



April 15, 2020

The Honorable Mitch McConnell
U.S. Senate
Washington, DC 20510

The Honorable Nancy Pelosi
U.S. House of Representatives
Washington, DC 20510

The Honorable Chuck Schumer
U.S. Senate
Washington, DC 20510

The Honorable Kevin McCarthy
U.S. House of Representatives
Washington, DC 20510

RE: Recommendations from foster youth and alumni for CARES II involving immediate adjustments to the John H. Chafee Foster Care (Chafee) Program for Successful Transition to Adulthood and improved synchronization with HUD programs in order to prevent and end homelessness related to COVID-19

Dear Speaker Pelosi, Majority Leader McConnell, Minority Leader McCarthy, and Minority Leader Schumer,

We write on behalf of 54,000 foster youth, alumni, and allies who comprise the *Fostering Stable Housing Opportunities Coalition* (the authors and supporters of “FSHO” S. 2803/H.R. 4300 and HUD’s Foster Youth to Independence “FYI” Initiative) to express our deep appreciation for everything you are doing to keep all Americans safe.

Your tireless efforts to combat the COVID-19 outbreak are not going unnoticed. The speed with which you have worked together to advance meaningful relief through Congress is awe-inspiring. We hope that in the midst of worrying about all of us, you find some time to rest and take care of yourselves. We send our prayers and best wishes that you, your staff members, and your families remain healthy and strong during this difficult time.

We understand that planning is underway for a fourth, equally impressive COVID-19 relief package known as CARES II. We write to implore you to consider the economic hardship that this protracted COVID-19 response, while necessary, will levy upon our 437,283ⁱ “brothers and sisters” in foster care. Specifically, we write to draw your attention to solutions crafted by foster youth themselves to meet the unique challenges of the 17,103ⁱⁱ wards of the state who are due to emancipate from state care this year. As you know, the barriers they face to success are formidable, even under the best of circumstances.

Among the former foster youth who successfully gain access to higher education, 10,000 former foster youth who live in on-campus housing and are at risk of homelessness as colleges increasingly de-populate dorms to accommodate social distancing and staff safety^{iiiiv}. Still more youth will be displaced from work and unable to make pay their rent temporarily. Alone and facing this crisis, former foster youth nationwide are already reporting numerous struggles through a COVID-19 survey by FosterClub including:

- 28% described their home as having a food crisis or being very low on food

- 39% indicated that they had been forced to move or fear being forced to move
- 27% had been laid off and another 40% had their hours severely cut
- 33% have less than a week’s worth of cash on hand
- 23% said they wished they had more people to help them through the crisis^{vi}

These numbers are staggering and unforgivable. State child welfare leaders simply must find their footing and quickly establish relief efforts for former foster youth. Thankfully, Congress has provided states with an expedient, agile tool with which to meet these emerging needs, **The John H. Chafee Foster Care (Chafee) Program for Successful Transition to Adulthood**. Thanks to Rep. Bass Chafee funding is available to assist young people through the age of 23. The flexible and universal nature of the Chafee program makes it the obvious source for a nimble, robust rapid response for current and former foster youth.

We offer five recommendations to ease the regulatory burden on states and improve synchronization of Chafee with HUD’s programs to eliminate the gaps through which youth might fall into homelessness during this unprecedented national crisis:

- Lift the 30% cap on room and board in Chafee
- Extend Chafee eligibility to age 23 nationwide
- Include and pass the *Fostering Stable Housing Opportunities Act*
- Synchronize Chafee with HUD’s Foster Youth to Independence (FYI) Initiative
- Provide emergency supplemental funding for Chafee for six months

RECOMMENDATION #1

Lift the statutory cap of 30% on room and board

Alumni, led by Lisa Dickson from ACTION Ohio, reached out to the Children’s Bureau on March 11, 2020 to urge the associate commissioner to issue guidance to child welfare professionals to tap the Chafee Program to meet the housing and income needs for students displaced from dorms and work study arrangements. Associate Commissioner Milner agreed that the most expedient tool **available to help former foster youth is the Chafee Act**. Dr. Milner issued a letter to child welfare professionals imploring them to consider tapping Chafee funds to meet the needs of displaced youth on March 12, 2020.

In this letter, Dr. Milner encourages states to tap the 30 percent of their Chafee allotment available for “room and board.” This averages out to roughly \$780,000 per state but because Chafee funding has lost the agility and flexibility that Congress intended it to have, much of this funding is tied up in existing contracts or otherwise allocated. **Thus, we recommend that Congress lift this cap temporarily as states deal with the COVID-19 crisis.**

RECOMMENDATION #2

Automatically extend Chafee eligibility to age 23 across the U.S.

