

# NATIONAL GUIDANCE ON EMERGENCY HOMELESS SERVICES FOR YOUTH AND YOUNG ADULTS

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A GUIDE TO LEVERAGING FEDERAL EMERGENCY  
SOLUTIONS GRANTS IN SUPPORT OF YOUTH  
EXPERIENCING HOMELESSNESS FOR LOCAL  
ADMINISTRATORS OF HOMELESSNESS SERVICES



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## Q&A SUMMARY

During the current coronavirus pandemic, it's important to remember that young people experiencing homelessness will need additional support to meet their safety and health care needs. This document offers suggestions about how administrators can deploy the supplemental Emergency Solutions Grant (ESG) funding made available through the Coronavirus Aid, Relief, and Economic Security Act (CARES) to best serve young people. A high-level summary of these suggestions is below, with greater detail provided in the rest of the document.

**Engage youth-specific homeless service providers who may not be receiving ESG funding.** In many communities, youth-specific providers have not pursued ESG funding in the past but will need support from the \$4 billion in aid provided through ESG in the CARES Act. Congress intends for these dollars to serve all people experiencing homelessness, including youth and young adults.

**Encourage providers to tailor responses to the needs of young people of color and those who identify as LGBTQ.** Systemic racism has led to disproportionately high rates of COVID-19 infection and mortality among Black and African Americans; a population that is already disproportionately impacted by homelessness. It is critical that housing and service interventions prioritize the needs of these populations in the face of the pandemic.

**Invite young people with lived experience and providers to have input into the decision-making process, particularly young people of color and those who identify as LGBTQ.** Trust and rely on those with lived experience to give an unvarnished view of your decisions. Because historically marginalized populations are not often represented in groups of decision makers, their needs are often not met in service provision. Their involvement will ultimately save time and resources, and therefore lives, by offering feedback and nuance to assumptions and decisions in real-time.

**Supplemental ESG funding can be used to address both the immediate health and safety and long-term needs of young people.** This funding can be used to complement annual baseline funding for youth and young adults experiencing homelessness by offering flexibility in short-term services and by furthering efforts to prioritize youth for short- and medium-term housing supports.

**Administrators and providers can leverage HUD waivers and offer needed flexibility in service provision.** States and communities can leverage waivers available through HUD to increase flexibility for providers and people experiencing homelessness. State and local restrictions on the length of Rapid Re-Housing programs and the ability to offer comprehensive services across program components could be lifted to ensure young people's needs can be met in the context of increased strains on their individual resources and networks.

This document offers recommendations for supporting youth and young adults (YYA) at risk of or experiencing homelessness through the \$4 billion in supplemental Emergency Solution Grant Program (ESG) funding that is being made available through the U.S. Department of Housing and Urban Development (HUD) in response to the coronavirus pandemic.

## WHY DO ESG ADMINISTRATORS NEED TO FOCUS SPECIFICALLY ON YOUTH AND YOUNG ADULTS AT RISK OF AND EXPERIENCING HOMELESSNESS?

Congress intentionally funneled relief funding for people experiencing homelessness through the ESG program due to its existing flexibility. While funding existing or past grantees would be the most expedient process in many communities, youth and young adult-specific homeless service programs are not currently funded through ESG in many communities. This document is intended to help ESG administrators expedite the process of shaping new funding priorities and recruiting new grantees to ensure that the response to the pandemic does not overlook youth and young adults at risk of or currently experiencing homelessness.

We know that adult-focused homeless service programs are often inappropriate and/or dangerous settings for youth and young adults and should not be the only option available in any community. We also know that homelessness disproportionately affects young people of color, [particularly young people who also identify as LGBTQ](#), and adult-serving organizations are often unable to meet their specific safety and physical and mental health care needs. However, due to school closures, layoffs, and other pandemic related problems, many youth and young adult homeless service providers have already reported that they have reached or exceeded capacity and YYA are spending more hours overcrowded indoors.

These settings are poorly suited for accommodating social distancing, leaving young people seeking services and the staff of these facilities vulnerable to novel coronavirus cluster outbreaks. ESG administrators could alleviate these challenges by prioritizing funding for housing and services that align with [CDC guidelines](#), **which emphasize individual or family unit housing options for social distancing.**

We are making this call to consider expanding the scope of recipients of ESG funding because additional funds included in the emergency supplemental legislation for Runaway and Homeless Youth (RHY) programs only amounted to \$25 million, which will not be sufficient in response to the pandemic, particularly since many communities do not have RHY programs.

