



November 9, 2020

Administration of Children and Families
Office of Planning, Research, and Evaluation
330 C Street SW
Washington DC 20201
Attn: ACF Reports Clearance Officer
Via email: infocollection@acf.hhs.gov

To Whom It May Concern:

Thank you for the opportunity to provide comments on the “Proposed Information Collection Activity; Child Care and Development Fund Plan for States/Territories for FFY 2022-2024.”

SchoolHouse Connection is a national organization working to overcome homelessness through education, from birth through postsecondary education. Our network is composed of early childhood programs, homeless service providers, school district homeless liaisons, state agencies, and parents and youth experiencing homelessness. We have extensive experience helping communities and states implement federal and state laws and regulations.

Prior to the pandemic, public schools identified and enrolled 1.5 million children and youth experiencing homelessness in 2017-2018 – the highest number on record.¹ The U.S. Department of Education estimated that another 1.4 million children under age six - infants, toddlers, and preschoolers -- experienced homelessness.² These numbers are likely much higher now as a result of the economic downturn and family stress resulting from the pandemic, and are likely to remain high for the years covered by the 2022-2024 pre-print.

Families experiencing homelessness confront more barriers to accessing child care than impoverished families who have stable housing. Documented barriers include lack of documentation, mobility, lack of transportation, waiting lists, and lack of awareness and outreach by providers. Homeless families who are staying with other people (i.e. not in shelters)

¹ National Center for Homeless Education. 2020. Federal Data Summary School Years 2015-2016 through 2017-2018: Education for Homeless Children and Youth. <https://nche.ed.gov/wp-content/uploads/2020/01/Federal-Data-Summary-SY-15.16-to-17.18-Published-1.30.2020.pdf>

² U.S. Department of Education. 2020. Early Childhood Homelessness State Profiles: Data Collected in 2017-2018. <https://www2.ed.gov/rschstat/eval/disadv/homeless/early-childhood-homelessness-state-profiles-2020.pdf>

face additional barriers. They are often isolated, and they are not as well connected to school resources and opportunities as families who are staying in homeless shelters.³ All of these barriers have been exacerbated by the pandemic. Yet quality child care is essential for parents to pursue employment and education needed to obtain housing, and escape homelessness.

We offer suggestions below for strengthening the 2022-2024 pre-print to improve access to child care for families experiencing homelessness.

Monitoring, Oversight, and Data

Congress acknowledged and responded to these barriers through amendments to the Child Care and Development Block Grant of 2014, and ACF promulgated clear and strong regulations in 2016. Despite these statutory and regulatory requirements, state implementation of CCDF provisions on homelessness remains inconsistent, and in far too many places, weak. For example, a number of states have not fully carried out robust measures to prioritize children experiencing homelessness for child care, especially children whose families are not part of the formal shelter system, and stay in more hidden homeless situations (such as motels, or staying temporarily with other people). Training, technical assistance, and collaboration requirements are also lacking in too many states and communities. While we understand the limitations of block grants, and we appreciate the benefits of flexibility for states to design approaches that are appropriate for their populations, we urge ACF to explicitly include questions on homelessness in its child care monitoring systems, and to assist states in correcting deficiencies. We also urge ACF to improve quarterly and annual data on homelessness, as required by statute, and report this data publicly in a way that allows homeless service providers, early childhood programs, and others to track progress in increasing access and removing barriers.⁴

Coordination

Under 1.4.1(a), Lead Agencies are asked to describe how they coordinate with various agencies, including McKinney-Vento state coordinators for the Education of Homeless Children and Youth and, to the extent feasible, local McKinney-Vento homeless education liaisons. We recommend the following changes:

- Create two separate descriptions: one for collaboration with the State Coordinators and local liaisons and one for “other agencies providing services for children experiencing homelessness.” The role of state and local educational agencies on homelessness is very specific, legally mandated, and significantly different from the work of housing and homeless service agencies. It thus requires a different approach to collaboration, which

³ Administration for Children and Families, U.S. Department of Health and Human Services (2016). Access to Early Childhood Development Services for Homeless Families with Young Children: An Exploratory Project

⁴ <https://www.acf.hhs.gov/occ/resource/fy-2018-preliminary-data-table-19>

should be described separately from work with shelter, housing, and other homeless organizations.

- Delete the phrase “to the extent feasible” before “McKinney-Vento liaisons.” It is always feasible for Lead Agencies to collaborate with local liaisons. Every local educational agency is required to designate a McKinney-Vento liaison, who has specific responsibilities to identify and serve children experiencing homelessness. Coordination between the Lead Agency and local liaisons is essential in order for local liaisons to understand how to assist families experiencing homelessness to child care, and for Lead Agencies to understand local trends and barriers impact homeless families’ access to child care.

