The Case for the DOOR to Housing Act

Evidence, answers, and the record corrected

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Enfiaré Inc. is a California public-benefit nonprofit action tank working to make homelessness history (federal 501(c)(3) determination pending). This memorandum accompanies the discussion draft of the DOOR to Housing Act of 2026 and its model state companion. The framework it supports belongs to no organization. Every figure in this memorandum travels with its population and time frame, and every claim in the bill's findings is mapped to a source below. Where the evidence cuts against an easy claim, that is stated too — a case that survives scrutiny is worth more than a case that merely sounds strong.

I. The moment

On July 11, 2026, the 21st Century ROAD to Housing Act became Public Law 119-101 after passing the Senate 85 to 5 and the House 358 to 32 — the most significant housing supply legislation in a generation. It streamlines environmental review, modernizes manufactured housing, rewards localities that build, and restricts institutional investors from outbidding families for starter homes. It is, by its own terms, a supply and homeownership statute: it authorized no new funds, and its provisions touching homelessness are narrow.

Congress built the road. The DOOR to Housing Act opens the door — it is the demand-side, prevention-side completion of the same consensus, addressed to the 745,652 people who were homeless on a single night in January 2025 and to the far larger number of households one crisis away from joining them.

The moment argues for speed. The January 2025 count was the first national decrease since 2016, and the analysts who documented it also documented why: targeted, temporary resources that have since expired or been deprioritized. Finland, long the only EU country with consistently falling homelessness, saw its numbers rise in 2024 for the first time in more than a decade after supports were cut — up 20 percent by 2025. The lesson of both is the same and is the design principle of this Act: progress bought with temporary tools is temporary. Durable progress requires a durable statute that pays for results.

The public is ready. In battleground polling of 19,564 adults in June 2026, supermajorities of both parties supported federal housing action beyond the ROAD Act — including 74 percent of Republicans and 89 percent of Democrats for targeted rental assistance for vulnerable renters. In 2024 election polling, homelessness ranked among the top three concerns of voters in both parties. There is no constituency for the status quo.

II. What the Act does, in one page

Title I — Prevention. A Housing Stability Grant Program, run through existing administrative rails (no new agency), delivering fast, flexible, documented help —

arrears, deposits, one-time stabilization payments, problem-solving — before housing is lost. A 72-hour response standard. No family has to become homeless to qualify for help staying housed. Rural, Tribal, and territorial set-asides. Landlords paid directly and promptly.

Title II — Eviction off-ramps. Diversion and mediation before and at the courthouse; legal help for income-eligible tenants and for small landlords; a sudden-shock emergency fund adopting the architecture of the bipartisan Eviction Crisis Act. State landlord-tenant law is explicitly untouched.

Title III — No exit into homelessness. The federal government stops discharging people from its own custody and care to the street, and funds state and local partnerships so jails, hospitals, psychiatric facilities, and foster care do the same: screening, a housing plan, documents, benefits, and a warm handoff before release. A housing bridge for youth leaving foster care through age 26.

Title IV — Stabilization housing. Capital and operating support for housing the chronic, high-cost population — with a rule no federal statute has had before: model plurality. No service philosophy is mandated, preferred, or penalized; immediate-access and recovery-oriented programs compete on measured outcomes, and every community must maintain "no dead ends" — declining one program never means being left with nothing, and no funded program discharges a person to the street as punishment without an alternative offer. Recovery residences meeting quality standards are eligible providers.

Title V — Pay for results. Reauthorizes and expands the Social Impact Partnerships to Pay for Results Act (which otherwise sunsets in 2028) for housing stability outcomes. The federal government pays only for outcomes achieved and independently verified, capped at the value of the savings they produce; states may reinvest their verified savings into more prevention.

Title VI — Proof. Standard outcome measures published annually by grantee; HMIS modernization; a national dashboard; a 1 percent independent-evaluation set-aside with priority for randomized designs; GAO review at year three; privacy protections with teeth.