## HOW CAN YYA AND YOUTH PROVIDERS HELP INFORM FUNDING PRIORITIES AND STRATEGIES?

Youth and young adults should be included in decision-making bodies and processes to determine how supplemental funding is being spent locally. It is critical that all funders engage and give increased attention to representatives of historically marginalized and underserved communities, including youth and young adults experiencing homelessness, as they shape funding priorities in response to the current coronavirus pandemic. As with traditional ESG formula grants, this supplemental funding can be deployed strategically and in coordination with Continuums of Care (CoCs), as well as local governments, public health officials, and other nonprofit service providers to understand the scope of unmet needs locally.

The long-standing disproportionate impact of homelessness and housing instability on young people of color is being compounded by the disproportionate rates of COVID-19 infections among people of color, raising the urgency of responses and services tailored to the specific needs of these communities. Individuals and organizations that serve and represent citizens returning from incarceration, undocumented immigrants, LGBTQ populations, and harm reduction collectives can be key partners in decision-making and informing state- and community-wide responses to the pandemic.

## WHAT ADDITIONAL CONSIDERATIONS CAN GUIDE FUNDING DECISIONS FOR PROGRAMS THAT SERVE YOUNG PEOPLE?

### **Protect vulnerable populations**

Youth and young adults who identify as LGBTQ+ experience high rates of discrimination and risk of sexual exploitation when experiencing homelessness, especially transgender and gender-expansive youth.

ESG-funded projects should place individuals into housing options based on individuals' gender identity, rather than sex assigned at birth, or based on where a transgender or gender-expansive individual feels safest. Transgender people should not be given different or unequal accommodations as other individuals. Providers have a legal obligation to provide equal service to transgender people based on their gender identity, and ESG administrators have a responsibility to ensure that obligation is met. The 2016 HUD guidance on Equal Access for Transgender people provides a helpful framework and can be found at the [NAEH website](#).

### **Center youth of color**

Rates of youth homelessness and COVID-19 infection are disproportionately high among communities of color, particularly Black and African Americans, when compared to their representation in the general population. [Cities and states are reporting](#) that Black and African Americans make up 35-50 percent of those infected with the novel coronavirus and 40-81 percent of those who die from the virus, despite Black and African Americans only comprising 13% of the population nationwide. These data points are clear indicators of decades of systemic racism within our housing, employment, and health care sectors.

The dynamics of this virus dictate that it will continue to have a disproportionate impact on other historically marginalized populations across the country, as those with fewer resources to shelter-in-place, work from home, arrange for or afford safe child care, and those with health care preconditions and limited access to care are most at risk of contracting the virus.

In the face of this pandemic, national and local responses to youth homelessness should center the voices and needs of young people of color to ensure they are addressing and correcting the systemic flaws which lead to this disproportionate impact. By designing for those who have been most marginalized, these systems will be much better suited to accommodate everyone within and between the margins. This principle is a critical component of the nationwide response to the novel coronavirus in order to slow and curb its spread at all levels, from funding priorities to program design.

### **Support youth-centered service provision**

Meaningful youth collaboration has been identified as a best practice by organizations working to end youth homelessness nationwide. ESG-funded projects for youth and young adults can further support young people by involving young people with experiences of homelessness meaningfully during the planning, decision-making and evaluation processes. Stipends honor that youth and young adults are experts in their own experiences, provide an opportunity for young people to offer invaluable insights to making services more effective, particularly during a time of crisis where creativity and new solutions are needed, and generate income for young people during a time of mass job insecurity.

## **WHAT SERVICES COULD ESG FUND FOR YOUTH AND YOUNG ADULTS?**

The following services, which can be funded through ESG, will be critical to programs serving young people at risk of and experiencing homelessness in the coming months:

- **Outreach and Engagement** that is connected to health care and other services, case management, and zero-barrier housing

- **Targeted community outreach** to youth from marginalized communities, especially those who may be less likely to seek services they need, including immigrants and LGBTQ+ individuals
- **Transportation** for young people who do not have access to essential services such as grocery stores, pharmacies, and their jobs
- **Food and regular medicine delivery** for young people living unsheltered and those who have limited or no access to grocery stores, pharmacies, and SNAP and WIC benefits
- **Case management** for youth who are living unsheltered, in crisis housing, and in rapid re-housing programs
- **Child care** for young people who are parenting and working or seeking services
- **Telehealth** for mental and physical health care for young people experiencing homelessness
- **Education Services** to support youth and young adults in continuing their education, including securing WiFi and other necessary technology and access points (tablets or computers) to participate in distance learning
- **Services for Special Populations** can include trauma-informed housing and services for young people who have been commercially sexually exploited (sex-trafficked)

There is guidance below to help eliminate constraints on these services across program component types.

