



**Comments of the National Association for the Education of Homeless Children and Youth
Submitted to the U.S. Interagency Council on Homelessness
Federal Strategic Plan
Families With Children Workgroup**

Summary of Recommendations

- The Federal Strategic Plan to End Homelessness (FSP) must be driven by reforms to, and expansion of, federal mainstream anti-poverty programs.
- The FSP must give equal value and attention to the full range of federal definitions of homelessness.
- The FSP should synthesize, and be based upon, existing data from all federal programs.
- The strong correlation between homelessness in childhood and homelessness in adulthood must not be ignored; therefore, the FSP should include a mandatory review of all homeless programs through a child and youth development lens, to ensure that all federal policies and programmatic elements are supporting the healthy development of children and youth of all ages.
- The Families with Children workgroup should consider organizing its work in such a way that children and youth's needs are addressed explicitly – and, where appropriate and necessary, distinguished from the needs of parents.
- The FSP should prioritize access to education, stability in education, and supports for academic success as key components of homelessness prevention for all children and youth experiencing homelessness. At every stage of homeless service delivery – from identification to emergency housing to permanent housing – connections to public schools and early childhood education programs must be initiated, supported, strengthened, and sustained.
- The FSP should incorporate the principles of the education subtitle of the McKinney-Vento Act into all programs serving homeless families, including child care, housing, health care, and employment.
- The FSP should incorporate and emphasize the unique ability of public schools and early care programs to identify families in need of assistance.
- The federal government should mandate accountability for homelessness within mainstream anti-poverty programs.
- The federal government should adequately enforce and support existing effective homeless policies and programs.

A more in-depth discussion of these recommendations is provided below.

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NAEHCY is a national grassroots membership association serving as the voice and the social conscience for the education of children and youth in homeless situations. Our members work in public schools, state departments of education, and community organizations to ensure the school enrollment and attendance, and overall success for children and youth whose lives have been disrupted by the lack of safe, permanent and adequate housing. We are pleased to offer our insights on family homelessness to the family workgroup as part of federal strategic planning to end homelessness (FSP).

Strategies for Preventing and Ending Homelessness Among Families with Children

1. Address the Systemic Underlying Causes of Homelessness

The Federal Strategic Plan (FSP) must be tied closely to, and implemented in conjunction with, a broader plan to address poverty in the United States. Homelessness represents a failure of multiple federal policies: housing, incomes, health care, education, and child welfare. Yet much of the federal response to homelessness over the past decade has been characterized by a separation of homelessness from the larger issues of poverty that underlie it. The most proactive Continuum of Care is powerless to affect national macro-economic issues, such as the unemployment and foreclosure crises that are driving families from their homes; the most progressive state housing trust fund cannot make up for the lack of federal investment in affordable housing. The FSP must be driven by reforms to, and expansion of, federal mainstream anti-poverty programs; it must be grounded in the understanding that targeted homeless assistance programs cannot, by themselves, prevent or end homelessness.

2. Include All Federal Definitions of Homelessness

In order to be effective, the FSP must be clear upon its terms, especially the nature of the condition that it aims to prevent and eradicate. To this end, the FSP must be inclusive of all federal definitions of homelessness. Currently, different federal agencies, and even different programs within federal agencies, employ various definitions of homelessness. Some of these definitions are statutory, while others are contained in regulation or guidance. The FSP must give equal value and attention to the full range of federal definitions of homelessness, without characterizing one definition as more appropriate or urgent (i.e. without diminishing the homelessness of families who are living temporarily with others in doubled-up situations, or in motels, by categorizing them as “at risk” of homelessness).

The HUD Continuum of Care has become the vehicle for most community planning on homelessness; therefore, most community and state plans to end homelessness are based upon the HUD definition. However, while the HUD Homeless Assistance Program is the largest of the

targeted federal homeless programs, its regulations do not govern the largest public systems that are mandated by law to service to homeless families with children. The definition of homelessness included in the education subtitle of the McKinney-Vento Act governs more than 15,000 school districts nationwide, each of whom is legally obligated to serve homeless families with children. This education definition is shared not only by special education and higher education within ED, but also by HHS through Head Start; by USDA through Child Nutrition programs; and by DOJ through Violence Against Women Act programs. The fact that these programs are targeted to families with children makes the inclusion of their definitions in the FSP even more essential.