Title VII — Guardrails. No new agency. No individual entitlement or private right of action. No preemption of state landlord-tenant, zoning, or land-use law. No mandate on any state, locality, or court. Faith-based providers on equal footing. Authorization of $5.75 billion per year for five years — less than the estimated annual public cost of chronic homelessness alone — with sunset and reauthorization review against a public national goal: homelessness reduced 50 percent by the end of 2031; rare, brief, and nonrecurring.

III. The evidence behind every finding

Each numbered finding in Section 2 of the bill rests on the sources below.

Finding 1–2 (scale and trajectory). HUD 2025 Annual Homeless Assessment Report, Part 1 (released May 29, 2026): 745,652 people on a single night in January 2025, the first decrease since 2016 (roughly −3.3 percent from the record

771,480 in January 2024), still about 28 percent above January 2020 (Harvard Joint Center for Housing Studies). The National Alliance to End Homelessness and others attribute the decline substantially to temporary targeted resources, including the Emergency Housing Voucher program, since deprioritized.

Finding 3 (mortality). Meyer et al., National Bureau of Economic Research (w31843), the first national mortality accounting for the U.S. homeless population (~140,000 people tracked 2010–2022): age-adjusted mortality approximately 3.5 times housed individuals; a 40-year-old experiencing homelessness faces mortality risk comparable to a housed person nearly 20 years older.

Finding 4 (rents drive homelessness). GAO-20-433 (2020): each $100 increase in median rent associated with approximately a 9 percent increase in the homelessness rate. Consistent with the research literature finding that rents and vacancy rates — not local rates of poverty, mental illness, or addiction — best explain why homelessness varies so sharply between cities.

Finding 5 (the shortage). NLIHC, *The Gap* (March 2026): shortage of 7.1 million affordable and available rental homes for extremely low-income renters; 35 affordable and available homes per 100 extremely low-income renter households nationally (worst: Nevada, 17; best: North Dakota, 62); about 87 percent of ELI renters cost-burdened and 75 percent severely cost-burdened.

Finding 6 (wages vs. rents). NLIHC, *Out of Reach* (2025): national two-bedroom housing wage $33.63 per hour, more than four times the federal minimum wage of $7.25; a full-time minimum-wage worker cannot afford a modest rental at fair market rent in any state.

Finding 7 (evictions and interceptable crises). Eviction Lab, Princeton University: approximately 3.6 million eviction cases filed in 2018, a typical pre-pandemic year.

Finding 8 (prevention works). Three independent bodies of evidence: (a) Evans, Sullivan & Wallskog, *Science* (August 12, 2016), a quasi-experimental evaluation of Chicago's Homelessness Prevention Call Center (n≈4,500) exploiting effectively random variation in the availability of funds: households receiving one-time emergency financial assistance were 76 percent less likely to enter shelter within six months, with effects persisting at one year. (b) New York City Office of Civil Justice: 84 percent of tenants represented under the city's right-to-counsel program remained in their homes (2018, 2019, 2023 reports); representation rose from about 1 percent of tenants in 2013 to more than 60 percent by 2022; filings fell roughly by half from 2013 to 2024. (c) HUD's Family Options Study (3-year results): families offered priority rental assistance were less than half as likely as usual-care families to spend a night in shelter in the prior year or be doubled up in the prior six months (38 percent of control families experienced these outcomes); intimate partner violence fell by one-third; child food insecurity fell by 20 percent; and the voucher arm outperformed transitional housing on cost-effectiveness.

Finding 9 (the discharge pipeline). Prison Policy Initiative, *Nowhere to Go*: formerly incarcerated people are almost 10 times more likely to be homeless than the general public (203 per 10,000). KIDS COUNT / Annie E. Casey Foundation:

one in four youth in foster care at age 17 report homelessness within the past two years when surveyed at 21; recent studies place homelessness among aging-out youth at 22–30 percent during the transition to adulthood; Chapin Hall's Voices of Youth Count: 29 percent of youth experiencing homelessness report foster care history.

