NATIONAL NETWORK for YOUTH

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Recommendations for USICH's New Federal Strategic Plan: Prevent and End Youth Homelessness

For youth experiencing homelessness, the climb to adulthood can be particularly steep. They need support to find their footing. As young people in homeless situations become adults, they need to be plugged into networks of support that power their growth and success. 4.2 million youth and young families experience homelessness each year in America -- with Black, Indigenous, and People of Color (BIPOC) and LGBTQ+ youth disproportionately experiencing homelessness, as well as youth who don't finish high school or earn an equivalent degree, those who are parents, and those who are system-involved.[1]

The COVID-19 pandemic has further exacerbated America's housing crisis and dramatically expanded the existing homeless population. The most recent Census Household Pulse Survey estimates that more than 210,000 young adults ages 18-24 are very or somewhat likely to lose their housing due to eviction and that more than 810,000 18 to 24 year olds have no confidence or slight confidence that they can pay next month's rent.

Young people are on the cusp of adulthood: their lives are inherently transitional. Moreover, science indicates that their brains are still developing and do not reach maturation until around the age of 25. Their lives and pathways to homelessness are often marked by histories of abuse, trafficking, discrimination, poverty, and violence as well as family homelessness and parental incarceration, mental illness, and substance use disorders. These experiences should not define the trajectory of a person's life and are absolutely no indication of a young person's aptitude, abilities, or worthiness.

Now more than ever, our young people need our attention. The coronavirus outbreak has created even more barriers to their survival, yet they have been largely left out of our national response. The majority of policies and programs were not written with the unique developmental stage and needs of youth and young adults in mind. They were written for adults or children and without understanding the significant legal, financial, and developmental challenges that youth face on a daily basis.

A significant, sustained, and comprehensive focus on our nation's young people is urgently needed. Every young person in America should have the right to a safe place to call home and multiple opportunities to succeed. The majority of Americans agree. In a poll conducted by Ipsos, ninety-one percent of polled Americans believe dealing with the problem of youth homeless is important, and eighty-eight percent agreed the success of young Americans has a direct impact on the success of their communities. Further questions showed that about 80 percent also agreed that federal and state

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[1] Morton, M.H., Dworsky, A., & Samuels, G.M. (2017). *Missed opportunities: Youth homelessness in America*. National estimates. Chicago, IL: Chapin Hall at the University of Chicago.

governments should be prioritizing the funding for programs that help young homeless people finish high school and find a job.

The Biden-Harris Administration has an obligation and opportunity to ensure youth and young adults experiencing homelessness are at the forefront of its efforts to end all forms of homelessness in America. Only if we remove the conditions in our society that make young people vulnerable to homelessness, and listen to those with lived experience who are the most impacted, can our nation be a leader on the world stage in solving youth homelessness. The National Network for Youth urges this Administration to be bold, and to cement a unique legacy as the Presidency that sets the world on a course to end youth and young adult homelessness once and for all. These recommendations seek to lay out a roadmap for USICH of how to achieve this through practical and strategic steps.

About The National Network For Youth (NN4Y)
The National Network for Youth is the nation's leading network of youth and young adult homelessness providers. NN4Y envisions a world where every young person has a safe place to call home with multiple opportunities to achieve their fullest potential. Together with our partners, NN4Y transforms systems through centering youth, policy advocacy, training and technical assistance, and public education. To learn more, visit www.nn4youth.org and contact Darla Bardine, Executive Director, darla.bardine@nn4youth.org.

These recommendations were developed in partnership with our National Youth Advisory Council and member network of community-based youth service providers, McKinney-Vento Homeless Liaisons, federal agency staff, child welfare, and legal system administrators.

1) What should the federal government's top priorities be?

Establish housing as a human right for all, including young people.
All persons should have a right to access safe and affordable housing. Housing is a human right critical to a person's health, dignity, safety, inclusion, and contribution to their community. Without appropriate housing, it is hard to get or keep a job, access health care, have proper sanitation, and feel safe. Many international legal instruments protect the right to adequate housing, including:
- *Universal Declaration of Human Rights* (Article 25);
- *International Covenant on Economic, Social and Cultural Rights* (Article 11);
- *Convention on the Rights of the Child* (Article 27);
- *Convention on the Elimination of All Forms of Racial Discrimination* (Article 5); and
- *Convention on the Elimination of All Forms of Discrimination Against Women* (Article 14).

Housing as a human right is critical. But we ask this administration to go a step further, and codify within the human right to housing, the following characteristics of adequate housing as defined by the Committee on Economic, Social and Cultural Rights:

- housing which is habitable (for example, wind and watertight);
- housing which is accessible (for example, that meets the needs of its occupants);
- housing in which the occupant has legal protection to remain, that is affordable, and that is close enough to a school, healthcare facilities, and employment.

Bold and significant funding in what is needed to prevent and accelerate progress in ending youth homelessness.

Substantial and strong investments in preventing and responding to homelessness experienced by youth and young adults is the only path forward. Youth experiencing homelessness have unique needs. Rather than addressing youth homelessness as a sub-bullet in our national response with a primary focus on housing, we propose a holistic and whole-person approach. USICH's new strategic plan should endorse a comprehensive approach to preventing and ending youth and young adult homelessness. This approach empowers our states and community partners to improve their response and help ensure that our youth and young adults thrive and meet their full potential. Specifically, robust funding is needed for:

- Youth-specific housing options with supportive services, including short and long-term housing options for both minors and young adults, inclusive of transitional housing, host homes, scattered site apartments, rapid rehousing, supportive housing, and affordable housing.
- Youth Action Boards across multiple federal programs, including Runaway and Homeless Youth Act and HUD Homelessness Assistance.
- Behavioral health care, including mental health and substance abuse treatment.
- Primary prevention, including wellness and innovative supports, connecting youth to social support groups, outlets for creative connection, and peer to peer connection.
- Affordable housing for young adults- ensuring landlords are willing to work with young adults and that youth can access affordable housing and attend school full time (currently prohibited in LIHTC funded housing).
- Youth-specific employment opportunities, inclusive of apprenticeships, targeted to youth of color, youth experiencing homelessness, systems-involved youth, youth with disabilities, and immigrant youth.
- Education supports, inclusive of a more robust McKinney-Vento Education for Homeless Children and Youth program with flexible uses of funds to more rapidly meet the needs of children, youth, and families.

Aligning the definition and eligibility criteria of homeless across federal programs to make it easier for youth to access the housing and resources they need.