In sum, since the FSP is a plan for the entire federal government, and not any one particular agency, it must address the needs of all families defined as homeless by all federal programs.

3. Include All Federal Agency Data

Similarly, in order to measure the effectiveness of the FSP, data from all federal programs must be gathered, compiled, and analyzed. In the past, HUD's Annual Homeless Assessment Report has been used by the USICH to illustrate the prevalence of homelessness in the United States. Yet HUD's homeless data exclude people who are unable to access federally-funded shelter. All federal data systems have limitations, and all stand to be improved. These limitations should be analyzed in the FSP, along with strategies for improvement. Simultaneously, the FSP should synthesize, and be based upon, existing data from all federal programs – programs that are targeted to homelessness, and mainstream programs that serve homeless families. Head Start programs, for example, are required to report data on the number of homeless children and families served. A compilation of all federal data on homeless families would be very helpful in identifying continued barriers to accessing mainstream programs, as well as trends in program participation. The FSP should be updated annually to reflect changes in all agency data.

4. Provide a Specific, Intentional Focus on Children and Youth

The 1996 National Survey of Homeless Assistance Providers and Clients (NSHAPC) found that homeless adults reported many significant adverse childhood experiences. Twenty-seven percent of homeless adults were placed in foster care, 29 percent reported abuse or neglect in childhood from someone in their household, 33 percent ran away from home, 22 percent were forced to leave home for at least 24 hours before they reached age 18, and 21 percent reported that their first period of homelessness predated their 18th birthday. While the causes of homelessness are complex, this strong correlation between homelessness in childhood and homelessness in adulthood must not be ignored. Similarly, research on stress, the brain, and the development of young children points to a simple but poignant fact: what happens to people when they are children affects their health and self-sufficiency as adults - powerfully, and sometimes irreversibly.

Yet, despite the vulnerabilities associated with their unique state of human development, policies and programs for homeless families often overlook children and youth's needs, focusing exclusively on the needs of adult parents. While the well-being of parents is essential to the well-being of children, children and youth's needs require dedicated attention, intentional planning,

and targeted resources. Thus, the FSP should include a mandatory review of all homeless programs through a child and youth development lens, to ensure that all federal policies and programmatic elements are supporting the healthy development of children and youth of all ages. For example, policies and programs should be reviewed to assess the extent to which they cause or exacerbate mobility and the physical and mental health consequences of homelessness, and should be revised to emphasize stability as a critical component of child and youth development.

NAEHCY encourages the Families with Children workgroup to consider organizing its work in such a way that children and youth's needs are addressed explicitly – and, where appropriate and necessary, distinguished from the needs of parents.

5. Invest in and Connect to Early Care and Education

Particularly in our modern economy, a quality education is essential to obtaining well-paying employment, and avoiding poverty and homelessness as an adult. The FSP should prioritize access to education, stability in education, and supports for academic success as key components of homelessness prevention for all children and youth experiencing homelessness. Therefore, at every stage of homeless service delivery – from identification to emergency housing to permanent housing – connections to public schools and early childhood education programs must be initiated, supported, strengthened, and sustained.

Practically, these connections may take many forms, including: 1) training staff at any program serving low-income families of the education definition of homelessness so that parents can exercise their federal rights; 2) informing parents of their children's right to an education at intake at any targeted homeless program; 3) facilitating and encouraging parents' involvement in their children's education while they reside in shelter or transitional housing by providing space, time, and expectations; 4) designing programs that support the physical, social, and emotional needs of all children and youth, including infants and toddlers, as well as adolescents; 5) ensuring that young children receive developmental screenings and assessments; and 6) developing partnerships with after-school programs and creating environments in homeless programs that are conducive to doing homework and studying. Recent amendments to the HEARTH Act require that Continuums of Care designate a staff person to ensure access to education and early care, and that they collaborate with school districts to identify and serve homeless children. These amendments, if adequately supported and enforced by HUD, offer potential for improvements in connecting homeless services to early care and education.