Finding 10 (domestic violence). Administration for Children and Families and National Network to End Domestic Violence fact sheets: domestic violence is a leading cause of homelessness for women and families; more than 80 percent of homeless mothers with children have experienced domestic violence. The Family Options result — rental assistance reduced intimate partner violence by a third — shows housing stability is itself protection.

Finding 11 (the cost of chronic homelessness, honestly scoped). National Alliance to End Homelessness: average public cost of chronic homelessness approximately $35,578 per person per year (a durable order-of-magnitude figure, tracing to about 2016), with supportive placement reducing public costs by about 49.5 percent on average. A 2021 Los Angeles cost comparison: $38,146 per year for unaddressed chronic homelessness and $39,870 for incarceration, versus $12,800 for shelter and $15,358 for permanent supportive housing. Denver's Housing to Health initiative — funded under the federal Pay for Results law and independently evaluated by the Urban Institute — produced verified public savings of $15,733 per person per year. Scope discipline: these savings concentrate in the chronic, high-utilizer population. The most rigorous randomized trial found reductions in psychiatric emergency visits and shelter use but not in total emergency or inpatient use; a New York Medicaid study found savings of about $9,526 over two years concentrated among the highest-cost group. That is why Title IV targets high utilizers, and why Title V pays only on independently verified savings: the Act's fiscal claims are built to survive an honest audit because they are scoped the way honest audits come out.

Finding 12 (veterans prove it is possible). HUD AHAR: veteran homelessness down more than half since 2010, to 32,495 in January 2025 — the lowest recorded — through HUD-VASH, SSVF, and sustained bipartisan appropriations. Community Solutions' Built for Zero: more than a dozen communities have reached certified functional zero for veteran homelessness.

Finding 13 (pay-for-results precedent). The Social Impact Partnerships to Pay for Results Act (Bipartisan Budget Act, February 2018): $100 million Treasury fund paying only for independently verified outcomes, capped at federal value over up to ten years; Denver's project ($5.5 million project grant, ~$827,000 evaluator grant) is the working homelessness precedent; the fund sunsets in early 2028 absent reauthorization — a clean bipartisan vehicle awaiting exactly this expansion.

Finding 14 (the ROAD Act's gap). Public Law 119-101 (July 11, 2026; Senate 85–5, House 358–32): supply-side reform with a "no additional funds" design; its homelessness-touching provisions are limited (an Emergency Solutions Grant shelter-cap waiver, USICH reporting and testimony, a HUD-VASH income-eligibility fix for disabled veterans, voucher inspection streamlining, a workrequirements study). The unfinished half is the subject of the DOOR Act — and USICH's own next federal strategic plan is being built with prevention as a named pillar, so the Act assigns duties to the council that already exists rather than creating a new one.

Finding 15 (the post-Grants Pass reality). City of Grants Pass v. Johnson, 603 U.S. ___ (June 28, 2024, 6–3): the Eighth Amendment does not bar enforcement of generally applicable public-camping ordinances. Two years on, 14 states and roughly 350 cities have adopted stricter street-homelessness laws (Stateline, June 2026). The Act takes no side in local enforcement debates and touches no local authority; it observes only what every sheriff and mayor knows — enforcement does not house anyone. Prevention shrinks the problem that enforcement is asked to manage.

Finding 16 (the mandate). University of Maryland Program for Public Consultation (May 27–June 25, 2026; n=19,564 across 11 battleground states and 28 districts): rental assistance for vulnerable renters supported by 89 percent of Democrats and 74 percent of Republicans; every tested housing measure beyond the ROAD Act drew bipartisan majorities. National Alliance to End Homelessness / Morning Consult (September 2024): homelessness a top-three issue across parties; 65–67 percent of voters say a candidate's stance on homelessness affects their vote.

IV. The math

The Act authorizes $5.75 billion per year for five years. What does the status quo cost?

Chronic homelessness alone: 155,750 people (January 2025, a record) × approximately $35,578 in annual public cost ≈ **$5.5 billion per year** — spent on emergency rooms, jails, ambulances, and shelters, purchasing no durable exit for anyone. That single line item, transparently computed from sourced figures, is roughly the entire annual authorization of this Act, and it excludes the costs of family homelessness, eviction churn in the courts, shelter systems (roughly $12,800 per person per year in the Los Angeles comparison), lost workforce participation, and the McKinney-Vento obligations of school districts.