The new Federal Strategic Plan to Prevent and End Homelesnsess must address the very real issue of disparate definitions and eligibility criteria of programs serving youth and families experiencing homelessness. The U.S. Department of Housing and Urban Development's (HUD) homelessness policies are the most restrictive and exclusive, most prominently impacting our children, youth and families. Aligning definitions across federal agencies will help break down the silos that currently exist across agencies and programs which make it difficult for systems and agencies to collaborate, share data, and align outcomes for our young people.

USICH's strategic plan should include that federal programs remove barriers to access for youth. With a shortage of housing options for youth and an influx of COVID relief funds, HUD has the opportunity to accelerate progress across the country in ending youth homelessness. Below are the top three actions HUD can take to increase access to their programs- critical to ending youth homelessness.

(1) HUD Should Provide a Standard Guidance to CoCs for Youth Self-Certification
Currently, there is no standard guidance for CoCs and providers to document youth's self-certification of homelessness. This is especially critical given this report language included in THUD appropriations bills:

> *"Provided further, That youth aged 24 and under seeking assistance under this heading shall not be required to provide third party documentation to establish their eligibility under 42 U.S.C. 11302(a) or (b) to receive services:"*

Further, there is no standard guidance for CoCs and providers about how best to determine what category of homelessness a young person experiencing homelessness meets. This is especially important considering the following report language included in THUD appropriations bills:

> *"Provided further, That unaccompanied youth aged 24 and under or families headed by youth aged 24 and under who are living in unsafe situations may be served by youth-serving providers funded under this heading:"*

Unfortunately, HUD is still publishing guidance requiring third-party verification for young adults as well as guidance regarding the different categories of homelessness and the corresponding record-keeping requirements. HUD should issue guidance so that CoCs correctly implement self-verification and category determination. We ask HUD to provide updated guidance immediately, and to also provide a sample self verification form for CoCs and providers to use. In our experience, CoCs can be slow to update their policies and change how they operate. A sample form is an effective way to ensure policies are updated and implemented as swiftly as possible. Most communities have developed their own forms, spending much time to do so, and all of the forms we have read still require third party documentation with no exception for young people.

(2) HUD Should Stop Limiting the Type of HUD Program a Young Person Can Access Based on Their Category of Homelessness
Current practice limits the type of program a person is eligible to access based on where they happen to find a place to sleep. For example, HUD continues to issue guidance that limits most youth and families who are staying with others temporarily to emergency shelter or "prevention" services, and prevents them from accessing rapid rehousing, transitional housing, or permanent supportive housing. (currently, Category 2 homeless person can only access HUD-funded emergency shelter or prevention services, not HUD-funded transitional housing or rapid rehousing).[2] This is especially concerning considering that Congress-passed and President-signed spending laws have report language included in THUD included the following report language:

> *"Provided further, That persons eligible under section 103(a)(5) [Category 2, imminent risk of homelessness] of the McKinney-Vento Homeless Assistance Act may be served by any*

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[2] This policy has an even more significant impact because over the past 10 years HUD has been defunding transitional housing through the NOFA. The impact of these actions is that HUD forces all CoCs to restrict access and set priorities, regardless of local needs. As a result, many youth experiencing homelessness are eligible only for programs that have been significantly defunded, despite the fact that some of these families and youth desperately need the support provided by RRH and PSH.

project funded under this heading to provide both transitional housing and rapid re-housing:"

To correct current incorrect guidance and practice of CoCs we recommend HUD push out corrective guidance immediately. This guidance should clearly state there is no limit on what housing model or service a category 2 homeless person is eligible to access.

(3) Improve Coordinated Entry For Youth And Young Adults Experiencing Homelessness Under Any Definition
The recent GAO-21-540 report, *Youth Homelessness: HUD and HHS Could Enhance Coordination to Better Support Communities,* found:

> *"Under the Continuum of Care program, communities must establish a process, known as coordinated entry, for prioritizing who receives limited housing resources. Many providers of homelessness services reported that their community's process tends to prioritize young adults lower than older adults. This is partly because these processes, following HUD guidance, give higher priority to those who have been homeless longer and who have documented disabilities. HUD has provided some information to communities on serving youth through coordinated entry, but this information largely has not addressed how to ensure that young adults are not consistently prioritized below other groups for housing."*

HUD should require every coordinated entry (CE) system to serve youth and young adults seeking any services, ensuring they are treated fairly, equally, and in a timely manner (preferably within 30 days). Specifically, HUD should:
- Ensure that all CE intake workers, at any potential point of entry used by youth and young adults, are fully informed of and educated about local prevention and early intervention programs, youth-appropriate housing options, and individual program eligibility requirements, regardless of the funding stream. CE intake workers should then make appropriate referrals to programs and services that each YYA is eligible for. For example, for couch-surfing homeless youth who are not eligible for HUD-funded housing, ensure they are referred to an RHYA funded program that can serve them.
- Through the NOFA, HUD should encourage the development, creation, and implementation of separate youth specific assessment and prioritization tools. Youth assessments for the purpose of prioritization should be comparing youth assessment scores with other youth, and not adults. In instances where youth are scored low despite their vulnerability, HUD should ensure CE systems allow for exceptions by taking into account the expertise, relational knowledge, and experiences of youth service providers who provide case management and programmatic services in the community.
- Through the NOFA, HUD should begin making CE a funded mandate so that under-resourced communities and service providers are not bearing the additional constraints and costs, which compound outputs with minimal to no allocated resources and funding mechanisms.
- Through the NOFA, HUD should prioritize the use of CoCs funds towards the implementation of Navigation Tools to provide an opportunity for waitlisted youth and young adults to stay connected with outreach workers upon the availability of housing units and/or beds.

Vouchers for youth experiencing any form of homelessness, regardless of prior system involvement.

Building on the success and learnings of the Foster Youth Initiative (FYI) and Family Unification Program (FUP), the U.S. Department of Housing and Urban Development should develop and launch an "on-demand" housing voucher program targeted to all young adults in need of housing assistance. No young adult should languish in homelessness. Instead, HUD should leverage the considerable housing resources it has to proactively provide more vouchers that include supportive service funding and is tied directly to local providers on the ground with experience and expertise in serving youth experiencing homelessness. This should include:

- Immediate on-demand vouchers that include supportive services and are flexible, portable, and specifically targeted to young people experiencing any form of homelessness
- Place-based vouchers targeted specifically to serve young adults under the age of 30.