## WHAT HOUSING AND SHELTER OPTIONS CAN ESG FUND FOR YOUTH AND YOUNG ADULTS?

### Homelessness Prevention and Diversion

Homelessness prevention services will be a key component to slowing the current coronavirus epidemic as most of the country is operating under prolonged shelter-in-place orders. The financial strain on individuals and families due to the economic consequences of the coronavirus is considerable and disproportionately impacts low-income workers. Homelessness prevention services, rental assistance, and financial assistance, will keep people safely housed, thereby increasing the effectiveness of social distancing and aiding public health authorities as they work to control this disease.

Programs that prioritize prevention, identification, early intervention, and diversion for youth and young adults will be more expedient in serving those who are couch surfing or at risk of homelessness. ESG administrators could seek to fund homeless service providers who work with their local child welfare agencies, schools, drop-in centers, juvenile justice and law enforcement offices, street outreach providers, and/or other local community programs to identify young people at risk.

### Emergency Shelter and Crisis Housing

Emergency or crisis housing options for youth and young adults include emergency shelter services, host home programs, and short term transitional living stays. These solutions have been created in communities with limited or no transitional youth specific emergency shelter services. Short term transitional living stays have demonstrated an alternative strategy to providing crisis housing

while determining longer term and permanent housing options, while host homes and shelters will be difficult settings for accommodating social distancing during the COVID-19 pandemic.

Emergency shelter providers are carefully juggling competing considerations in relation to emergency shelter capacity, including: 1) quickly moving people from shelter into housing; 2) implementing social distancing measures inside shelters; 3) maintaining local shelter capacity; 4) creating more shelter options for those currently unsheltered; 5) creating space for quarantine and serving people that have tested positive for the coronavirus, are presumed positive, and those who have symptoms of the virus; and 6) staff capacity, protection, and hazard pay.

Hotel/motel vouchers, funding for shelter operations, and shelter renovations are tremendously valuable resources for youth-specific providers as they navigate these competing concerns and limited additional resources.

Funders could support providers and clients alike by adjusting expectations around capacity and spending in shelters during the pandemic. Shelters will be able to serve fewer people but will incur higher costs. It will be more expensive to run shelters based on the needs for personal protective equipment, more frequent cleaning and cleaning supplies, increased costs for those materials and services, and the need to serve fewer people to accommodate social distancing safety requirements.

### **Rapid Re-Housing**

Rapid Re-Housing is an effective housing support for young adults experiencing homelessness and could be considered as a funding priority for ESG administrators in disbursing stimulus and relief funds to support longer-term stability for young people experiencing homelessness. It is critical for youth-specific programs to be considered in this funding priority or for programs to identify how they prioritize and serve young people, including young people who are parenting or heads of household.

To be a sustainable and effective intervention in the face of the coronavirus pandemic, ESG administrators and other funders can consider loosening time limits and re-application requirements for rapid re-housing for young people and adults alike. Unemployment rates will continue to rise and employment opportunities, particularly for youth, will be limited and highly competitive for the foreseeable future, even once the spread of the virus slows.

### **Improving support for frontline staff**

The essential work of frontline staff is the backbone of homeless service systems and we must ensure that the workforce is substantially supported as increased strain is applied to our systems and to these individuals across program component types. Funders can alleviate these stresses by including hazard pay for frontline staff, surge staffing, hiring people with lived expertise, training new staff, and supplying and replenishing stores of PPE.

## WHAT ADMINISTRATIVE OR REGULATORY CHANGES MAY BE NECESSARY TO ACCOMMODATE THE NEEDS OF YOUNG PEOPLE EXPERIENCING HOMELESSNESS?

The spread of COVID-19 and its impacts on the economy will require that local responses to homelessness offer more flexibility and accessibility. While the ESG Program does not fund long-term housing, it is a critical resource for medium-term rental assistance and services. State and local ESG administrators can coordinate with youth-serving providers and, if needed, the state regulatory entities to determine whether emergency rulemaking is necessary to lengthen allowable lengths of stay, adjust staff to client ratio requirements, and loosen other regulations that may make it more difficult for homeless service providers to meet community needs during this crisis.