Increasing Access for Vulnerable Children and Families

In section 3.3, the pre-print notes that “child experiencing homelessness” is “a child who is homeless, as defined in Section 725 of Subtitle VII-B of the McKinney-Vento Act (42 U.S.C. 11434a) (98.2).”

This definition includes children staying in shelters, unsheltered locations, motels or hotels due to lack of adequate alternative accommodations, and with other people due to loss of housing economic hardship, or a similar reason.

Most children and youth experiencing homelessness are not in shelters or on the streets, but rather moving from place to place: couches, basements, motels, cars, and wherever they can find temporary refuge. Lack of shelters for families, and fear of shelters, mean that most families who are homeless are outside of the formal shelter system; indeed, only 12% of children experiencing homelessness were staying in shelters when they were first identified as homeless by public schools.⁵ Shelter space has been even further reduced during the pandemic due to social distancing protocols and shelter closures, and families have even more fear of seeking shelter. Yet families experiencing homelessness outside the shelter system are rarely able to socially distance, or limit their mobility; they are often at the mercy of others, and thus at high risk of transmission and infection of COVID-19, as well as predation and harm.

In our experience, Lead Agencies have focused more attention on families in shelters because these families are easier to identify and have relatively more stability. However, child care policies and outreach efforts that are focused only on children in shelter exclude over 80% of children experiencing homelessness, including some of the most vulnerable, whose parents are most in need of child care. Therefore, we recommend:

- In the note on the definition of homelessness in section 3.3, ACF should specify that children living in any of the situations described in the definition of homelessness must be considered in each policy and procedure where “homeless” or “homelessness” is

⁵ National Center for Homeless Education. 2020. Federal Data Summary School Years 2015-2016 through 2017-2018: Education for Homeless Children and Youth. <https://nche.ed.gov/wp-content/uploads/2020/01/Federal-Data-Summary-SY-15.16-to-17.18-Published-1.30.2020.pdf>

mentioned, and that ACF does not consider Lead Agencies to be in compliance with requirements related to homelessness if their policies and procedures on homelessness are limited to those in shelters.

- In section 3.3.2, clarify the prioritization of all children experiencing homelessness, including those who are not in the formal shelter system, by adding the language in bold: **“children experiencing homelessness, including in situations described in each part of the definition of homelessness in the CCDF rule.”**

In section 3.3.5, the Lead Agency must describe how it uses funds to ensure expedited enrollment, training and technical assistance, and outreach. In our experience, outreach to children and families experiencing homelessness has been limited and in many cases, weak. In addition, children with limited English proficiency and children with disabilities are disproportionately represented among families experiencing homelessness. To ensure effective outreach, and to ensure that children with limited English proficiency and children with disabilities have access to child care, we recommend:

- Require Lead Agencies to provide brief descriptions for each of the procedures listed under (b)(i)-(iii).
- Add a new procedure for Lead Agencies to describe how the Lead Agency will provide outreach and services to families experiencing homelessness with Limited English proficiency and children experiencing homelessness with disabilities.

Affordable Co-Payments

Lead Agencies are provided the option of waiving co-payments as a way to prioritize vulnerable populations. However, many families experiencing homelessness are simply unable to afford even minimal co-payments, or must choose between co-payments for child care or saving for rent and/or a security deposit. We therefore recommend that families experiencing homelessness be categorically exempt from co-payments.

Professional Development

In section 6.2.5, the Lead Agency must describe how it will provide training and technical assistance (TA) to providers and appropriate Lead Agency (or designated entity) staff on identifying and serving children and families experiencing homelessness.

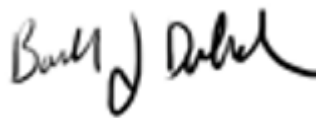
In our experience, providers continue to struggle with understanding and implementing the definition of homelessness required in the CCDF rule. Without clear understanding of the definition of homelessness, providers will struggle to identify, enroll, and serve families and children experiencing homelessness. We therefore recommend:

- Adding more specificity to the description of TA efforts on homelessness in Section 6.2.5 (a) and (b), as follows:

- Describe the state/territory’s training and TA efforts for providers in identifying and serving children and their families experiencing homelessness (relates to question 3.2.2), **including training on all parts of the definition of homelessness in the CCDF rule.**
- Describe the state/territory’s training and TA efforts for Lead Agency (or designated entity) staff in identifying and serving children and their families experiencing homelessness **including training on all parts of the definition of homelessness in the CCDF rule.**

Thank you for the opportunity to comment on the preprint, and for your efforts to ensure affordable and quality child care for this nation’s most vulnerable families. For more information, please contact me at barbara@schoolhouseconnection.org or 202.364.7392.

Sincerely,

A handwritten signature in black ink, appearing to read "Barbara Duffield". The signature is fluid and cursive, with a large initial "B" and "D".

Barbara Duffield
Executive Director