The Family First Prevention Services Act allowed states the option of extending eligibility to age 23. Some states are not aware that they have the latitude to add this older population to their State Child and Family Services Plans and therefore, forfeit the opportunity to assist this vulnerable group of emerging adults. In order to ensure that states can adequately serve youth through the age of 23 during this national crisis, **we urge Congress to include an automatic extension of Chafee eligibility to age 23 in the emergency supplemental bill**. We also encourage Congress to allow the

Children's Bureau to interpret age the way that HUD interprets age. For example, HUD's Family Unification Program is available to youth ages 18 to 24. HUD accepts referrals to the program up to a young person's 25th birthday, thereby granting an entire year of eligibility. We hope that Congress will offer HHS the same latitude so that Chafee can serve youth through their 23rd year. Similarly, a simple tweak in legislative language could allow foster youth ongoing services as they transition to independence through their 22nd birthday.

RECOMMENDATION #3

Pass the Fostering Stable Housing Opportunities Act (HR 4300/S 2803)

As you know, Reps. Bass and Turner worked tirelessly with Financial Services Committee Chairwoman Waters, and Rep. Dean, and Rep. Stivers in consultation with our organizations and directly with foster youth to craft the straight-forward, yet sophisticated solution to the synchronization flaws of HUD's evidence-based housing program for child welfare families and youth, the Family Unification Program (FUP) to Congress. The bill passed the House on a voice vote on November 7, 2019 and is supported by powerful national organizations including the Center on Budget and Policy Priorities, the Public Housing Authority Directors Association, the National Association of Housing Redevelopment Officials, the Child Welfare League of America, the National Low-Income Housing Coalition, and the Children's Defense Fund.

We feel it is our duty to point out that the FSHO components (the time-limited nature of the resource, the required supportive services, and the distribution mechanism) are remarkably well-matched for the agility and expediency required to meet housing needs during a national emergency.

- offers a three-year Family Unification Program Housing Choice Voucher Housing to all young people leaving foster care who are at risk of homelessness, properly-timed with their emancipation
- eliminates geographic disparities by offering a voucher to youth regardless of where they live
- each voucher is coupled with supportive services designed to assist residents to achieve self-sufficiency when the voucher payment ends
- offers youth the opportunity to extend the voucher by two years (for a total of five) by voluntarily participating in self-sufficiency activities.

It is equally important to note that at the request of the FSHO Coalition, HUD Secretary Ben Carson has already implemented the portions of FSHO that fell within his existing regulatory authority in the form of FYI. The two-year extension noted above is the only part of FSHO that Sec. Carson could not implement without Congressional action. Thus, FYI, having already been implemented by HUD's Public and Indian Housing Department offers an important prototype for how HUD can move forward with an updated version of the Disaster Housing Assistance Program in the face of COVID-19.

FSHO was designed by youth to eliminate homelessness in the face of a predictable housing disruption. FSHO referrals can be perfectly timed with extended foster care and Chafee resources, giving youth and their advocates time to locate suitable apartments, employment, social connections, and educational opportunities. Once housed, a young person has access to a range of services designed to encourage and ensure their self-sufficiency once the voucher expires. In fact, as quite remarkably, FSHO appears to address and correct many of the flaws of the Interagency Agreement (IAA) formed between HUD and the Federal Emergency Management Administration (FEMA) through the Disaster Housing Assistance Program revealed by both the Department of Homeland Security Office of the Inspector General (2011) and HUD's Policy Development and Research

department (2013) ^{vii}^{viii}. FSHO and its streamlined sister, FYI, provide excellent roadmaps for HUD's upcoming response to the wave of emergency, intermediate, and long-term housing needs in the general public due to COVID-19 economic adjustments.

It is only fitting that Congress include S. 2803/H.R. 4300 in the passage of CARES II as an acknowledgement and affirmation of the sophistication, painstaking research, and hard won personal experience with which foster youth attacked and solved the issue of housing instability for all marginalized low-income Americans.

RECOMMENDATION #4

Match Chafee funding to ensure the success of HUD's Foster Youth to Independence (FYI) Initiative

HUD's new FYI Initiative is the portion FSHO that was within the regulatory authority of the Secretary of the U.S. Department of Housing and Urban Development. After meeting with foster youth from *the Fostering Stable Housing Coalition* on March 4, 2019 and learning directly from them that providing time-limited Family Unification Program (FUP) Vouchers "on demand" anywhere in the US through HUD's Tenant Protection Fund (for which FUP is an eligible use), Sec. Carson immediately tasked HUD leadership to implement the proposal, naming it the Foster Youth to Independence (FYI) Initiative. HUD issued the FYI Notice (PIH 2019-20 (HA)) on July 26, 2020. Since that time, nearly 1,000 youth have received "on demand" vouchers, or just over \$4 million from HUD's Tenant Protection Account.