Against that baseline, the Act's economics are conservative by construction. Prevention is the cheapest dollar in the system: one-time assistance on the order of a few thousand dollars, with a 76 percent reduction in shelter entry among those at imminent risk, against shelter at five figures per person per year and chronic homelessness at $35,000. Title V goes further and removes the fiscal argument entirely for the expansion tier: payment occurs only after an independent evaluator verifies the outcome, and is capped at the value of the savings. Denver already proved the mechanism: $15,733 in verified annual savings per person housed.

Two honest caveats, stated because they are true and because stating them is what makes the rest credible. First, prevention assistance inevitably reaches some households that would have avoided homelessness anyway; the targeting literature is improving but not perfect. The arithmetic tolerates this: at the observed cost asymmetry, prevention remains favorable even if a substantial share of recipients would have muddled through — and Title VI's evaluation set-aside exists to tighten targeting continuously. Second, supportive housing does not zero out every public cost, and this memorandum makes no such claim; the verified claim is a roughly one-half average reduction in public costs for the chronic population, concentrated in the crisis systems housing most directly displaces.

V. Objections, taken seriously and answered

1. "We cannot afford a new $5.75 billion program." The public is already paying more than this — involuntarily, through emergency rooms, jail beds, court dockets, and shelters, at roughly $5.5 billion per year for the chronic population alone, with nothing durable to show for it. The Act converts an open-ended implicit appropriation into a capped, sunset-limited, audited explicit one, and its expansion tier (Title V) spends only verified savings. The question is not whether to spend; the public is spending now. The question is whether to buy failure or results.

2. "Prevention money is deadweight — most recipients would not have become homeless anyway." This is the strongest technical objection, and the Act is built around it. The Chicago evaluation answers it directly: among households at imminent risk, assistance produced a 76 percent reduction in shelter entry — that is a measured net effect against a valid comparison group, not a hopeful before-and-after. Section 104 requires validated risk targeting; Section 603 funds continuous randomized evaluation to tighten it; and the cost asymmetry (thousands once, versus $12,800–$35,578 per year) means the arithmetic holds even with imperfect targeting.

3. "This creates dependency." The Act's default instruments are one-time or short-term (24-month cap in Title I), paired with employment services, with independence outcomes — employment and income at exit — measured and published under Section 502. It mandates no work requirement for emergency housing help for the same reason no fire department checks employment before extinguishing a fire; but it measures what happens after the fire is out, and funds what works. The actual dependency machine is the status quo: shelter systems and street homelessness, from which exit rates are low and public costs are permanent.

4. "Housing First failed; this is more of the same." This Act is not a Housing First mandate — it is the first federal homelessness statute to make model neutrality the law (Section 403). No philosophy is mandated, preferred, or penalized; recovery residences are expressly eligible; treatment-oriented and immediate-access programs compete on published outcomes. Whatever one's reading of the last decade — and the honest reading is that some systems underperformed while specific tools (HUD-VASH, targeted prevention) demonstrably worked — the remedy is the same: measure outcomes, fund what delivers them. Both the critic and the defender of any given model should welcome a law that finally makes the argument empirical.

5. "Homelessness is really about mental illness and addiction, not housing." Both things are true, and the Act funds both. At the individual level, behavioral health conditions are common among — though not a majority of —

people experiencing homelessness, and they are heavily concentrated in the chronic population that Titles III and IV target with treatment-inclusive tools. But illness rates do not explain why homelessness is many times higher in some states than in others with similar or higher rates of illness and addiction; housing costs do (GAO's 9-percent-per-$100 finding). A person in crisis in a tight market ends up on the street; the same person in a loose market ends up housed, with the same diagnosis. The Act therefore does not choose between treatment and housing; it funds the discharge handoff, the recovery residence, the stabilization unit, and the prevention payment, and lets measured outcomes allocate among them.

