



collaborate • advocate • transform

Recommendations for HUD to Improve Policy to End Youth Homelessness

From National Network for Youth's National Youth Advisory Council

An estimated **4.2 million youth and young adults ages 13-25 experience homelessness every year** in the United States.¹ This estimate captures young people moving between different temporary situations from night to night, based on where they can find space or feel safe for the evening. Research has also found that 1 in 5 youth experiencing homelessness are trafficked for sex, labor, or both.² The long-term societal impacts of youth homelessness and trafficking can include an increased likelihood that young peoples' homelessness will extend into adulthood;³ an increased likelihood that they will have contact with the juvenile and criminal justice systems;⁴ and an increased likelihood of substance use and poor mental health outcomes,⁵ addressing all of which costs a significant amount across different agencies and programs.

Certain young people face greater risk for homelessness than others.⁶ Black and Indigenous youth are the most at risk of homelessness, with Black youth 83 percent more likely than white youth to become homeless, and American Indian and Alaska Native youth more than two times as likely to experience homelessness than non-Indigenous youth. LGBTQ+ youth are 120 percent more likely to experience homelessness than non-LGBTQ+ youth. There is also a disproportionate risk for homelessness among specific subpopulations, including pregnant and parenting youth, young people without a high school diploma, and young people involved in the child welfare or court legal system.

Young people who have experienced homelessness are at much greater risk of becoming trapped in a long-term cycle of homelessness. Studies have found that childhood and adolescent experiences can have a significant impact on an individual's likelihood to experience homelessness as an adult. These factors include unstable housing during childhood, running away as an adolescent, and dropping out

¹ Morton, M.H., Dworsky, A., & Samuels, G.M. (2017). Missed opportunities: Youth homelessness in America. National Estimates. Chapin Hall at the University of Chicago. https://www.chapinhall.org/wp-content/uploads/ChapinHall_VoYC_NationalReport_Final.pdf.

² Murphy, L. (2022). Labor and Sex Trafficking Among Homeless Youth: A Ten-City Study Executive Summary. Loyola University. <https://pact.cfpic.org/wp-content/uploads/2022/02/Loyola-Multi-City-Executive-Summary-FINAL.pdf>.

³ Parpouchi, M., Moniruzzaman, A. & Somers, J.M. The association between experiencing homelessness in childhood or youth and adult housing stability in Housing First. *BMC Psychiatry* 21, 138 (2021). <https://doi.org/10.1186/s12888-021-03142-0>.

⁴ Almquist, L. & Cusworth Walker, S. (2022). Reciprocal associations between housing instability and youth criminal legal involvement: a scoping review. *Health & Justice*, 10(15). <https://doi.org/10.1186/s40352-022-00177-7>.

⁵ Winiarski, D., Glover, A., Bounds, D., & Karnik, N. (2021). Addressing Intersecting Social and Mental Health Needs Among Transition-Age Homeless Youths: A Review of the Literature. *Psychiatric Services*, 72(3), 241-365. https://doi.org/10.1176/appi.ps.201900498open_in_new.

⁶ Morton, M.H., Dworsky, A., & Samuels, G.M. (2017). Missed opportunities: Youth homelessness in America. National Estimates. Chapin Hall at the University of Chicago. https://www.chapinhall.org/wp-content/uploads/ChapinHall_VoYC_NationalReport_Final.pdf.

of school.⁷ The experience of homelessness as a young person can have severe long-term consequences, negatively impacting an individual's ability to maintain stable housing as an adult.⁸

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 of homelessness, can our nation be a leader on the world stage in solving youth homelessness.** National Network for Youth's National Youth Advisory Council offers the following recommendations for the U.S. Department of Housing and Urban Development (HUD) for policy, regulation, and funding for HUD initiatives targeting youth homelessness.