While HUD is prepared to spend more than \$20 million to meet the permanent housing needs of former foster youth who are homeless or at risk of homelessness, child welfare agencies have been slow to embrace this program. Consequently, and quite unnecessarily, more than 25% of former foster youth experience homelessness each year. The ranks of homeless former foster youth are already beginning to grow in the face of this national disaster. The U.S. Children's Bureau must embrace FYI with the same sense of urgency and vigor demonstrated by Sec. Carson, the HUD leadership team, regional administrators, and career staff. In fact, Dr. Carson designated the HUD Region IX Administrator, Christopher Patterson, a former ward of the state, Job Corp participant, and child welfare professional as the national lead on FYI. Regional Administrator Patterson is active on social media, speaks directly with foster youth regularly to seek their input on the program, and has traveled all over the US ensuring that PHAs and PCWAs nationwide are aware of this vital and readily available resources for his brothers and sisters in care. Child welfare professionals simply must adopt this same level of seriousness in raising awareness about FYI. Moreover, the field must take more seriously the directives given to them by this Caucus over the years to ensure the economic self-sufficiency and housing stability of children who reach adulthood alone in foster care.

Despite Congress's intent to have Chafee reach every current and former foster youth under the age of 23, all too many local public child welfare agencies are forfeiting FYI Housing Choice Vouchers on behalf of the homeless and at-risk youth in their counties because, **curiously, these agencies cannot identify a suitable funding source for independent living services current and former foster youth.**

Thus, we believe that Congress must further guide child welfare agencies in the right direction by synchronizing Chafee funds with FYI in order to end homelessness among youth leaving care. We recommend that Congress increase Chafee Funding to match HUD's Investment in FYI. HUD anticipates that the annual investment in FYI is likely to reach \$20 million in 2020. In order to assure that FYI youth receive housing counseling/case management services and one-time housing costs (e.g.: first month's rent, security deposit, utility connection fees) for each voucher holder under

HUD's new FYI Initiative at a rate of \$15,000/FYI voucher over (or \$5,000/ year for three years). Thus, we recommend that Chafee Program funding be increased by \$30 million and states be required to match FYI vouchers with services and support. One simple way to reinforce their obligation is to tie Chafee funding to each FYI voucher.

Recommendation #5

Infuse \$255 million in supplemental dollars to Chafee for unexpected housing needs, financial hardship, and social connection during "social distancing"

We recommend that Congress increase Chafee funding for six months with emergency supplemental funding to states of \$255 million^{ix} to accommodate additional youth up to age 23 and to meet various, emerging needs related to COVID-19 disruptions. An immediate infusion of funding will allow states to rapidly curb housing instability, replace lost wages, and mitigate other unanticipated disruptions related the prevention of disease spread. This funding can also be used to put into place the necessary equipment to access online learning platforms and cell phone access to reach out to social supports and telehealth. Chafee is an important tool to keep youth on the path to independence and self-sufficiency during this confusing time.

Again, we are indebted all indebted to you for all that you and your staff members are doing to keep Americans safe. It gives us great comfort at this time of national unrest to know that you all are leading the way through this crisis. If you have any questions about these recommendations please feel free to contact Ruth White at rwhite@nchcw.org or 202-270-7336 or Lisa Dickson lisa@fosteractionohio.org.

With admiration and appreciation,



Ruth White
Executive Director
National Center for Housing
and Child Welfare



April Michelle Rivera-Curtis
President
Foster Care Alumni of America



Jamole Callahan
Director of Training & Development
ACTION Ohio

ⁱ Adoption and Foster Care Analysis and Reporting System. (2017). Washington, D.C.: U.S. Dept. of Health and Human Services, Administration for Children and Families, Administration on Children, Youth and Families, Children's Bureau.

ⁱⁱ Ibid.

ⁱⁱⁱ Bill & Melinda Gates Foundation. (2020). *Today's College Students*.

<https://postsecondary.gatesfoundation.org/what-were-learning/todays-college-students/>

^{iv} US Government Accountability Office. (2016). *Actions Needed to Improve Access to Federal Financial Assistance for Homeless and Foster Youth*. <https://www.help.senate.gov/imo/media/doc/d16343.pdf>

^v Fernandes-Alcantara, A. (2019). Youth Transitioning from Foster Care: Background and Federal Programs. Congressional Research Services. <https://fas.org/sgp/crs/misc/RL34499.pdf>

^{vi} FosterClub. (2020). *The Coronavirus (Covid-19) Emergency: Information and assistance for young people in and from foster care*. <https://www.fosterclub.com/c19>

^{vii} Department of Homeland Security Office of the Inspector General. (2011). *Effectiveness and costs of FEMA's Disaster Housing Assistance Program*. https://www.oig.dhs.gov/assets/Mgmt/OIG_11-102_Aug11.pdf;

^{viii} USHUD Policy Development and Research. (2013), *Study of Household Transition from the Disaster Housing Assistance Program (DHAP-Katrina) Final Report*.

<file:///C:/Users/ruthw/Downloads/805654.pdf>

^{ix} We arrive at this figure by assuming that if 17,000 youth age out per year, then there are potentially three years' worth of Chafee-eligibly young people in the US at any given time or 51,000 young adults. Further we estimate that the average cost of economic assistance for these youth is \$5,000 over six months. This brings the potential cost of emergency assistance to \$255 million for six months.