



Recommendations for the Federal Strategic Plan to Prevent and End Homelessness November 30, 2021

SchoolHouse Connection is the nation's leading expert on the early care and education of children and youth experiencing homelessness. We provide strategic advocacy and practical assistance in partnership with early childhood programs, schools, institutions of higher education, service providers, families, and youth. The core of who we are and what we do is our large national grassroots network composed of state and local homeless education coordinators, early childhood educators, student support professionals, advocates, researchers, and — most critically — young people with lived experience of homelessness.

The recommendations below are based on our daily direct interaction with our network, as well as decades of experience witnessing the many ways that previous federal strategic plans have fallen short, or failed outright. It is our hope that in light of the persistent — and often generational — crisis of homelessness, the Biden-Harris Administration will pursue fresh perspectives and new ideas. It is in this spirit that we offer the following feedback.

1) What should the federal government's top priorities be?

Historically, the federal government has focused the bulk of its resources and actions on homelessness through the emergency response system of one federal agency (the U.S. Department of Housing and Urban Development (HUD)) and on one subpopulation: visibly homeless single adults.

Yet many homeless adults first experienced homelessness as children or youth, failed to graduate from high school, and/or suffered various adverse events that impacted them throughout life. Efforts to intervene before these children and youth reached adulthood could have prevented their later bouts of more entrenched homelessness.

For example:

- 20% of unsheltered homeless adults in Los Angeles indicated that they first experienced homelessness when they were under age 18, and 25% first experienced homelessness when they were young adults between the ages of 18 and 24 (Flaming, Burns, and Carlin 2018).
- In a Seattle survey of homeless adults, 22% indicated that their first experience of homelessness occurred when they were children under the age 18, and 26% had their first experience of homelessness when they were between the ages of 18 and 24.

- In Minnesota, more than half (52%) of homeless adults surveyed first became homeless by the time they were age 24, and over one-third (36%) first became homeless at or before age 18.
- One-hundred percent of young adults who participated in in-depth interviews reported family-based instability and trauma; nearly 24% experienced homelessness with their family prior to experiencing homelessness on their own.

When homelessness for so many adults first occurs in childhood and in adolescence, homelessness is not “rare, brief, and one-time.” In order to address homelessness now and prevent it in the future, the federal government’s top priorities must include:

1. Inclusive metrics that reflect how all federal agencies define and measure homelessness, and how all populations experience it.

It is both inaccurate and misleading for the U.S. Interagency Council on Homelessness (USICH) to measure federal progress on homelessness using only, or even primarily, HUD data. For example, USICH states that “Between 2010 and 2020 there was a 29% reduction in the number of families with children experiencing homelessness, including a 67% drop in unsheltered homelessness among this population.” Yet during that same time period, public schools reported a 20% increase in the number of children and youth identified as experiencing homelessness, and no decrease at all in the number of unsheltered children and youth.

A true federal interagency approach necessitates giving equal attention and value to data from all other federal agencies, and in particular, the nation’s public schools. Public schools are universal institutions, and all states have compulsory attendance laws; in addition, public schools are required to proactively identify and enroll every child and youth experiencing homelessness, all year long, in every community. In contrast, HUD homeless data reflects only people who stayed in shelters (which don’t exist in many communities) or who were spotted outside (despite the fact that most families and youth stay in hidden situations). School and early childhood data thus offer a more accurate and comprehensive view of homelessness for children, youth, and families. Moreover, the statutory definition of homelessness used by public schools and early childhood programs reflects the fear, trauma, mobility, vulnerability, and lack of shelter options for youth and families. The statutory definition of homelessness used by the U.S. Department of Education (ED) is also more inclusive of communities of color; its use is therefore critical for advancing racial and ethnic equity, as we discuss below.

The new federal strategic plan must not only give equal value to the ED data on homelessness, it must also reflect ED’s goal to increase the identification of children and youth experiencing homelessness. A decrease in reported homelessness data does not equate to progress in “ending homelessness.” It may mean — as we have seen during the pandemic — that institutions like schools were not able to identify families and youth due to virtual learning, or that shelters reduced their capacity or closed entirely, or that early childhood programs and college campuses closed down, or that there were fewer trained volunteers for Point in Time counts, or that some time-limited housing models (like Rapid Rehousing) are counted as

“permanent” housing, while other time-limited models (Transitional Housing) are counted as “homeless.”

