

September 12, 2023

The Honorable Marcia L. Fudge  
Secretary  
U.S. Department of Housing and Urban Development  
451 7th Street S.W.  
Washington, DC 20410

Dear Secretary Fudge:

The Department of Housing and Urban Development (HUD) recently released the Notice of Funding Opportunity (NOFO) for fiscal year 2023 “Continuum of Care Competition (CoC) and Renewal or Replacement of Youth Homeless Demonstration Program (YHDP) Grants” (FR-6700-N-25). We, the undersigned organizations, are deeply concerned about new language included in this year’s CoC NOFO that would permit communities to “reallocate YHDP projects HUD initially awarded Round I YHDP to create new CoC grants. Reallocated YHDP grants are not required to serve Youth.”

The Youth Homelessness Demonstration Program is central to a nationwide effort to increase all CoC’s sophistication and ability to meet the needs of young people experiencing homelessness. Congress and HUD have invested significant resources in testing new flexibilities and encouraging closer coordination with youth with lived experience, with existing Runaway and Homeless Youth providers, and with “feeder” systems to youth homelessness such as child welfare and juvenile justice agencies. The demos have resulted in many new effective strategies and best practices for CoCs, which Congress is encouraging all communities to uptake and adopt. \$50 million has been appropriated over the last two years to support this effort through Systems-Change Improvement Grants under the YHDP program.

Allowing CoCs to reallocate YHDP funds to new projects not intended to serve youth will undermine this national effort to improve all CoCs’ systems for serving youth. Thanks to the ongoing investment in YHDP, we have the best knowledge to date on how communities can effectively serve youth. Now is the time to distribute and advance that knowledge throughout the entire CoC field. **It is vital that youth funding stay with youth projects. We respectfully request HUD issue an immediate correction to the NOFO stating that YHDP funding may only be repurposed for other youth programming and that waivers for eligible activities will be considered for appropriate youth projects.**

We are available to answer any questions regarding such guidance. Thank you for your consideration of our views.

Sincerely,

Youth Collaboratory

A Way Home America

California Coalition for Youth

Campion Advocacy Fund

Corporation for Supportive Housing

Covenant House International

Larkin Street Youth Services

National Network for Youth

Point Source Youth

Raikes Foundation

SchoolHouse Connection

True Colors United