6. "This is federal overreach into local matters." Every program in the Act is a voluntary grant. Nothing preempts state landlord-tenant law, zoning, or land use (Sections 204, 702). Nothing conditions unrelated funds on participation. Nothing limits local enforcement authority, and the Act expresses no view on it beyond the observable fact that enforcement does not house people. The only entities the Act commands are federal: the Bureau of Prisons and its federal peers, which will no longer discharge people to the street — a federalism-perfect application of the principle that the federal government should first govern itself.

7. "It will be defrauded like the pandemic programs." The Act legislates the lessons of the Emergency Rental Assistance experience by name (Section 104): documentation proportionate to assistance, direct-to-landlord payment as the default cure, audits, annual improper-payment reporting, Inspector General referral, and a GAO review at year three. Speed and integrity are both engineered in, because a prevention program that is slow is not a prevention program, and one that is leaky does not survive reauthorization.

8. "Landlords lose under this bill." Landlords are among its largest beneficiaries, which is why the design treats them as partners: arrears cured with direct payment within 30 days; a mitigation reserve covering damages beyond deposits; mediation that resolves cases without litigation costs; legal assistance for small landlords in Title II; and explicit preservation of every lawful right (Sections 105, 204). A prevented eviction is a paid landlord, an intact tenancy, and an empty court date.

9. "Why federal? Let states handle it." States cannot reauthorize SIPPRA, command the Bureau of Prisons, or stabilize a national count that moves with interstate labor and housing markets. The federal role here is narrow and appropriate — money, measurement, and its own institutions — while the model state act carries everything that is properly state law. The two are designed to interlock, not to compete.

10. "The counts are unreliable, so success cannot be measured." Partly true today — GAO itself found the point-in-time count likely undercounts — and that is an argument for the Act, which funds by-name data capability, HMIS modernization, and a public dashboard (Section 602), and defines success in auditable terms (functional zero certification; retention at 12 and 24 months; verified savings). You cannot manage what you do not measure; Title VI is how the nation starts measuring.

11. "This creates a right to housing and endless entitlement." The text forecloses it three times: no individual entitlement (Section 3(c)), no private right of action (Section 702(1)), discretionary appropriated grants with a sunset (Section 705). The Act is a results program, not a rights program.

12. "Nothing works; the problem only grows." The record says otherwise, specifically: veteran homelessness cut by more than half nationally; a dozen-plus communities at certified functional zero; the first national decrease in nearly a decade in 2025; New York's eviction filings halved; Chicago's shelter entries cut three-quarters among assisted at-risk households; Denver's verified savings. Each is a bounded, sourced, replicated-or-replicable result. The DOOR Act is those results, written into general law.

VI. Who benefits

Renters and working families get help that arrives before the truck does, once, fast, with dignity. Landlords — especially small ones — get paid, keep tenancies intact, and gain a mitigation backstop. Taxpayers get a capped, audited, sunset-limited program priced below the failure it replaces, with an expansion tier that spends only verified savings. Police, sheriffs, and courts get fewer crisis calls, smaller dockets, and a smaller street population to manage — by prevention rather than by ordinance. Hospitals get fewer uncompensated emergency visits from the highest-utilizer population. Employers get workforce stability in the labor force that turnover hits hardest. Schools get fewer students churning through McKinney-Vento instability. Veterans get the completion of a strategy already proven on their behalf. Young people leaving foster care get a bridge instead of a cliff. People in recovery get certified recovery housing as a funded, respected choice. People experiencing homelessness get what the evidence says works and what dignity requires: a door, and the agency to walk through it. And both parties get the second half of a consensus they have already voted for once, 85 to 5 and 358 to 32.