Within the population of children and youth experiencing homelessness, young children face unique challenges that merit specific strategies. The early care and education landscape is fragmented; there is no universal or mandatory early care system, and those programs that do exist are operated by different agencies with different regulations. Lack of capacity combined with the mobility of homeless families too often puts early care and intervention out of reach. The FSP should include specific strategies concerning child care, Head Start and Early Head Start, early intervention (IDEA Part C) services, and other early childhood and pre-kindergarten programs.

6. Utilize the Unique Ability of Public Schools and Early Care Systems to Identify Homeless Families with Children

While there is not housing for all who need it, nor emergency shelter beds for all who need them, there is a federally-mandated seat in the classroom for every school-age child and youth experiencing homelessness. The universal and compulsory nature of public education makes schools a vital part of any effort to end homelessness – indeed, it is not exaggerating to say that schools are the nation’s largest homeless service provider. Public schools see homeless families and youth who are unable to obtain shelter due to lack of capacity or eligibility restrictions; they see families and youth who do not seek services through the traditional homeless service delivery system due to shame, fear, and stigma; they see families and youth on the brink of losing their housing. Public schools are thus uniquely poised to identify families in need of assistance, as are early childhood programs such as Head Start, which serve nearly all communities.

These abilities should be incorporated and emphasized in the FSP through activities ranging from expediting and streamlining referral processes between public schools and early childhood programs and community homeless service providers, to sharing the operation of housing programs (see NAEHCY’s recent youth housing report, <http://www.naehcy.org/housingyouth.html>, as well as the recent article on San Diego’s HPRP model, http://www.naehcy.org/dl/beam/fall_09.pdf.)

Best Practices, and Barriers to Best Practices

In general, best practices in preventing and ending family homelessness are those that are flexible enough to meet the unique needs of individual families; provide an array of services, in addition to housing; prioritize child and youth well-being through close connections to early care, health, and educational systems; support the family as a unit; and create as “normal” and stable an environment as possible.

Within school systems, best practices to address family homelessness include: close collaborative relationships with community agencies, including housing, health, employment, and social services; widespread, regular, and comprehensive staff development on homelessness and federal educational rights, so that all school staff are informed and able to assist in identification and services; revision of school district policies to align with the federal policies of the McKinney-Vento Act; inclusion of homeless families in school-wide needs assessments; and dedicated resources to identify, enroll, and support the academic success of children and youth, including appropriate staffing.

Barriers to best practices include: rigid, arbitrary policies and rules that ignore the complexity of individual families’ needs; concerns about data sharing among programs; failure to comprehend the unique developmental needs of children and youth; and lack of federal funding.

NAEHCY would be pleased to provide specific local examples that illustrate these best practices, should the federal workgroup on families with children be interested in reviewing them.

Federal Government Effectiveness in Preventing and Ending Homelessness

The education subtitle of the McKinney-Vento Act represents effective federal policy that should be replicated across federal programs and agencies. It is effective for many reasons. The Act mandates immediate access to one of the largest “mainstream” anti-poverty programs in our nation: public education. It is holistic; it is premised upon the understanding that in order to be able to participate in an educational program, comprehensive basic needs must be met. Hence, the Act mandates collaboration across agencies. The education subtitle of the McKinney-Vento Act is also effective because it recognizes that homelessness is everywhere, in communities of all sizes and all income levels; it therefore requires the designation of a homeless liaison in every district, and charges liaisons with identifying and serving homeless families. The Act’s broad definition of homelessness acknowledges the reality of family homelessness, including those who are not able to access emergency shelter. Finally, the Act is predicated upon one of the most fundamental developmental needs of children and youth: the need for stability. Thus, under the Act, children and youth whose lives are disrupted by loss of housing have a federal right to keep the same school if it is in their best interest. School can be an oasis of stability in the midst of family upheaval.

Over the past few years, the concepts embedded in the education subtitle of the McKinney-Vento Act – expedited access, stability, collaborations for comprehensive services, and broad eligibility – have been woven into other federal statutes. These statutes include Head Start, IDEA, Special Education, Child Nutrition, Higher Education (financial aid and college access) and Title IV-E of the Social Security Act (child welfare law). The Child Nutrition Act amendments have been particularly effective, ensuring prompt provision of school meals to homeless children and youth and close coordination with school district homeless liaisons. Consistently, the U. S. Department of Agriculture has issued broad, progressive, and helpful guidance on the implementation of this policy, most recently in response to the influx of Haitian refugees.

