Feel free to draw from the research and evidence from the sources and statistics at the end of this document.

[Questions to consider for your argument—answer at least one for your comment. Share specific examples!]

- If these changes occur, it may be harder for youth to access shelters in a way that is consistent with their gender identity, or they may be required to provide proof of their sex. What would the outcomes of this be?
- Do you have any direct experience *contradicting* HUD's claim that the Equal Access Rule currently harms housing providers' ability to operate safely and without risk to cisgender women?
- How do inclusive, affirming housing services improve outcomes for youth experiencing homelessness?
- If you have lived experience with homelessness as an LGBTQ+ young person, can you share an example of how receiving affirming services helped you exit homelessness? Or can you share an example of how lack of affirming services prolonged your homelessness?
- Why does this issue matter to you personally or professionally?
- What impact would changing the Equal Access Rule have on your community and the issue of homelessness?

4. Make Your Ask and Sign

End by making it very clear that you oppose HUD's proposed changes to the Equal Access Rule.

[The ask: Withdraw the proposed rule and retain the 2016 Equal Access Rule as it is currently written.]

For example: "For these reasons, I strongly urge HUD to withdraw this proposed rule. The 2016 Equal Access Rule is a critical protection for the most vulnerable people our programs serve. Weakening the Equal Access rule will not make shelters safer, and will leave many more youth/individuals experiencing homelessness without access to essential resources intended to help them."

[Sign your name or organization]

5. Submit Your Comment

To submit your comment:

- Click this link: <https://www.regulations.gov/document/HUD-2026-0529-0001>
- Click the blue "Comment" button under the rule title.
- Copy and paste your comment into the comment box or upload it as a file.
- You can also choose to submit a comment anonymously.

Statistics and Other Resources to Cite in Your Comment

Feel free to use the following materials if you would like to cite research to support your comment. You don't have to, but it helps.

LGBTQ+ Youth and Homelessness

- [LGBTQ+ youth are 120% more likely to experience homelessness](#) compared to non-LGBTQ youth.
- [Up to 40% of homeless youth identify as LGBTQ, while the general youth population is only 10% LGBTQ.](#)
- [26% of homeless LGBTQ youth report being forced out of their homes solely because of their sexual orientation or gender identity.](#)
- [LGBTQ Young Adults Experience Homelessness at More than Twice the Rate of Peers](#) – Chapin Hall
- [Homelessness and Housing Instability Among LGBTQ Youth](#) – Trevor Project
- [Defending the Equal Access Rule](#) – National Alliance to End Homelessness
- [LGBTQ+ Young People Face Higher Risks of Homelessness](#) – Covenant House
- [LGBT People and Housing Affordability, Discrimination, and Homelessness](#) – Williams Institute
- [Surviving the Streets of New York Research Report](#) – Urban Institute
- [LGBTQ+ Youth Homelessness](#) - NN4Y

Transgender Youth Experiencing Homelessness

- [38-39% of transgender youth have experienced homelessness or housing instability.](#)
- [1 in 5 transgender individuals have experienced homelessness at some point in their lives.](#)
- [Nearly 1 in 4 percent of unaccompanied youth experiencing homelessness identify as transgender or gender-questioning.](#)
- [2022 U.S. Trans Equality Trans Survey](#)
- [Federal Data Demonstrates the Need for Safe, Supportive, and Specific Housing for Gender-Expansive People](#) – Homelessness Research Institute
- [Equal Access for Transgender People](#) – HUD report supporting inclusive housing and shelters

- [Nationwide Survey Shows Widespread Discrimination Against Gender-Expansive People, Including in Emergency Shelters](#) – National Alliance to End Homelessness
- [How Many Adults and Youth Identify as Transgender in the United States?](#) – Williams Institute Report
- [Advocating for Transgender, Intersex, and Gender Nonconforming People’s Equal Access to Homeless Shelters](#) – Proskauer

Safety

- [National Consensus Statement of Anti-Sexual Assault and Domestic Violence Orgs in Support of Full and Equal Access for the Transgender Community](#) — The National Task Force to End Sexual and Domestic Violence
- There is no research-based evidence to support HUD’s assertion that the current Equal Access Rule harms cisgender women.

Suicide rates/mental health

[2025 U.S. National Survey on the Mental Health of LGBTQ+ Young People](#)

- 23 percent of transgender and nonbinary young people say they had been physically threatened or harmed due to their gender identity.
- 36% of LGBTQ+ young people seriously considered attempting suicide in the past year (2025).
- 10% of LGBTQ+ young people attempted suicide in the past year (2025).

Other Organizations’ Resources

- [Lambda Legal Template Comment for Youth Serving Organizations](#)
- [Lambda Legal Template Comment for Youth](#)
- View [A4TE’s Comment Portal](#) for an additional template and resource
- [National Housing Law Project’s legal analysis](#) of proposed changes