**Comments submitted by Ruth White**

**February 7, 2022**

**Docket No. FR-6284-N-01, “Implementation of the Fostering Stable Housing Opportunities Amendments”**

I’m writing to thank The U.S. Department of Housing and Urban Development (HUD) for listening directly to youth with lived experience. The FSHO amendments that HUD implemented on January 24, 2022, were written over the course of three years by foster youth and alumni of care along with their champions in the U.S. Congress.

FSHO eliminates long-standing flaws in HUD’s Family Unification Program (FUP) vouchers for youth (FUPY) and codifies the Foster Youth to Independence (FYI) Initiative “on demand” distribution mechanism for FUPY vouchers. FSHO also codifies the FUP – Family Self-Sufficiency (FSS) Demonstration program carried out by HUD at the direction of the U.S. Congress in 2016.

Foster youth and alumni of care worked for over six years to design FSHO and FYI based on their lived experience, painstaking research of peer-reviewed literature and HUD regulations, and the FUP-FSS Demonstration and similar PHA efforts to couple FUP and FSS that have been underway in communities throughout the U.S. for more nearly two decades.

I ask that HUD continue to work directly with youth and alumni of foster care to ensure that the implementation of FSHO creates a predictable pathway to economic independence and housing stability for their brothers and sisters in care nationwide. I urge HUD to avoid making any significant changes to FSHO unless those changes have been generated by or vetted by youth and alumni of care.

Below please find answers to the three questions on certain provisions of FSHO that HUD specifically mentioned in the January 24, 2022 Federal Register Notice:

**Question for Comment 1.**

“In order to receive an extension of FUPY/FYI assistance, should the cut-off for requiring a youth to enroll in the FSS program be the 36-month mark or is a different cut-off more appropriate based on the requirements of the FSS program?”

**Answer for Question for Comment 1**:

No. Due to a long-standing failure at the national level to universalize the Family Self-Sufficiency Program (FSS) for tenants participating in HUD’s Housing Choice Voucher Program (and thus, FUPY/FYI) the reach of the FSS program and the timing of available spots varies considerably between PHAs. Thus, PHAs should continue to offer FSS participation to youth on a rolling basis, as available, throughout a young person’s participation in FUPY/FYI regardless of the length of time available in their FUPY/FYI voucher assistance.

**Question for Comment 2**.

“Should HUD establish a minimum number of classes or credits that a youth must be enrolled in or a minimum number of hours that a youth must work in order to receive an extension of FUPY/FYI assistance under this provision?”

**Answer for Comment 2:**

No. Enrollment matters related to coursework and the minimum number of classes or credit hours to satisfy academic progress is arranged between students and the professionals employed by institutions of higher education and postsecondary vocational institutions that is beyond the scope of the U.S. Department of Housing and Urban Development and the state and local housing agencies HUD contracts with to administer housing assistance. For the purpose of extending FUPY/FYI public housing authorities must simply verify that a student is enrolled.

**Question for Comment 3.**

“Should HUD establish a maximum number of classes or credits or a maximum number of work hours that a PHA may require in order for a youth to receive an extension of FUPY/FYI assistance under this provision?”

**Answer for Comment 3:**

No. Enrollment matters related to coursework and the maximum number of classes or credit hours that an individual student should assume in an academic term is arranged between students and the professionals employed by institutions of higher education and postsecondary vocational institutions that is beyond the scope of the U.S. Department of Housing and Urban Development and the state and local housing agencies HUD contracts with to administer housing assistance. The youth-written statutory language in FSHO is clear. For the purpose of extending FUPY/FYI public housing authorities must simply verify that a student is enrolled in an “institution of higher learning” or a “postsecondary vocational institution.”

Thank you for this opportunity to comment on FSHO, an invaluable solution to ending homelessness for youth aging out of foster care. HUD must implement this solution in it's purest form and in keeping with the spirit and intent with which the foster youth, the experts they consulted along the way, and their champions in Congress, we can end homelessness FSHO.