The FSP should incorporate the principles of the education subtitle of the McKinney-Vento Act outlined above into all programs serving homeless families, including child care, housing, health care, and employment.

Suggestions for How the Federal Government Could Improve its Effectiveness

1. Expand Anti-Poverty Programs and Increase Accountability for Homelessness Within Mainstream Programs

As noted earlier, homelessness represents a failure of multiple federal policies resulting largely from a lack of political and public will to combat poverty. The federal government should expand programs that address the root causes of homelessness, i.e., those programs that provide affordable housing, liveable incomes, adequate health care, and quality early care and education.

In addition, the federal government should mandate accountability for homelessness within mainstream anti-poverty programs. For example, homeless families face barriers to child care not simply because the Child Care and Development Block Grant (CCDBG) is not adequately funded to meet the needs of all eligible families, but also due to state-imposed records requirements that may be difficult or impossible for homeless families to meet. Federal policy should set minimum standards for state policy; for example, requiring that homeless families be prioritized for child care through CCDBG. Where necessary, federal policy should overrule state policies that act as barriers to accessing mainstream programs.

Finally, Head Start is a critical anti-poverty program with tremendous potential to prevent and end family homelessness and improve life-long outcomes for parents and children. This year, the Office of Head Start will issue regulations on homeless children and families' access to Head Start. These regulations are an opportunity to increase accountability for homelessness within a large mainstream anti-poverty program. The Head Start regulations should address conflicting policies within the Head Start performance standards that act as disincentives to serve homeless families, such as the conflict between full enrollment and prioritizing homeless children, state child care licensing rules that conflict with expedited enrollment, concerns about attendance, and other well-documented barriers to access and participation.

2. Adequately Enforce and Support Existing Effective Homeless Policies and Programs

While the education subtitle of the McKinney-Vento Act represents enlightened and effective federal policy for homeless families, it has not been enforced adequately at the federal level, nor has the U.S. Department of Education given it appropriate support, visibility, or resources. States and school districts continue to violate the law without consequence; indeed, some violations occur because both state departments of education and local school districts know that there is no consequence from the U.S. Department of Education. The federal government must enforce these policies if they are to benefit the children, youth, and families for whom they were intended.

In addition, the McKinney-Vento Act education program is woefully under-resourced and has not been given the visibility and prominence it merits within both the Department of Education and within other federal agencies. The lack of support for this program is even more egregious in the face of one of the worst economic crises our nation has faced: at the end of the 2008-2009 school year, public schools enrolled over one million homeless children and youth – a 47 percent increase since the 2006-2007 school year. Yet the only two targeted homeless programs for which the Obama Administration did not propose an increase in the FY2011 budget were the Education for Homeless Children and Youth program, and the Runaway and Homeless Youth Act program. This is a sad statement of priorities.

Homeless children and youth require additional supports and strategies if they are to be able to participate in any educational program, yet the McKinney-Vento education program's role as a "door opener" to other federal education programs has been overlooked. Indeed, the most promising instructional strategy or academic program will be of little benefit to children and youth who have not been identified, cannot get to school, or who are constantly changing schools

due to the instability of their homeless situation. If Obama Administration education priorities, such as investing in early learning programs and increasing high school graduation rates, are to reach the nation's poorest children and youth, they must take into account the often insurmountable barriers of access and participation faced by children and youth whose families are homeless.

3. Restructure HUD Homeless Programs to Meet the Needs of All Homeless Families

A comprehensive strategy to end family homelessness must acknowledge the full range of needs of all families experiencing homelessness. The Homelessness Prevention and Rapid Rehousing program (HPRP) is an effective approach for many families. Yet it is narrowly targeted to families who will not need additional government assistance after they receive HPRP aid. HUD should consider offering a rapid rehousing program (like HPRP) designed for families with more complex needs; this program should include dollars for the support services that are needed to keep those families stable. Flexible assistance must be provided to communities in a way that allows local homeless service providers to most effectively and efficiently serve all families experiencing homelessness.