The new plan should include benchmarks that commend communities for increasing the numbers of children and youth experiencing homelessness who are identified by public schools, institutions of higher education, and early childhood programs. Only when children and youth are identified can they receive the protections and services to which they are entitled under federal law — protections and services that are necessary if they are to avoid homelessness as adults. Similarly, communities should be commended for increasing temporary housing options for specific populations, such as unaccompanied homeless youth, even if those options are time-limited and would appear to increase homelessness counts. Youth and young adults, including young families, need housing models that help youth successfully transition to young adults who are able to maintain housing stability and economic independence.

Ultimately, a federal strategic plan that only, or primarily, uses HUD data, and that identifies reductions in *HUD homeless data* as actual reductions in *homelessness*, undermines the efforts of public schools, early childhood programs, and institutions of higher education to address child, youth, and young adult homelessness. It also may serve as a disincentive for investing in time-limited housing models that promote successful transitions to adulthood. In sum, USICH’s new federal plan should be inclusive and respectful of all federal agencies’ data, metrics, and goals, and avoid benchmarks that reward short-term optics over long-term gains.

2. Increased enrollment, attendance, and completion of early childhood education, K-12 education, and postsecondary education for children and youth experiencing homelessness.

Education — from early childhood through postsecondary education — is among the most powerful antidotes to homelessness in the long-term, and a source of immediate support in the short term. Consider:

- Children who have been in quality preschool programs are more likely to graduate from high school, and to own their own homes as adults; they are also significantly more likely to be employed full-time and to have more financial and personal assets by their early forties, both strong protective factors against homelessness.
- Lack of a high school degree or GED is the single greatest risk factor associated with homelessness as a young adult; the second greatest risk factor is having a child; and the third is having a low income (under \$24,000). According to the data, the association between lower levels of education and youth homelessness remains even when other characteristics, such as race, sexual orientation, and household income, are taken into account.
- Some form of education beyond high school is increasingly necessary to move out of poverty and sustainably exit homelessness. Workers who have higher levels of education typically earn more and have lower rates of unemployment compared with workers who have less education. In addition, recent research found that having

postsecondary levels of education was associated with significantly lower probability of housing insecurity.

In light of this research, the new federal strategic plan to prevent and end homelessness should include specific goals for the enrollment, attendance, and completion of education, from early childhood (including child care) through postsecondary education. ED and U.S. Department of Health and Human Services (HHS) data should be used to help establish these metrics, many of which may already exist as part of Government Performance and Results Act measures. (For example, ED already has established targets for the next few years for homeless students' attendance, assessments, and graduation.)

In addition, the Education Leads Home (ELH) initiative has established specific goals for early childhood education, K-12 education, and postsecondary education. These multi-sector goals include:

- Young children experiencing homelessness will participate in quality early childhood programs at the same rate as their housed peers by 2026.
- Students experiencing homelessness will achieve a 90% graduation rate by 2030.
- Students experiencing homelessness will achieve a 60% postsecondary attainment rate by 2034

All three of ELH's goals should be reflected in the federal strategic plan, as should critical interim goals, such as increasing the number of unaccompanied homeless youth who complete the Free Application for Federal Student Aid (FAFSA). All federal agencies — including HUD — should be required to establish benchmarks to advance ELH goals and facilitate partnerships toward that end. For example, HUD should assign more points, and robustly monitor and enforce, the education assurances currently in the HEARTH Act.

Finally, the Build Back Better Act will provide a critical opportunity to advance all of three of ELH's goals. This historic legislation contains important homelessness-specific child care, preschool, and higher education policies that should be incorporated into the federal strategic plan.

3. Increase the quantity and quality of stable, safe, sustainable housing options for youth and for families, and expedite the distribution of housing and homelessness assistance to families and youth through schools and early childhood programs.

Lack of affordable housing is a significant driver of homelessness. The federal strategic plan should prioritize stable, safe, sustainable housing options that meet the needs of all populations, including families and children, as well as youth experiencing homelessness on their own. Housing should be tailored to the needs of communities, and provide options for wrap-around, trauma-informed, culturally-specific, two-generational, and age-appropriate services with the ultimate goals of economic independence and wellness (not simply having a roof over one's head).