**Increase Service Accessibility:** ESG administrators could offer flexibility for grantees and subgrantees to move funding and costs **between** different types of components (homelessness prevention, street outreach, emergency shelter, rapid re-housing, and Homeless Management Information Systems) to ensure that individuals' needs can be met regardless of the type of component they are primarily served through. ESG administrators may need to create new contract vehicles or contract amendments to facilitate this necessary flexibility.

**Eliminate Delays for Parent/Guardian Consent:** YYA providers and funders should note that achieving parental consent or timely parental notification in youth homelessness services is often difficult, sometimes impossible, and rarely necessary. It can be a deterrent to seeking services among unsheltered youth, youth who have experienced abuse, and youth who participate in survival economies who may fear child welfare or criminal legal system involvement. In 32 states<sup>1</sup> emergency rulemaking or legislative action may need to be undertaken to allow youth-serving providers to take in youth experiencing homelessness with a delay or waiver of notification and parent/guardian consent requirements.

**Maximize Rental Assistance:** HUD allows for medium-term rental assistance to be offered for up to 24 months through ESG funding. Program administrators and other funders can fully embrace this flexibility and leave it to the discretion of providers to determine how long rental assistance is needed for program participants in the face of this pandemic that is increasing unemployment rates and housing instability exponentially.

Increasing time limits on rapid re-housing may result in fewer people served, but the significant

<sup>1</sup>The following states currently do not allow providers to waive or delay notification and/or parent/guardian consent requirements for minor youth: AL, AK, AZ, AR, CA, CO, CT, DC, GA, HI, ID, IA, KS, KY, MD, MI, MS, NE, NV, NM, NC, ND, OH, OR, PA, SC, SD, TN, VT, VA, WV, WY

See more: [True Colors United and National Law Center on Homelessness and Poverty: 2019 State Index on Youth Homelessness](#)

increase in funding should be used to maximize flexibility to ensure that people served do not return to homelessness. Short-term rental assistance will be insufficient for most for the foreseeable future and will only create more strain on our homeless service systems as the pandemic goes on.

## WHAT OUTCOMES AND EQUITY-DRIVEN METRICS CAN BE TRACKED TO CAPTURE INFORMATIVE DATA DURING THE PANDEMIC?

Communities can be using data to inform their response to the novel coronavirus and to better understand the impact of the virus on people experiencing homelessness and on the homeless response system. Early data from sources such as [Michigan's Department of Health and Human Services](#) are already illustrating that African Americans are being infected at higher rates, due to long-standing systemic racism that puts them at higher risk of contracting the virus. Data should be used for planning and advocacy in every community.

ESG administrators can work with CoC leads and other local partners to monitor local trend lines, with particular attention to race demographics and the disproportionate impact the novel coronavirus is having on communities of color. It's important to ensure local homeless service system data can be disaggregated by demographics, including race/ethnicity, gender identity, and age. Administrators can work with HMIS leads to better understand what data is available and what changes may need to be made to collect more accurate and informative data in response to the pandemic.

## WHAT ARE THE MID- AND LONG-TERM IMPLICATIONS TO CONSIDER WHILE MAKING EMERGENCY DECISIONS?

The recommendations and guidance throughout this document does not assume that ESG will be able to continue these levels of funding, but rather that it is a necessary resource for emergency funding in immediate response to the pandemic. As Congress deliberates future emergency supplemental funding packages, advocates are already working to ensure there's a shared understanding of the need for ongoing funding to ensure the mid-term and long-term continuation of services for youth and young adults experiencing homelessness, and therefore the mid-term and long-term health of our communities.

ESG administrators can work with recipients of other federal funding sources to understand how ESG can complement their efforts to support youth and young adults at risk of and experiencing homelessness. Those funding sources are available through: the Workforce Investment Opportunity Act (WIOA), the McKinney-Vento Homeless Assistance Act, the Runaway and Homeless Youth Act, the Chafee Foster Care Independence Program, and the Title IV-E Federal Foster Care Program. Young people engaged in services funded through these programs, as well as administrators and recipients, will be valuable partners in planning and information-gathering processes as funders work to ensure that immediate responses to the current pandemic inform ongoing and future funding priorities.