



Alliance to End Slavery and
Trafficking
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February 29, 2016

The Honorable Mario Diaz-Balart, Chairman
House Appropriations Subcommittee on Transportation, Housing and Urban Development, and
Related Agencies

The Honorable David Price, Ranking Member
House Appropriations Subcommittee on Transportation, Housing and Urban Development, and
Related Agencies

The Honorable Susan Collins, Chair
Senate Appropriations Subcommittee on Transportation, Housing and Urban Development, and
Related Agencies

The Honorable Jack Reed, Ranking Member
Senate Appropriations Subcommittee on Transportation, Housing and Urban Development, and
Related Agencies

Dear Chairman Diaz-Balart / Chairwoman Collins and Ranking Members Price and Reed:

On behalf of the Alliance to End Slavery and Trafficking (ATEST) and the undersigned organizations, we are writing to urge you to fund important programs to combat human trafficking and forced labor in the FY 2017 Transportation, Housing and Urban Development (HUD) Appropriations bill and include report language to further assist in anti-trafficking efforts.

1. HUD Homeless Assistance Grants: Continuums of Care (CoC) For Youth

Within HUD's Homeless Assistance Grants program, we request \$33,000,000 to implement projects to demonstrate how a comprehensive approach to serving homeless youth age 24 and under can dramatically reduce youth homelessness, inclusive of both minors and young adults as authorized under Title IV, Subtitle C, section 422 of the McKinney-Vento Act.

Proposed Bill Language:

Provided, that no less than \$33,000,000 of the funds appropriated under this heading shall be made available for Continuums of Care (CoC) as authorized by Title IV, Subtitle C, section 422 of the McKinney-Vento Homeless Assistance Act to implement projects to demonstrate how a comprehensive approach to serving homeless youth, age 24 and under, including minors, can dramatically reduce youth homelessness.

Transitional housing, emergency shelter, and other emergency solutions programs are integral parts to prevent trafficking among the homeless youth population because a lack of housing increases vulnerability and strengthens a young person's risk of becoming a victim of human trafficking. Currently, HUD has been deprioritizing housing and shelter programs with supportive

services in exchange for prioritizing other housing interventions that are largely not youth-appropriate or accessible to homeless youth. Having a stable place to live coupled with services that reconnect youth with education while also teaching life skills is necessary for youth to be able to fully support themselves when they become adults. Programs with a youth appropriate focus are the most effective way to prevent the human trafficking of youth experiencing homelessness. Without these programs and their resources available to youth, they are more likely to fall victim to trafficking.

Unaccompanied homeless youth need transitional housing and supportive services, which have been deprioritized by HUD. HUD should ensure that through its funding mechanisms it creates appropriate incentives for Continuums of Care to fund developmentally appropriate models for unaccompanied homeless youth.

2. HUD Homeless Assistance Grants: Screening Requirement

We are requesting a change to HUD policy that addresses the verification process, which determines eligibility to HUD homelessness assistance programs. Most youth experiencing homelessness do not become homeless because they receive an eviction notice from a landlord or lose their home to foreclosure. The vast majority of youth experience homelessness because they are fleeing domestic violence or sexual abuse; exit foster care with nowhere to go; or are pushed out of their home due to family rejection or poverty. Currently, McKinney Vento Homelessness Assistance Programs have regulations which require arduous third-party verification to “prove” homelessness that young people often cannot meet. Consistent with the language that was included in the FY 2016 Omnibus spending bill, we request that youth and youth parent families aged 24 and under are not required to provide third party document to establish their eligibility. Further, youth and young parent families living in unsafe situations may be serviced by programs funded with CoC funding.

Proposed Report Language:

Provided further, That youth aged 24 and under and families headed by youth age 24 and under shall not be required to provide third party documentation to establish their eligibility under 42 U.S.C.11320(a) or (b) to receive service; Provided further, That unaccompanied youth aged 24 and under or families headed by youth aged 24 and under who are living in unsafe situations may be served by any Continuums of Care (CoC) program as authorized by Title IV, Subtitle C, section 422 of the McKinney-Vento Homeless Assistance Act.

3. HUD Homeless Assistance Grants: Creating Youth-Appropriate Performance Measures

The performance and effectiveness of programs serving youth must be determined using outcome measures that are appropriate to the development stage and unique needs of youth and young parent families. Reallocating “low performing” projects to higher performing projects puts existing youth projects in danger of losing their funding based solely on evaluation criteria that is not appropriate to the demographic they are serving. Until youth-specific performance measures, created in collaboration with the U.S. Department of Health and Human Services, are used to evaluate the performance of CoC funded youth projects, youth projects should be excluded from reallocation due to low performance.

Proposed report language:

Provided further, That the Secretary will exclude youth programs from reallocating funds from lower performing projects to higher performing projects until youth-specific outcome measures are developed and implemented in collaboration with the U.S. Department of Health and Human Services: Provided further, That within one year of enactment of this law, the Secretary of Housing and Urban Development in collaboration with the Secretary of Health and Human Services will have established performance measures that are appropriate to youth, inclusive of both minors and 18 to 24 year olds.

4. HUD Homeless Assistance Grants: Eligibility Requirements

We request a change in eligibility for HUD homeless assistance programs. Many homeless families and youth are forced to stay in motels due to lack of alternative shelter or housing programs. These motels are often dangerous locations, known as hubs for trafficking and other forms of predation.

Under the current statute and regulations, if a government or charity agency pays for a motel room for a family or youth, the family or youth meets the definition of “homeless,” and qualifies for HUD homelessness assistance. However, if the family or youth pays for the room with their own funds, they do not meet the definition of “homeless,” and are not eligible for HUD homelessness assistance until they have only enough money for 14 days or less, no subsequent place to go, and no resources to obtain permanent housing. The risk for children and youth in motels is the same whether their motel room is paid for by an outside agency, or with their own dollars.

Proposed Report Language:

Provided further, That families and youth who are staying in motels due to lack of adequate alternative accommodations may be served by any Continuums of Care (CoC) program as authorized by Title IV, Subtitle C, section 422 of the McKinney-Vento Homeless Assistance Act, regardless of the source of payment for the motel room.

We understand the extremely difficult funding situation you are facing in FY 2017. We have collectively carefully vetted our requests to focus on the most important programs to fight human trafficking in the Housing and Urban Development Department. We thank you for your consideration of these requests and your continued leadership in fighting the scourge of human trafficking, forced labor, and modern slavery. If you have any questions, please contact Melysa Sperber, ATEST Director, at msperber@humanityunited.org or (631) 374-0749.

Sincerely,

Coalition to Abolish Slavery and Trafficking (CAST)

Coalition of Immokalee Workers (CIW)

ECPAT-USA

Free the Slaves

Futures Without Violence (FUTURES)

International Justice Mission

National Domestic Workers Alliance (NDWA)

National Network for Youth (NN4Y)

Polaris

Safe Horizon

Solidarity Center

Verité

Vital Voices Global Partnership

ATEST is a diverse alliance of U.S.-based human rights organizations, acting with a shared agenda to end all forms of modern-day slavery and human trafficking domestically and globally. ATEST member organizations include: Coalition to Abolish Slavery and Trafficking (CAST), Coalition of Immokalee Workers (CIW), ECPAT-USA, Free the Slaves, Futures Without Violence (FUTURES), International Justice Mission, National Domestic Workers Alliance (NDWA), National Network for Youth (NN4Y), Polaris, Safe Horizon, Solidarity Center, Verité, and Vital Voices Global Partnership.