In addition, our nation's schools and early childhood programs are uniquely poised to identify and assist families and youth at risk of and experiencing homelessness, and to deliver housing and homelessness assistance — either directly, or through community partnerships. Yet schools face many barriers to helping families and youth access housing and homelessness assistance (see question two for more detailed discussion). To increase the ability of schools and early childhood programs to expedite housing and homelessness assistance, the federal government should:

- Ensure that all families and youth who meet the education definition of homelessness are eligible for homelessness and housing assistance, and are not scored lower simply because of where they recently found a place to sleep. Schools, institutions of higher education, and early childhood programs cannot intervene early to prevent and solve homelessness if the vast majority of the families and youth they serve are blocked from assistance because they are deemed ineligible, or put last on the list. Education and health data support the conclusion that youth experiencing homelessness face similar vulnerabilities regardless of whether they are staying in shelters, temporarily with others, in motels, or other locations. Particularly during a pandemic, there is no solid justification for excluding or not prioritizing children and youth who stay temporarily with others. Such children and youth move frequently between crowded and often unsafe situations and are at risk of abuse and predation, as well as life-threatening illness.
- Permit families and youth to be referred directly from schools, early childhood programs, and institutions of higher education to public housing authorities and other housing agencies, without having to go through coordinated entry. There are a growing number of school-housing partnerships that are successful, in part because they permit a direct relationship between education and housing agencies, unmediated by the bureaucracy of the HUD coordinated entry and Continuum of Care system. These programs should be scaled and replicated.
- Reserve and target housing vouchers and rental assistance for families, youth, and young adults who are identified by public schools, institutions of higher education, and early childhood partnerships; couple this housing assistance with housing search, child care, transportation, and other supportive services.
- Support and prioritize funding for housing options for unaccompanied minors, including through the Runaway and Homeless Youth Act program and host homes, in partnerships with high schools. Models like Second Home in Oregon have impressive outcomes because of the powerful combination of educational and housing stability. These programs should serve as models for investment and replication nationwide.
- Emphasize schools and early childhood programs in eviction prevention, including by adopting these recommendations in this letter from 19 Members of Congress to the U.S. Department of Treasury.

4. Support a two-generational approach to solving homelessness by increasing access to high-quality early childhood programs and strengthening partnerships across programs for both parents and children experiencing homelessness.

The U.S. Department of Education estimates that over 1.3 million young children — infants, toddlers, and preschoolers — experienced homelessness prior to the pandemic. The impact of homelessness on their health and development can result in lasting harm, and set them up for hardships as adults, including continued homelessness. Programs like Head Start and Early Head Start not only support healthy early childhood development, they also have a broader capacity to support families, for example by employing Family Engagement Specialists who can help families reach their self-determined goals, including housing stability goals.

Congress has recognized the unique vulnerabilities of young children experiencing homelessness, as well as the barriers they face to accessing quality early childhood programs, by enacting strong protections and policies in Head Start and Early Head Start, federally-funded child care programs, and public preschool programs. However, lack of federal oversight has prevented these provisions from being fully implemented and reaching the children and families who need quality early care now more than ever.

In addition, many families experiencing homelessness are headed by young parents who face unique challenges due to their age and their own traumatic childhoods. According to Chapin Hall at the University of Chicago, approximately 1.1 million children have an 18- to 25-year-old parent who experienced homelessness during 2017-2018. Among young adults experiencing homelessness, 43% of women and 29% of men have at least one child (compared to 22% of young women and 14% of young men who have not experienced homelessness). Among teenagers experiencing homelessness (13- to 17- year-olds), 10% of girls and 3% of boys report having a partner who is pregnant or is a parent. These young parents and their children require comprehensive, developmentally-appropriate interventions to ensure that they thrive, and that they never experience homelessness again.

The federal government should prioritize two-generational efforts to support young children and their parents by:

- Designating children's specialists within HUD-funded family programs who can ensure that children and parents are connected to high-quality early care programs, and that homeless assistance programs are safe and developmentally appropriate for young children, and supportive of adolescent development.
- Creating an Office of Family and Youth Homelessness within the Administration for Children and Families at the U.S. Department of Health and Human Services to coordinate intra-agency efforts between the Office of Head Start, the Office of Child Care, the Office of Family Assistance, the Family and Youth Services Bureau, the Children's Bureau, and the Maternal and Child Health Bureau (MCHB). Each of these offices should designate a point of contact with specific responsibilities for homelessness outreach, oversight, and coordination. The new Office of Family and Youth

Homelessness would coordinate efforts closely with appropriate offices at the U.S. Department of Education.

