Hello SWHC & CoC chairs,

Basically when we had our Family Youth Services Bureau (FYSB) site review in December we were told that if our next grant application for shelter funding included a “facility” that serves both juveniles under 18 and youth 18+ in the same facility that we would not get funded. We were also sighted as being out of compliance for having a shelter that does this now, even though it was in our grant application and allowed under the funding rules. When we pushed back on this issue we were referred to our regional director Keith Wallace who confirmed this and sent us a two documents he said supported their position. I responded by quoting the final rule that was posted to the national register (see attached word document, highlighted text) in 2016 that has a specific caveat for funded youth shelters that have state regulations and licensing requirements that allow for the broader age range. He did not respond. We were told by our site monitor that we should just open another shelter for 18-22 year olds and reduce the number of beds in our next RFP response. Both of which are financially untenable.

I have since contacted both Shaw House and Preble Street and we were all given the same message. If this happens either the three youth shelters stop serving 18-21 year olds and those youth will go to the adult shelters or find some other less savory way to get shelter or we stop serving youth under 18 or some other combination of those responses. Any of these options is untenable from my perspective. I would like to ask both the CoC and the SWHC to sign a letter in support of all the youth shelters in Maine to be allowed to continue operating in accordance with the final rule.

I have been in contact with Sen. Collins office, the National Network for Youth both of which are in strong support of our interpretation of the rules and possible negative consequences of the FYSB recommendation. I will also be reaching out to the Runaway and Homeless Youth Technical Assistance Center (RHYTTAC) to see what their stance is and if others have been seeing the same thing nationally. I have also begun preliminary conversations with Maine DHHS on this topic as well.

I believe that we should respond to FYSB and HHS as a state to this rather than as individual homeless youth providers and that we should focus on how this will disrupt the current shelter system in Maine as well as the harm it will cause to all youth who will be displaced as a result of such a change as well as the impact on already overburdened adult shelters.

Best,

Chris