(1) On-Demand Portable Vouchers Targeted to Young People

Many young people experiencing homelessness have never encountered the child welfare system, are not experiencing homelessness due to a formal eviction, and would benefit greatly from having a multi-year portable voucher. Stable housing enables young adults and young families to access the stability they need to achieve their education and employment goals. Further, Chapin Hall has found that homelessness for young people and families is a fluid experience, with many young people bouncing from shelter to couch to street to couch. That is why this program needs to use the definition of homelessness developed to target youth and families. In addition, young people are developing and pursuing their education, employment, and other personal dreams that often require young people to move. These pursuits may require moving to enable young people to achieve upward economic mobility. For these reasons, it is critical that vouchers for youth be portable. Further, many landlords are reluctant to lease to young people, especially those as young as 18, 19, and 20, and many youths experiencing homelessness are unplugged from the vital connections and systems of support that other young people have access to. As a result, there is a need for a community-based expert youth agency to have resources in order to help young people locate landlords willing to rent to them as well as someone to help them access any other support services all young people need to lead healthy lives and thrive as adults. For all the reasons stated above, key features of this new voucher program for youth must include:

- Access to all youth in need of stable housing, using eligibility criteria in line with the U.S. Department of Education and U.S. Department of Health and Human Services
- Ensure vouchers are for at least 5 years in length and portable to any new address within the United States
- Allow voucher holders to have roommates and live in shared housing
- Provide supportive services to voucher recipients via HUD CoC supportive service only (SSO) grants- requiring every CoC to provide at least one SSO grant to provide support to youth with vouchers in their community
- Vouchers should not be competitive, but drawn down as needed
- Key partners in distributing vouchers for youth should be youth serving agencies and systems, including Runaway and Homeless Youth Act grantees, youth employment, child welfare, and court agencies

(2) *Place-Based Vouchers Targeted to Serving Young Adults Enter Before the Age of 25 and Can Stay up Until the Age of 30*
Young adults experiencing homelessness need access to affordable housing and often struggle to find landlords willing to rent to them. Many landlords are reluctant to lease to young people, especially those as young as 18, 19, and 20 due to a lack of employment or underemployment, and due to a lack of rental history or credit history. Also, in addition to the support and resources that all young people need to thrive, many youth experiencing homelessness need access to support services designed to heal the unique traumas they have experienced, so they have the opportunity to succeed, regardless of their start in life. As a result, there is a need for youth-specific project-based vouchers (PBVs) to ensure access to safe and stable housing for youth who struggle with finding a landlord willing to rent to them. In order to enable providers to dramatically increase their capacity to house young people experiencing homelessness, PBVs need to be targeted specifically to young people. Specifically, a minimum15% set-aside of PBVs for low-income young adults aged 18 to 25 via the Housing Choice Voucher (HCV) program. Further, we are asking that PHAs select at least one youth specific project in their community for a PBV.

2) What are the biggest barriers in your community?

Different funding streams coming to communities have different definitions of homelessness, eligibility criteria, and priorities.
There is not currently one federal definition of homelessness. The U.S. Department of Housing and Urban Development implements a definition of homelessness through regulation, guidance and NOFOs that is the most narrow and primarily excludes children, youth, and families. This needs to change so that all young people in need are able to access what they need as soon as they need it. An aligned definition across federal agencies would go a long way in breaking down the silos that currently exist, making it much easier for systems and agencies to collaborate and share data and align outcomes for our young people.

HUD policies, law, regulation, and NOFO are not written for youth, but for adults.
The issues with HUD's narrow definition and other adult-centric policies being applied to youth were highlighted above in our third recommendation of the first question. In addition, we have outcome measure recommendations and housing model recommendations.

(1) *Make Outcome Measures Work for Youth*
Currently, HUD's outcome measures are the same across all HUD HAG-funded programs, no matter the population they serve. These measures are not in line with the four core outcomes for youth developed by the U.S. Interagency Council on Homelessness (USICH) and have been widely accepted. To ensure that youth programs measure outcomes appropriate to youth and are widely accepted, HUD, through the NOFA, should replace the current measures for youth-serving programs with measures that fall within the four USICH pillars of (1) social and emotional well-being; (2) permanent connections; (3) increased education or employment; and (4) stable housing.

Specific to [HUD's system performance measures:](#)

- [Measure 4:](#) Employment and Income Growth for Homeless Persons in CoC Program–funded Projects --More things should be considered a positive outcome for families and youth age 24 and under, to include:
    - Showing any employment
    - Being enrolled in a job training program
    - Being enrolled in a subsidized job training program
    - Being enrolled in an educational program (defined broadly)
- Amend the Rapid Rehousing (RRH) measure of housing people within 30 days to 60 days for families and youth 24 and under.

NN4Y recommends that all programs serving youth and young adults experiencing homelessness develop shared outcome measures across the following categories:
- Stable Housing
- Education, Training & Employment
- Life Skills
- Health & Social/Emotional Well-Being
- Permanent Connections

(2) *Elevate Transitional Housing as an Effective Model to End Youth Homelessness*
Transitional housing for youth offers young people a stable place to live for a significant period of time and also provides case management and other supportive services (e.g., behavioral health services, educational and career development assistance). For minors or young adults—including those who are pregnant and parenting—this can be an ideal approach that serves as a bridge from homelessness to lifelong stability.

Youth who access transitional housing, particularly for longer periods, experience positive outcomes related to housing, employment, education, and access to services. An analysis by Covenant House International found that among 564 young people who exited transitional housing programs in 15 U.S. cities over a 12-month period:
- 73% exited the program into stable housing; and
- 69% were employed or enrolled in school when they left the program.

CHI's research team also found that youth who stayed in the program longer were more likely to exit to stable housing and to be employed when they exited the program. They also found that youth who identify as Black, Indigenous, or People of Color ("BIPOC youth") had higher rates of stable housing exits and higher rates of employment at exit (but lower rates of school enrollment). This is an important finding for achieving equity, given that BIPOC youth are disproportionately likely to experience homelessness.

Data from other programs also have demonstrated positive outcomes for young people accessing transitional housing, including for minors and for youth in rural communities.

To truly increase access to this effective housing model for minors and young adults, we recommend that USICH elevate it as an effective model and we recommend that every community offer service-rich transitional housing program options (in some form) for minors, young adults, and young families experiencing homelessness.

Youth experiencing homelessness need more than housing, they need case management and access to education, employment programs, mental health, and other services.
Young people are on the cusp of adulthood--their lives are inherently transitional. Moreover, science indicates that their brains are still developing and do not reach maturation until around 25. A youth strategy requires a cross-system approach, not just a housing only focus. What is needed is a holistic and whole-person approach. Like any young person, youth experiencing homelessness need more than just housing to successfully transition to adulthood. For these reasons, the solution for homelessness experienced by youth is not housing only, it also includes an array of supportive services and connections to education and living wage employment opportunities.