Recommendations for HUD

Funding to Pay Youth with Lived Experience of Homelessness

Many communities enlist the expertise of young people with experience of homelessness as part of their Youth Homelessness Demonstration Program's (YHDP) Youth Action Board (YAB), or other projects dedicated to transforming community responses to preventing and ending youth homelessness. However, communities often do not have funding to compensate young people for their time in helping to develop these programs.

Recommendation: HUD should ensure there is a set aside included in YHDP funds for both grant years that is designated specifically to compensate YAB members.

Increased Flexibility in the Use of YHDP Funds

Because YHDP funding is disseminated through CoCs, projects must align with CoC Interim Rule, and any deviations from these guidelines require specific amendments or waivers to implement. However, receiving a waiver is a difficult process for communities to navigate, and as such, many communities have not been able to fund new or innovative projects. This seriously constricts communities' potential for creating flexible and dynamic responses to youth homelessness.

Recommendations: HUD should allow CoCs some flexibility in the use of YHDP funds to test and expand responsive housing and service options in communities. CoCs should empower youth and communities (especially rural communities) to determine what those responsive services might look like, and allow local providers to implement and experiment. Finally, planning grants should be renewable beyond the first year, acknowledging that planning and collaboration must continue year after year to maintain momentum, evaluate progress, and try new strategies.

⁷ Cohen-Cline, H., Jones, K., & Vartanian, K. (2021). Direct and indirect pathways between childhood instability and adult homelessness in a low-income population. *Children and Youth Services Review*, 120. <https://doi.org/10.1016/j.chilyouth.2020.105707>.

⁸ Parpouchi, M., Moniruzzaman, A. & Somers, J.M. The association between experiencing homelessness in childhood or youth and adult housing stability in Housing First. *BMC Psychiatry* 21, 138 (2021). <https://doi.org/10.1186/s12888-021-03142-0>.

Implement Youth-Specific Outcomes Across All Youth-Specific Projects

All of HUD's CoC-funded programs have the same outcome measures for success, despite these programs serving very different populations. These outcome measures are not in line with the four core outcomes for youth developed by the U.S. Interagency Council on Homelessness (USICH), which are widely accepted by youth homelessness experts. These outcomes are (1) social and emotional well-being; (2) permanent connections; (3) increased education or employment; and (4) stable housing.

For example, [Measure 4 of HUD's CoC System Performance Measures](#) (page 22) details positive outcomes for *Employment and Income Growth for Homeless Persons in CoC Program-funded Projects*.

The metrics for this measure are as follows:

- *Change in earned income for adult system stayers during the reporting period*
- *Change in non-employment cash income for adult system stayers during the reporting period*
- *Change in total income for adult system stayers during the reporting period*
- *Change in earned income for adult system leavers*
- *Change in non-employment cash income for adult system leavers*
- *Change in total income for adult system leavers*

In order to more accurately measure positive outcomes for youth and young adults, the following metrics should be added:

- *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)*

Recommendation: HUD should use USICH's four core outcomes for youth to accurately measure the success of its youth-serving programs.

Remove YHDP Match Requirements

Many communities want to bring in new grassroots organizations that do not have the funds to meet the YHDP match requirements. Supporting grassroots organizations increases communities' capacity to serve young people experiencing homelessness, to meet young people where they're at, and to increase equity.

Recommendations: HUD should waive or significantly reduce match requirements for both years of a YHDP grant. HUD should also examine the impact of match requirements on organizations run by or serving disenfranchised or marginalized groups, and on equity as a whole.

Guidance on Third-Party Documentation + Living in Unsafe Situations

Currently, there is no standard guidance for local Continuums of Care (CoC) and youth homelessness providers to document a young person's self-certification of homelessness. This is especially critical given the report language included in 2024 [appropriations report language](#):

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 subsection (a) or (b) of section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302) to receive services [page 340]

Further, HUD has not released guidance for CoCs and providers about how to implement the following 2024 [appropriations report language](#):

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 [page 340]

Recommendation: HUD should issue guidance and sample forms related to self-verification and living in unsafe situations. A sample form is an effective way to ensure policies are updated and implemented as swiftly as possible.