VII. The record corrected

This package was built by checking every claim in the prior drafts and research memoranda against primary sources in July 2026. Material corrections, so no legislator, staffer, or reporter is ever handed a number this coalition cannot defend:

1. **Martin v. Boise is no longer good law.** Prior drafts treated it as controlling. City of Grants Pass v. Johnson (June 28, 2024) superseded it; the legal analysis and the bill's posture were rebuilt accordingly. 2. **"37 affordable homes per 100 very low-income renters"** mis-stated both number and population. Current, correctly scoped figure: 35 per 100 *extremely* low-income renter households; 7.1 million-home shortage (NLIHC Gap, 2026). 3. **"86 hours a week at minimum wage for a one-bedroom"** was years stale. Replaced with Out of Reach 2025: $33.63 two-bedroom housing wage, more than four times the federal minimum. 4. **"Vouchers reduced families in shelters or on the street by 75 percent"** overstated the Family Options finding. Corrected to the study's three-year results: less than half

as likely (38 percent of control families experienced shelter stays or doubling up), domestic violence down by a third. 5. **Kansas City right-to-counsel figures** appeared in two mutually inconsistent versions. Replaced with New York City's audited results (84 percent of represented tenants remained housed). 6. **Finland's "68 percent reduction, 2008–2022"** required updating: the long decline reversed in 2024–2025 (total 4,579; long-term 1,306; +20 percent year over year) after supports were cut. The corrected lesson strengthens the bill: durability requires statute, not discretion. 7. **The supportive-housing "benefit-cost ratio of 1.8"** was internally inconsistent with its own cited figures. Replaced with scoped, sourced economics: ~49.5 percent average public-cost reduction for the chronic population; $15,733 per person per year verified in Denver; honest randomized-trial counterweights stated in Section III. 8. **The 2022-vintage cost model ($9.6 billion / 882,000 sheltered households)** conflicted internally with its own executive summary ("1.05 million") and is superseded by 2025 AHAR-based sizing. 9. **"Ireland's Housing Act 2022"** does not exist as described; Ireland's framework is the *Housing for All* plan (2021). Removed. 10. **Hurricane Michael's "20,000 homeless in Bay County"** could not be verified this pass; replaced with the general, well-documented disaster-displacement driver. 11. **"$3–7 billion annual healthcare and criminal-justice cost"** was unsourced; replaced with transparent per-person arithmetic (Section IV). 12. **The prior draft's Section 9 created a new Federal Interagency Council on Homelessness Prevention** — duplicating the USICH, which already exists in statute (42 U.S.C. 11311) and which the ROAD Act just strengthened. The DOOR Act assigns duties to the existing council and creates no new body. 13. **"Such sums as may be necessary"** was replaced with specific, scoreable authorization levels, which appropriators and CBO require to take a bill seriously. 14. **ROAD Act internal title numbers** conflict between secondary sources; all references now describe provisions rather than citing title numbers. 15. All 2022-era counts were superseded by the 2025 AHAR (745,652; chronic 155,750; veterans 32,495).

Principal sources

HUD, 2025 Annual Homeless Assessment Report, Part 1 (May 2026) · HUD, Family Options Study, 3-Year Impacts · GAO-20-433 (2020) · NLIHC, The Gap (2026) and Out of Reach (2025) · Evans, Sullivan & Wallskog, "The impact of homelessness prevention programs on homelessness," Science 353:694 (2016) · NYC Office of Civil Justice annual reports; Civil Right to Counsel resource compilations · Meyer et al., NBER Working Paper 31843 · Prison Policy Initiative, Nowhere to Go · Annie E. Casey Foundation / KIDS COUNT; Chapin Hall, Voices of Youth Count · ACF and NNEDV domestic violence and homelessness fact sheets · National Alliance to End Homelessness, cost-of-chronic-homelessness materials · Urban Institute, Denver Supportive Housing Social Impact Bond evaluation; U.S. Treasury, SIPPRA · Eviction Lab, Princeton University · Community Solutions, Built for Zero · City of Grants Pass v. Johnson, 603 U.S. ___ (2024) · Stateline (June 2026) on post-Grants Pass legislation · Public Law 119-101 (2026) · Executive Order 14321 (July 24, 2025) · University of Maryland Program for Public Consultation (2026) · NAEH/Morning Consult (2024) · Consolidated Appropriations Act, 2026 (CoC renewal directives) · Y-Foundation, Homelessness in Finland.