There are few housing and service options for minors experiencing homelessness unaccompanied by a parent or caregiver. Minors experience many barriers in accessing the help they need because they have few legal rights. The child welfare system lacks the resources and mandate to meet the demand.
As the recent [GAO-21-540 Youth Homelessness: HUD and HHS Could Enhance Coordination to Better Support Communities](#) report found,

> *"Minors experiencing homelessness unaccompanied (without a parent or caregiver) do not participate in the coordinated entry process, with several noting there are limited housing options that can serve minors. Some providers and other stakeholders discussed challenges coordinating between the homelessness and child welfare systems to serve this group. However, HUD and HHS have provided limited information about or examples of how providers could coordinate to better serve unaccompanied minors."*

Minors experiencing homeless are treated as hot potatoes being tossed between homelessness, juvenile legal, and child welfare systems. Instead, these young people need housing options with supportive services and connections to caring adults. A summary of challenges that minors face when trying to access services include:

Access to services without parental consent: In most states, the default assumption is that providers must have parental permission to allow minors to access shelter and other homelessness services (although there may be exceptions/alternate processes for stays of less than 24-48 hours, or if a parent cannot be located). Additionally, states have differing laws on when and under what circumstances minors may access health care without parental permission, but in many places, unaccompanied minors (especially at younger ages) face challenges to accessing needed care. Barriers to accessing public benefits and identification documents can also prevent youth from exiting homelessness.

Lack of appropriate housing options and interventions: Many types of housing or housing interventions are not well-suited to or legally available to minors. For example, offering housing vouchers or subsidies, or using approaches like rapid rehousing may not be helpful to minors, who generally cannot sign leases, and may need to focus on their education rather than working full-time to afford rent. Minors need opportunities to live with families (when that is their preference) and to learn the skills they need to live independently as adults. Host homes have been identified as a good potential solution for serving youth experiencing homelessness in a family environment, but many programs find it difficult or impossible to serve minors due to legal, liability, or licensing restrictions.

Child welfare system issues: Family conflict is perhaps the most significant driver of youth homelessness, which means that potential or past child welfare involvement is often an issue for minors experiencing homelessness. This can look different in different jurisdictions, depending on local child welfare policies and practices. Child welfare systems are sometimes seen as the default or appropriate place for minors who are facing family conflict or homelessness, but these agencies may not actually be serving most youth who do not have housing for a number of reasons:

- Young people may avoid child welfare involvement, even if that means becoming homeless, because of past negative experiences they or their peers have had with that system.
- Young people's experiences leading to homelessness may not meet legal definitions of abuse or neglect.
- Service systems may simply be too over-taxed to serve all youth in need or to respond promptly to abuse or neglect allegations.

Providers also noted that a parent may not consent to medical or mental health treatment for their child if they fear child abuse or neglect charges based on the injury or issues raised.

Bias, discrimination, and lack of equity: Young people of color and LGBTQ youth are disproportionately likely to experience homelessness. Although individuals of any age experiencing homelessness may face bias and discrimination based on their race, ethnicity, national origin or immigration status, sexual orientation, or gender identity/expression, minors' legal status may compound these issues. For example, a young person who was kicked out of their parents' home because they are LGBTQ could be barred from accessing shelter or medical care because those same parents refuse to consent to it. If Native American youth are ejected from shelters more frequently (as at least one community found to be the case), those who are minors may be at even greater subsequent risk for the challenges outlined above. Bias and discrimination that can lead to youth of color experiencing homelessness start well before a young person ever encounters a potential landlord or employer, as youth of color experience school suspensions and expulsions at much higher rates (beginning as early as preschool) and experience justice system involvement, including incarceration, at dramatically higher rates than their white peers. Families of color also disproportionately experience child welfare system involvement, meaning that the harms of two of the primary "feeder systems" for youth homelessness are falling disproportionately on youth of color.

Legal representation challenges: Some legal services organizations cannot represent minors due to funding restrictions, or parental consent requirements. Attorneys who are able to represent minors also report challenges with forming an attorney-client relationship due to the minor's inability to contract for services.

Lack of resources: Lack of adequate funding and other resources is a challenge for all homelessness service provisions, but the fact that homelessness among minors is so "hidden" can make it impossible to describe the scope of the problem and advocate for needed funding. Public and private funders may also believe that the child welfare system is already serving all or almost all minors experiencing homelessness apart from their families, which is simply not the case.

Our Recommendation: Center Youth

A key strategy to effectively end youth homelessness means partnering with and centering youth. Particular to the issues faced by minors, we further emphasize the need to center youth throughout the change process to go from excluding to including minors in improving community, state, and national policies. Youth should be at your table from the beginning. Input from young people with relevant experience should guide what you are advocating for, and young people should be partners in your advocacy efforts.

Youth should be involved in a range of ways, including:
- Educating advocates, policymakers, and others to help them understand the barriers that lead to minor-aged youth to experience homelessness as well as the barriers that make it difficult to access the help needed to exit homelessness.
- Identifying possible solutions.
- Advocate for solutions to end homelessness among minors through advocacy meetings with legislators or testifying in public hearings to help policymakers truly understand why action is vital for young people experiencing homelessness and their larger communities.

There is a lack of access to comprehensive health care and behavioral health care, including medical, dental, vision, mental health, and substance use care for youth experiencing homelessness.

It is very difficult for youth experiencing homelessness to access health insurance and it is difficult for them to access preventative health care as well as treatment. Youth under 18 must apply for ACA coverage in-person and prove tax independence, which is difficult for unaccompanied youth experiencing homelessness. In addition, young adults over the age of 18 face many barriers when trying to enroll in their state Health Insurance Marketplace. Youth experiencing homelessness with chronic mental and physical health conditions are denied access to medical and mental health treatment and prescription drugs necessary to address or stabilize their diagnosis. Untreated acute conditions can worsen, turning into medical emergencies. Youth with untreated mental health problems may also end up in the criminal justice system. Lack of health care can exacerbate homelessness and interfere with homeless youth's ability to attend school, obtain or keep a job successfully. This is a particular problem for youth with chronic mental or physical health issues that require ongoing medical supervision or medication management. The EO should require HHS to promulgate rules that allow certification of homelessness as evidence of tax independence for purposes of accessing health care through the ACA. In addition, the rules should also create an exception, for homeless minors, to the requirement that only adults can apply online.

Child welfare and legal systems are large drivers of homelessness for youth.

The intersection between youth homelessness, child welfare and legal systems is well documented. Youth experiencing homeless become involved in policing and incarceration systems at much higher rates than their housed peers. Involvement in these systems is harmful and does little to resolve their true needs: safety, stability, healing, connections to caring adults, and connections to lifesaving services.

