

Are Runaway Youth Homeless?

June 1, 1992

MEMORANDUM FOR: Michael A. Smerconish, Regional Administrator-
Regional Housing Commissioner, 3S

FROM: Randall H. Erben, Acting Assistant Secretary for
Community Planning and Development, C

SUBJECT: Request for Determination of Runaway Youth as Homeless Persons

This is in response to your memorandum dated February 26, 1992, requesting a determination of whether runaway youth are considered homeless. The regulations identify homeless persons as one of the categories generally presumed to be low- and moderate-income.

The Borough of State College, Pennsylvania is providing CDBG funds to pay rent and utility costs of a runaway and homeless youth shelter. The Borough has classified the activity as a public service under Section 570.201(e) and contends that the activity benefits a limited clientele (runaways) that is generally presumed to be principally low- and moderate-income as described at Section 570.208(a)(2)(i)(A). Your office questions the extent to which these youth should be considered homeless given the fact that the youth run away from their parents for various reasons, and the average stay at the shelter is 11-12 days. Some of these youth are abused and others were thrown out of their homes by the parents, removed by welfare, or just ran away for their own reasons. Sixty-five percent of the youth return home and the remaining 35 percent go to live with relatives or are put in foster care or group homes.

The rent and utility payments to the shelter for runaway youth is an eligible public service activity. However, runaway youth would not always qualify as homeless, and therefore, do not meet the requirements for presumptive benefit. (While abused children are specifically covered by the presumed benefit criteria, not all runaway children are abused.) In order to meet the low/mod benefit national objective, the activity would have to meet the criteria established at Section 570.208(a)(2)(i) based on income. The community must document that the majority of the youth using the shelter are low and moderate income persons. Because these children have chosen to leave their family, each youth should be treated as an individual for the purpose of determining low/mod benefit. Whatever the reason for leaving the home, the runaway is no longer a part of the family unit while at the shelter and the income determination should be based on the income of the youth alone, using the one-person family limit.

If you need further information or clarification, please contact the Entitlement Communities Division at FTS 8-458-1577.

cc: Linda Marston, SC