

December 3, 2019

Dear Chairs Collins and Price and Ranking Members Reed and Diaz-Balart:

The undersigned organizations write in strong support of the inclusion of either of the following provisions of the Homeless Assistance Grants section of the Transportation, Housing and Urban Development appropriations package in the final legislation:

*Provided further, That when awarding funds under the Continuum of Care program, the Secretary shall not deviate from the FY 2018 Notice of Funding Availability with respect to the tier 2 funding process, the Continuum of Care application scoring, and for new projects, the project quality threshold requirements, except as otherwise provided under this Act or as necessary to award all available funds or consider the most recent data from each Continuum of Care. (S. 2520 of 2019)*

*Provided further, That the Secretary shall consider and award projects based solely on the selection criteria from the fiscal year 2018 Notice of Funding Availability. (H.R. 3055 of 2019)*

These provisions, both of which would ensure that the Department of Housing and Urban Development (HUD) issues a 2020 Notice of Funding Availability (NOFA) for the Continuum of Care (CoC) program in which selection criteria match those of the 2018 NOFA, are critical in preserving the progress HUD has made toward ending homelessness among key populations, including youth, families, veterans, and people experiencing chronic homelessness.

The purpose of the CoC program is to provide funding to “quickly re-house homeless individuals, families, persons fleeing domestic violence, and youth while minimizing the trauma and dislocation caused by homelessness; to promote access to and effective utilization of mainstream programs by homeless individuals and families; and to optimize self-sufficiency among those experiencing homelessness.”<sup>1</sup> Over the past decade, communities have shifted their practices to better meet these goals by adopting Housing First strategies to remove barriers to accessing permanent housing and provide appropriate supports to people experiencing homelessness toward the goal of achieving better long-term outcomes. Housing First improves systems and reduces homelessness, including for youth. The evidence supporting this strategy is overwhelming, and between 2010 and 2018, it has helped reduce homelessness nationwide by 14.6 percent according to Point-In-Time counts.<sup>2 3</sup>

Housing First is especially critical for youth and young adults accessing services provided through their local Continuums of Care, who benefit greatly from immediate access to permanent housing solutions, individualized and trauma-informed services without preconditions or consequence-driven policies, and service provision that purposefully creates space for youth

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<sup>1</sup> SEC. 421. [42 USC 11378]

<sup>2</sup> United States Interagency Council on Homelessness. [The Evidence Behind Approaches that Drive an End to Homelessness](#). December 2017.

<sup>3</sup> Henry, M., Mahathay, A., Morril, T., [The 2018 Annual Homeless Assessment Report \(AHAR\) to Congress](#). The U.S. Department of Housing & Urban Development. December 2018.

self-determination. Housing First programs, when made available to young adults, can result in improved medical and behavioral health, reduced criminal justice involvement, lower rates of substance use, and better educational outcomes.<sup>4 5</sup> This is in contrast with the historical carceral approach to youth and young adult homelessness, which discourages youth agency and often results in youth and young adults who either avoid services altogether or experience multiple recurrences of homelessness without achieving long-term permanency and self-sufficiency.<sup>6</sup>

Despite the evidence and widespread support for Housing First, the 2019 NOFA for CoC programs amended Housing First criteria to allow applicants to earn full points, even if the applicant stated they would impose service participation requirements on a client after that client accessed housing. This shift in strategy is not evidence-supported, nor was it justified as such in the 2019 NOFA. We understand some service providers and provider-oriented advocacy groups have long-standing concerns about the organizational challenges that shifting to a Housing First approach presents. HUD's role is to help communities build systems that can best serve people experiencing homelessness, including young adults, not systems that work for any individual provider over another. We believe that until there is evidence to support new strategies that promise to further advance our efforts to end homelessness, HUD should continue to administer CoC funds with a strong preference for Housing First programs.

Additionally, and equally concerning, the 2019 NOFA contained no mention of LGBTQ populations experiencing homelessness. Among youth and young adults, LGBTQ people continue to experience homelessness at significantly higher rates than their straight and non-transgender peers. An estimated 40 percent of youth experiencing homelessness self-identify as LGBTQ, and LGBTQ youth are more than 120 percent more likely to experience homelessness.<sup>7 8</sup> Among transgender adults, one-third report experiencing homelessness at some point in their life, and 12 percent report experiencing homelessness in the previous year.<sup>9</sup> Transgender adults also report distressing levels of discrimination in attempting to access services while experiencing homelessness. Seven out of ten respondents to the 2015 U.S. Trans Survey—the largest survey of transgender Americans ever conducted—who stayed in a shelter in the past year reported some form of mistreatment, including being harassed, sexually or physically assaulted or kicked out because of being transgender.<sup>10</sup>

The 2018 NOFA included incentives for CoCs to conduct annual training on the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity rule, adopt CoC-wide nondiscrimination policies that include sexual orientation and gender identity, and implement affirmative outreach strategies for populations less likely to seek services, including LGBTQ people. Supporting CoCs in their efforts to address homelessness among LGBTQ people in their communities is a key component of any comprehensive strategy to address

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<sup>4</sup> Nicole Kozloff, Carol E. Adair, Luis I. Palma Lazgare, Daniel Poremski, Amy H. Cheung, Rebeca Sandu and Vicky Stergiopoulos. [Housing First for Homeless Youth With Mental Illness](#), Pediatrics. October 2016.

<sup>5</sup> U.S. Department of Housing & Urban Development. [Using a Housing First Philosophy When Serving Youth](#), May 2017.

<sup>6</sup> National Alliance to End Homelessness. [Could Shelter Policies Increase a Youth's Vulnerability to Sexual Exploitation?](#) April 2015.

<sup>7</sup> 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.

<sup>8</sup> Choi, S.K., Wilson, B.D.M., Shelton, J., & Gates, G. (2015). Serving Our Youth 2015: The Needs and Experiences of Lesbian, Gay, Bisexual, Transgender, and Questioning Youth Experiencing Homelessness. Los Angeles: The Williams Institute with True Colors United.

<sup>9</sup> National Center for Transgender Equality. [U.S. Trans Survey](#), December 2016.

<sup>10</sup> See 9.

homelessness.

The undersigned organizations are gravely concerned that without Congress' intervention the 2020 CoC NOFA will exacerbate the changes included in the 2019 NOFA, thereby undoing years of bipartisan progress to move local communities towards performance-based systems of care. Encouraging communities to pivot to performance-based systems increases the utilization and adherence to evidence-based policies that have been proven to reduce the number of people experiencing homelessness, saving the lives of people in dire circumstances. We respectfully urge you to preserve the language protecting the CoC NOFA that has already been passed by your respective Subcommittees. Without your intervention, we fear that well-intended efforts to provide greater flexibility within the NOFA will unfortunately result in unintended consequences that undermine our collective efforts to end homelessness in the United States.

Thank you for your careful consideration of our views. If you have any questions or would like to discuss further, please feel free to contact True Colors United's Public Policy and External Affairs Director, Dylan Waguespack, at [dylan@truecolorsunited.org](mailto:dylan@truecolorsunited.org) or 202-492-0107.

Thank you for your consideration.

Signed,

True Colors United  
Youth Collaboratory  
Fundors Together to End Homelessness  
National Coalition for Homeless Veterans  
National Innovation Service

A Way Home America  
National Alliance to End Homelessness  
National Low Income Housing Coalition  
Community Solutions International