Of the 4.2 million youth and young adults who experience homelessness every year, approximately 1 million become involved with the youth court, probation, and incarceration systems. In some cases, this involvement may be due to a lack of shelter or other necessities. This can sometimes occur when a

young person is arrested for a curfew violation due to lack of stable housing, or when they are arrested for theft for stealing food, or money to buy food. In other cases, youth who are arrested and released (either through a diversion program or after spending time in a juvenile detention facility) may experience homelessness because they are either unable to return to their families due to restrictions imposed by landlords or public housing authorities, or because families are unwilling or unable to have young people return due to family conflict.

Research has found that 25 to 33 percent of youth and young adults experiencing homelessness had a history of foster care. Young people's entry into foster care was often part of a larger pattern of family instability and was perceived by some young people as the beginning of their experience with homelessness. Also, there are multiple pathways to homelessness from the foster care system, including aging out of foster care into homelessness as well as adoption or kinship placements that fail (do not end up being a permanent placement) and result in young people experiencing homelessness on their own.

Every young person exiting the child welfare system should have access to a flexible housing voucher, case management, and other services as needed to ensure they are able to avoid homelessness. Second, the Families First and Prevention Services Act (FFPSA) provides opportunities to improve collaboration to significantly reduce YYA homelessness:

(1) Prevention Services
- By defining youth experiencing homelessness and the risk of homelessness as "candidates" for foster care in their state plans, states might be able to use prevention funding.
- Prevention services can also potentially address some of the root causes of youth homelessness, such as substance use and mental health issues.
- RHY providers are uniquely positioned to provide FFPSA prevention services to developing adolescents and child welfare agencies should be encouraged to contract with RHYA providers.

(2) Congregate Care Reduction
Not all adolescents want to be placed in a foster family, and RHY and child welfare agencies can work together to ensure a full continuum of Supervised Independent Living Programs are available.

(3) Chafee Program Eligibility Extension
Continued support for young people up to age 23 after they leave foster care could mean more time to secure stable housing and access to the support needed for a successful transition to adulthood.

Inadequate supply of transitional housing, vouchers, and supportive services for minors and young adults experiencing homelessness.
In general, there has been a severe lack of resources allocated to preventing and ending homelessness across all populations. This lack of investment has been keenly true for youth and young adults. Annually, funding directed specifically to youth experiencing homelessness via HUD programs and the HHS Runaway and Homeless Youth Act programs has not exceeded $300 million per year, which is only $71 per year per young person experiencing homelessness.

The cost of not investing in the lives of youth experiencing homelessness is an economic burden that affects the young person, taxpayers, and society. Researchers have found that taxpayers face an estimated lump sum 2011 fiscal cost per youth of $248,182 and social cost of $613,182.[3] Taking the modest taxpayer[4] cost of $248,182 per youth and applying it to *only half* of the 4.2 million youth who experience homelessness every year in America, the taxpayer cost is over $521 billion (2.1 million x $248,182). Through increased investments, all youth experiencing homelessness will be able to connect with the supports, services, and systems they need to exit homelessness. These reconnected youth in turn become part of the solution to homelessness and contribute to the community's wellbeing.

Significantly increasing funding directly to preventing and ending youth and young adult homelessness would change the life trajectories of many young people, save money, and result in healthier and safer communities. When all youth have the opportunity to succeed, they reach higher for their own wellbeing, avoid intergenerational poverty, and build stronger communities.

3) How can the federal government more effectively center racial equity and support equitable access and outcomes at the local level?

Federal programs should prioritize having directly impacted individuals evaluate programs and participate in grant reviews to make funding decisions.
Many of our community and national efforts to end youth homelessness have deliberately included youth with lived experience. There is still much work to be done that truly shares power with youth with lived experience, including decision-making. The federal government should ensure that youth with lived experience participate in reviewing grant applications and are a key part of determining which organizations receive funding. This practice would combat the current disconnect between entities that have the capacity (resources) to write a good grant application and those who are doing the good work that is needed.

Require data analysis by race/ethnicity to determine if BIPOC youth had equitable access and equitable outcomes when compared to white youth. This same analysis should be applied to LGBTQ+ youth.
A critical first step is to require all federal programs serving youth and young adults to collect racial and LGBTQ+ identity data as well as housing status (particularly those that provide vital health, subsistence, housing, and employment services like CMS, ACF, FDA, HUD, and DOL). Only then, can equity analysis be carried out. For example, tracking access to programs, exits to safe and stable housing, being kicked out of programs, and etc. This data and analysis would allow for a better understanding of how and why many youth and young adults experiencing homelessness interact with mainstream service systems and to highlight disparities in access to needed assistance. This would also inform systems about the extent to which homelessness is a literal barrier to youth services

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[3] Foldes, Steven S. and Lubov, Andrea. (2015) *The Economic Burden of Youth Experiencing Homelessness and the Financial Case for Investing in Interventions to Change Peoples' Lives: An Estimate of the Short-and Long-Term Costs to Taxpayers and Society in Hennepin County, Minnesota.* https://www.youthlinkmn.org/wp-content/uploads/2016/04/the-economic-burden-of-homeless-youth-in-hennepin-county.pdf; **Social cost** is defined as the total costs to society including lost earnings, lost tax payments, public crime expenditures, victim costs, welfare support programs, education, excess tax burden and public housing support.
[4] Belfield, et. al., The Economic Value of Opportunity Youth. January 2012

(i.e., when lack of address, parental permission, or stable housing is a reason for program turn-away or rejection).

Provide funding directly to organizations led by those who are BIPOC.
For too long, the majority of organizations and systems serving youth experiencing homelessness have been led by white people. This is in sharp contrast to the persons being served by these programs, who are disproportionately BIPOC. We know that nonprofit organizations have been perpetuating systemic and historical racism and perpetuating dominant white culture. We also know that organizations led by people of color receive less grant money, with more strings attached, than white-led organizations. The federal government can make a significant impact in shifting significant resources to organizations led by those who are BIPOC. We recommend this change in funding priority across all federal grant programs.

Funding for organizations and systems change around racial equity.
Reports have shown that youth experiencing homelessness often face discrimination in the form of racial or ethnic identity, gender identity, and the situation of homelessness itself. For example, a study on 12--20 year old youth and young adults experiencing homelessness in Los Angeles County found that lesbian, gay, and bisexual youth reported more discrimination than heterosexual youth experiencing homelessness, including discrimination from peers, family, and the police. Further, a study of youth experiencing homelessness (14–23 years old) in New York City found they reported experiencing discrimination associated with their age, sexual orientation, gender identity, educational achievement, homelessness, and race/ethnicity.

Every young person, no matter their race, ethnicity, sexual orientation, gender identity, or creed, should have access to culturally appropriate and youth--centric housing and services that they need when they need it. Systems created for children and adults (e.g. child welfare, HUD, etc.) exclude the social-- emotional learning approaches and trauma--informed practices that youth need, which perpetuates systems of power, privilege, and exclusion for this vulnerable community. Instead of exclusion and contempt, young people need immediate access to housing options and service options. In addition to increasing funding given directly to organizations led by those who are BIPOC, investments need to be made to help current systems and social service providers center equity in their organizations by deliberating undertaking a change process to reject white supremacy culture and cease perpetuating systemic racism.

Federal funding to programs should increase per person served with a required increase in pay equity.
Too often frontline low-income workers in homelessness services are workers of color. These critical workers are not earning a living wage. In sharp contrast, those nonprofit workers in positions of leadership who are earning a higher salary are white people. Just one of the many ways nonprofits are perpetuating white supremacy culture. In conversations we have facilitated with many social service agencies, there is a strong desire to pay a higher wage to frontline staff, but the majority of funding does not cover the true costs of serving those experiencing homelessness and allows organizations to pay a higher wage to frontline staff. The federal government can help to address this by providing more funding per grant award and requiring that all grantees provide a living wage to all employees.

Remove arrest, warrant, and conviction restrictions to housing, which disproportionately impacts BIPOC.

One in three people in the United States has a criminal record, meaning they are subjected to more than 44,000 associated legal sanctions. A criminal conviction can be a lifelong barrier to accessing services, employment, voting, civic engagement, education and housing, as well as overall financial security for individuals and their families. The criminal legal system disproportionately affects communities of color, and Black people in particular, through more stops by police, arrests, and convictions, as well as higher rates of incarceration and longer sentences.

Housing related barriers take a number of forms, including background checks as part of rental and public housing applications, denial of constitutional fair housing law protections. Eviction and housing forfeiture, and denial of rental or sale. These barriers affect a range of housing types, including rental housing, student campus housing, federal and public housing, temporary housing at motels and hotels, and some congregate shelter housing. These same issues can split families up, not allowing family members with a legal system record to not be able to live in the same unit.

Though alleviating the issue of housing insecurity for all should be approached with preventive methods, record-clearing is essential for community members who have been criminalized and carry their convictions with them.

Stop the school to prison pipeline, which disproportionately impacts youth of color.[5]

The school to prison pipeline is the arrest of students in schools, disproportionately youth of color, LGBTQ+ youth, and youth with disabilities. Arrests of students in schools result in youth entering the criminal justice system, which often has life changing negative effects. We know that students who do not complete high school are much more likely to earn a lower wage and experience homelessness as a young person when compared to peers that graduate or an equivalency degree.

Therefore, decreasing the school to prison pipeline is indeed a key homelessness prevention strategy. Instead of zero tolerance policies, schools should instead use more positive-based strategies for addressing and modifying defiant behaviors. For example, On-Campus Intervention Program (OCIP) and Consistency Management and Cooperative Discipline (CMCD) programs are two alternative approaches to suspension and expulsion that have the ability to create a shift from a punitive learning environment to one that is warm and welcoming for all students.

Further, schools need to provide behavioral and mental health services in school for the students who need it. Schools are not just a place of learning, but should provide holistic support and services to the students who need it the most.

Decrease the number of youth experiencing homelessness who encounter police before they encounter a social services provider.

Many challenges facing communities do not require the involvement of police, as armed intervention may only exacerbate deeply rooted inequities and trigger underlying traumas. Collaboration should require the safety of youth and considering how to reduce contact with law enforcement. Community

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[5] See: *A better path forward for criminal justice: Reconsidering police in schools.* https://www.brookings.edu/research/a-better-path-forward-for-criminal-justice-reconsidering-police-in-schools; Goldstein, Dana "Do police officers make schools safer or more dangerous?" The New York Times, June 12, 2020. https://www.nytimes.com/2020/06/12/us/schools-police-resource-officers.html

partners such as runaway and homeless youth providers, educational institutions, child welfare agencies, behavioral health/mental health providers, and local police departments should work together and identify how each can continue to collaborate to support each other's work in response to homelessness.

Some examples of police and community-based provider partnerships:
Project Oz in Bloomington, IL strives to maintain a collaborative relationship with law enforcement throughout all of their programs so that young people are referred for services instead of criminalized. Local officers trust Project Oz to provide effective, professional services to youth in need, allowing the officers to return to their own job duties more quickly. Some examples of Project Oz's partnerships with police, courts, and detention systems are:

- Project Oz is the Comprehensive Community Based Youth Services (CCBYS)[6] provider for their county. In the State of Illinois, every county is covered by a CCBYS provider, as outlined in the Illinois Juvenile Court Act. The core population for CCBYS services are young people ages 11-17 who are not current DCFS wards and who are either absent from home without parental consent, beyond the control of his or her parent, or whose parent or caregiver has denied the child access to the home and has refused or failed to make provisions for another living arrangement for the child. Further, the Illinois Juvenile Court Act of 1987 was amended to include the following language: *A minor under 13 years of age shall not be admitted, kept, or detained in a detention facility unless a local youth service provider, including a provider through the Comprehensive Community Based Youth Services network, has been contacted and has not been able to accept the minor.*

  As a result, many of Project Oz's calls for service come from local law enforcement agencies, who are often the first point of contact when conflict erupts in a family or who may encounter runaway and homeless youth during the course of their duties. Each year Project Oz staff speak to every shift in every local law enforcement department during their "roll calls" in order to remind officers to call when they contact a runaway or homeless youth so that services can begin immediately and further involvement with juvenile justice can be avoided. In addition, every "Missing Person Alert" issued for a youth by the Bloomington Police Department includes Project Oz's contact information. (This raises community awareness of Project Oz and provides an alternative point of contact for youth or community members who do not feel comfortable contacting the police directly about youth who have run away.)

  Project Oz staff are on-call 24/7 to respond to crisis calls. When they receive a call for assistance, CCBYS standards mandate that they have 15 minutes to respond to a request for services by phone and an additional 60 minutes to respond in person (90 minutes in rural locations). They then work to stabilize the youth and mediate the situation between the youth and caregiver. Project Oz's first priority is to ensure the youth's safety and return the youth home when possible and safe. If the youth's home is not a safe and viable option, staff works with the youth and family to identify a mutually agreeable short-term alternative. This may include staying with a relative or friend or placement in the organization's own network of

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[6] "CCBYS is authorized by the Children and Family Services Act (20 ILCS 505/17 and 17a), and implements Article 3 of the Illinois Juvenile Court Act of 1987 (705 ILCS 405/3 et seq.). This statewide 24/7 crisis intervention system is mandated to serve youth in crisis (runaways, lock-outs, beyond control and in physical danger) and also serves youth in high-risk situations, and their families when appropriate, according to their needs and in keeping with the goal of family preservation, reunification and/or family stabilization, or independence, dependent upon the youth's needs. A continuum of services is available statewide and provided to youth at risk of involvement in the Child Welfare and Juvenile Justice Systems."

DCFS-licensed Host Homes. This allows time to continue to work with the young person and family to address conflicts, strengthen communication, and determine the best long-term, stable living option for the young person. Of course, they immediately report any alleged child abuse or neglect to DCFS, in accordance with their status as mandated reporters.

- Project Oz is also in regular contact with law enforcement receiving referrals for services of older youth experiencing homelessness.
- Project Oz also runs the Youth Empowered Schools program with embedded counselors in several local high schools and these counselors work closely with the School Resource Officers in each school to identify students who are struggling with peer relationships, family or school conflicts, truancy, and otherwise need extra support to stay on track and graduate.
- Project Oz is also a founding member of the McLean County Juvenile Justice Commission and works closely with McLean County Court Services/Probation to ensure eligible youth receive referrals to their program.
- Project Oz also participates in the regional U.S. Attorney's Office Central Illinois Human Trafficking Task Force alongside law enforcement agencies to improve the identification of youth victims of trafficking, ensuring they receive the services they need and the respect they deserve.

The Link in Minneapolis, MN has several examples of partnerships:
- The Link is a signatory partner of the "Joint Powers Agreement" program with the City of Minneapolis, Minneapolis Public Schools, and Hennepin County, which created The Link's Youth Supervision Center. The program is located within Minneapolis City Hall and is open 24 hours a day, 7 days a week, providing a safe alternative place for any law enforcement agency within Hennepin County (all police jurisdictions, U of M PD, transit PD, county sheriff) to drop off youth. Youth served are between the ages of 10 and 17 and may have been picked up for a low level or status offense, no offense, or felony car theft and/or have been sexually exploited. The officer drops off the youth at the Juvenile Supervision Center instead of bringing the youth into a juvenile detention facility or other criminal justice response. The Link provides assessments, helps youth back home/with their family (whenever it is safe and appropriate), or, if they are experiencing homelessness, connects them to an emergency shelter. Youth and their families are also provided with ongoing supportive services that include mobile case management, groups, assistance with basic needs, education, etc.
- The Link also has three programs for youth (Marshall Reed Youth Center, the POWER Program and the Community Navigator Program) which work in partnership with Hennepin County Juvenile Probation. These programs take referrals from Hennepin County Juvenile Probation Officers and then provide an alternative to a detention/corrections response that includes case management, structured groups, and support/assistance with the youth and families basic and ongoing needs. All of these programs are located in north Minneapolis Link locations.
- The Link also has a School Matters program in partnership with the Hennepin County Attorney's Office Be at School Program. They take referrals for youth who are truant from school and provide a program to address the underlying reasons the youth isn't attending school, while also providing supportive services, mobile case management, and groups.
- The Link also has, within its Housing and Services Division, a housing program (the Periscope Program) specifically for youth coming/aging out of child welfare, juvenile justice and/or children's mental health placements, funded through Hennepin County. The program provides scattered site housing and supportive services/case management for these young people who are referred by their county worker.

New Beginnings in Maine has had a detention alternative contract with Maine Department of Corrections (DOC) for decades. Youth who, through no fault of their own, cannot return home but who are not a threat to the community are referred to New Beginnings' emergency shelter rather than to the Long Creek Youth Development Center while other housing alternatives can be developed. Over the past year they have expanded this contract with the Department of Corrections to include reserved beds in their Transitional Living Program for youth under age 18; this gives youth 18 months of housing, case management and life skills development rather than being incarcerated. This improved contract includes funding for two new staff positions (a case manager and youth worker) specifically trained to work with youth in the juvenile system and build working relationships with Juvenile Correctional Case Officers (Maine's version of juvenile probation officers) to help youth live independently in the community with "supervision" levels that meet their specific needs.

Bill Wilson Center in San Jose, CA: The Santa Clara County Policy Department has a policy to minimize the unnecessary incarceration of youth by seeking alternatives to custodial confinement. The policy, developed in 2009, details the specific circumstances under which police officers take young people to community alternatives to incarceration. The Bill Wilson Center is one of three agencies specified as an alternative to incarceration. (Read the full policy in Appendix A.) Santa Clara County court also has a standing court order (Appendix B) that allows the Bill Wilson Center to serve probation-involved minors in the absence of parental consent.

4) What lessons have you learned during the COVID pandemic about how housing, health, and supportive services systems can help?

The COVID pandemic made clear that housing is health care given that homeless individuals were at much greater risk of contracting and spreading COVID and also suffered poorer outcomes after contracting COVID due to a lack of housing and medical care.

COVID-19 brought existing disparities into greater focus. The COVID-19 pandemic showed us that housing is healthcare, and housing and healthcare are racial justice issues. What does a stay-at-home order mean for a person with no home, no regular source for taking care of personal hygiene, and disrupted connections to their usual sources of services? As COVID spread, individuals living in shelters or other congregate sites were often as vulnerable as nursing home populations. Those with underlying medical conditions faced greater risk of severe illness if they contracted the virus. Faced with nowhere to go for recovery, individuals experiencing homelessness who had the infection put others at risk of contracting the virus by continuing to stay temporarily with others or live on the streets.

Studies from the early months of the pandemic in the United States found that infection rates and, in some places, hospitalization rates of those experiencing homelessness were substantially higher than those with stable housing. Homelessness is generally treated by health systems and patients without homes are discharged to the street if their medical needs do not require immediate hospitalization. But the COVID-19 pandemic has made homelessness unignorable and brought the issue of access to housing into the responsibility of more sectors, including health practitioners.

Communities coming together to create mutual aid efforts really cut through the red tape that comes with many government funding streams being slow to get to communities and certainly to young people.

Mutual Aid systems are where people work cooperatively to meet the needs of everyone in a community. Mutual Aid emphasizes solidarity instead of charity. Mutual Aid can have specific goals, such as preventing homelessness. During the pandemic, 1,000s of mutual aid networks were created across the nation in response to the impact of the pandemic. Mutual aid includes raising funds as well as banding together to petition for specific policy changes, temporary or permanent. One example, tenants in a building banding together to secure a temporary reduction in rent.

Importance of having accurate real-time information and not outdated directories and resource guides.

Amidst the pandemic, social service providers were changing their policies and procedures for the safety of those that they served. In many cases, this included reducing the number of beds a provider had available and limiting the number of youth able to enter a drop-in center or moving to a fully virtual and drop-off outreach program. What was critical in order to connect youth in crisis to what they needed was having real-time information of available housing and services, including knowing how to get Wi-Fi and other resources youth needed in order to connect to their virtual education.

Those lacking stable and consistent digital connection (Wi-Fi, smartphone, and laptop, etc.) had difficulty participating in schools, accessing employment, and staying connected to systems of support.

For people already experiencing and at-risk of homelessness, the digital divide was keenly felt. The lack of digital connection was immense for people at risk of or already experiencing homelessness. The lack of access to the internet, Wi-Fi, and devices was overlooked during the pandemic. Now, post-pandemic the world is even more dependent on technology and homeless youth not having the access to technology or the ability to pay for devices and Wi-Fi causes them to be adversely affected. The world has become technology dependent, this affects youth from their ability to access education to other everyday necessary activities.

Cash directly to young people empowers them and we should give them more.

During the pandemic, some youth experiencing homelessness were able to access direct cash via the Economic Stimulus Payments, and will soon be able to access cash resources via the expanded Earned Income Tax Credit for homeless and foster youth. In addition, there have been pilot programs giving direct cash assistance to youth experiencing homelessness. Some initial findings of this direct cash assistance have been to focus on: (1) Center on youth, equity, and trust; (2) boost housing stability and empowerment; (3) adopt a flexible and simple approach; and (4) identify and manage barriers to success.[7]

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[7] Morton, M. H., Chavez, R., Kull, M. A., Carreon, E. D., Bishop, J., Daferede, S., Wood, E., Cohen, L., & Barreyro, P. (2020). *Developing a direct cash transfer program for youth experiencing homelessness: Results of a mixed methods, multi stakeholder design process.* Chicago, IL: Chapin Hall at the University of Chicago. Available at: https://www.chapinhall.org/research/direct-cash-transfers-program-can-help-youth-sustainably-exit-homelessness

5) Is there anything else you wish to add?

The federal Runaway and Homeless Youth Act program should be funded at levels similar to the HUD Homeless Assistance Grant program, which is currently funded at over $3 billion per year.

With 4.2 million youth experiencing homelessness every year in the U.S., funding for the Runaway and Homeless Youth Act program must increase dramatically beyond the current funding level of just over $130 million per year. At a minimum, this program needs to be funded at $1 billion per year, as well as the need to expand this program to provide prevention services, more diverse housing options, and be able to serve older youth. These updates are critical because RHYA is the sole federal funding stream targeted specifically to provide housing options to minors and young adults experiencing homelessness, a significant gap in most communities' efforts to prevent and end homelessness.

Raise the minimum wage on a national level so more people are able to afford basic life needs such as food and housing based on the wage they are paid.

No one earning the federal or state minimum wage can afford average housing costs. Research has found that renters need to earn $24.90 per hour nationwide in order to afford a two-bedroom apartment.[8] The current federal minimum wage is $7.25 an hour and it has not been increased since 2009. There has been discussion of raising the federal minimum wage to $15 an hour by 2025, but no legislation has passed yet to raise the minimum wage. There are states and cities with higher minimum wage levels. Based on the research that has been conducted, for families needing at least a two-bedroom apartment, $15 an hour is not enough income to pay for market rent and other basic living expenses. The minimum wage should be raised across the country so that all persons are able to afford the number of bedrooms needed as well as their other living expenses. Finally, a 2019 Congressional Budget Office report projected a significant improvement in the standard of living for at least 17 million people, assuming a minimum hourly wage of $15 by 2025, including an estimated 1.3 million people being elevated above the poverty line.[9] As a result, it is expected that federal and state government expenditures on public benefit programs for low-income individuals would decrease.

Institute rental protections so that rental costs don't increase as wages increase.

Coupled with raising living wage standards across the country, there needs to be controls in place to prevent inflation, including increased housing costs. Rent control is a government program that places a limit on the amount that a landlord can demand for leasing a home or renewing a lease. Rent control laws are usually enacted by municipalities, and the details vary widely. All are intended to keep living costs affordable for lower-income residents.

Rent control is not currently widespread in the US. Oregon is the only state with statewide rent control, enacted in 2019, thirty-seven states either prohibit or preempt rent control, and eight states allow their cities to enact rental control, but cities have to implement it. Research has shown that rent regulation is effective in limiting rent increases, although how effective it is depends on the specifics of the law.[10] First, research suggests that vacancy decontrol may significantly weaken rent control. Second, there is no evidence that rent regulations reduce the overall supply of housing. They may, however, reduce the

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[8] National Low Income Housing Coalition. (2021) *Out of Reach: The High Cost of Housing.* Available at: https://nlihc.org/sites/default/files/oor/2021/Out-of-Reach_2021.pdf
[9] Congressional Budget Office. (2019). *The Effects on Employment and Family Income of Increasing the Federal Minimum Wage*. Available at: https://www.cbo.gov/system/files/2019-07/CBO-55410-MinimumWage2019.pdf
[10] https://jacobinmag.com/2019/11/rent-control-housing-crisis-affordability-supply

supply of rental housing if it is easy for landlords to convert apartments to condominiums or other non-rental uses. This suggests that limitations on these kinds of conversions may be worth exploring. Third, in addition to their effect on the overall level of rents, rent regulations also play an important role in promoting neighborhood stability and protecting long-term tenants.

USICH and the Biden-Harris administration should work to ensure the passage of the Equality Act.

BIPOC and LGBTQ+ individuals disproportionately experience homelessness in America. Right now, 50% of Americans live in states with no legal protections for LGBTQ+ individuals. That means LGBTQ+ can be denied housing, credit, service by a restaurant, store, or any business. The Equality Act, H.R.5/S.393, if passed, would amend the Civil Rights Act of 1964 (including titles II, III, IV, VI, VII, and IX) to prohibit discrimination on the basis of sex, sexual orientation and gender identity in employment, housing, public accommodations, education, federally funded programs, credit, and jury service.[11] This legislation would also expand existing civil rights protections for people of color by prohibiting discrimination in more public accommodations, such as exhibitions, recreation, exercise, amusement, gatherings, goods, services, programs, and transportation. The Equality Act would also allow the Department of Justice to intervene in equal protection actions in federal court on account of sexual orientation or gender identity. Finally, the bill prohibits an individual from being denied access to a shared facility, including a restroom, a locker room, and a dressing room, that is in accordance with the individual's gender identity.

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[11]The Equality Act of 2021, https://www.congress.gov/bill/117th-congress/house-bill/5