- Developing a new demonstration program to increase and improve outreach to and services for young parents within ACF programs and the home-visiting programs at MCHB, with an explicit focus on youth experiencing homelessness.
- Elevating homelessness within ACF- and MCHB-program grant competitions by assigning points for specific activities to serve young parents experiencing homelessness and their children.

In addition, the Office of Head Start and the Office of Child Care should ensure appropriate oversight and implementation of existing statutory and regulatory requirements on homelessness, as well as robust implementation of the Build Back Better provisions on homelessness, by:

- Setting benchmarks for enrollment of homeless families and children, and monitoring progress using grantees' data.
- Providing targeted assistance to grantees who are under-enrolling children and families experiencing homelessness.

2) What are the biggest barriers in your community?

The single biggest barrier to addressing child and youth homelessness is its invisibility. Child and youth homelessness is largely hidden — hidden in schools, hidden in communities, hidden in homeless and housing systems, and hidden in nearly every federal strategic plan to prevent and end homelessness. While there has been movement toward youth engagement and leadership within the homeless system, the voices and insights of parents and students experiencing homelessness are nearly absent. The new federal strategic plan should:

- Specifically and intentionally solicit feedback from parents and students with lived experience of homelessness.
- Outline how states and communities, including schools, can raise awareness about child and youth homelessness: its prevalence, impact, and strategies for solving it.

3) How can the federal government more effectively center racial equity and support equitable access and outcomes at the local level?

Systemic racism is a profound driver of homelessness, as demonstrated by racial disparities in the likelihood of families and youth becoming homeless, in the prolonged harmful consequences of homelessness, and in barriers to accessing education and services. In high school, Black students are 2.25 times more likely to experience homelessness, and Hispanic students are 2 times more likely to experience homelessness, than their white peers. A February 2020 national survey of two- and four-year college students found that among racial and ethnic groups, American Indian, Alaskan Native, and Black students have the highest rates of homelessness. Research from California, Indiana, and Washington state demonstrate significantly lower

graduation rates and achievement for students of color who are experiencing homelessness. The federal government must prioritize racial equity in all systems as a key strategy in preventing and resolving homelessness.

Specifically, the federal government should:

- Make disaggregated child and youth race and ethnicity data publically available for each local educational agency (LEA), Head Start Agency, child care agency, and HUD continuum of care.
- Help communities use disaggregated data to identify disparities in enrollment, attendance, graduation/retention, and school discipline. Set benchmarks for progress toward eliminating these disparities, and provide funding and assistance to help agencies achieve these goals.
- Provide and incentivize funding for culturally-specific community-based organizations across federal programs, including through set-asides, points in competitions, subcontracts, and other means.
- Revise eligibility for homelessness and housing assistance to align with the ED definition of homelessness. According to data from the CDC's [2019 Youth Risk Behavior Survey](#) :
 - 29% of all doubled-up students (who are homeless under the ED definition) are Hispanic/Latino, 23% are Black or African American;
 - 8.3% of all Black/African American high school students are experiencing homelessness, and half of these students were in doubled-up settings when they completed the survey;
 - Based on these data, if the ED definition of homelessness were used by HUD, 83,317 more students of color would be eligible for homeless assistance (compared to approximately 51,000 more white students), just based on high school data alone.
 - These data are particularly striking because students of color often are under-identified by schools as being homeless. In many places, for example, Black students in particular are hesitant or afraid to self-identify as experiencing homelessness because of a significant lack of trust in a racist educational system ([see guest blog from Earl Edwards on this topic](#)). Therefore, the data we do have is likely under-estimating the number of Black families and unaccompanied youth, and other families of color and unaccompanied youth, who are living in doubled-up situations.

4) What lessons have you learned during the COVID pandemic about how housing, health, and supportive services systems can best respond?

It is unfortunate that this question omits schools. During the pandemic, public schools and early care programs were often the only agencies actively looking for and serving children, youth, and families experiencing homelessness. Many shelters closed, or reduced capacity. HUD waived regulations to reduce the frequency of contacts made by case managers during the pandemic. Yet many public schools actively increased outreach efforts to locate and connect youth and families experiencing homelessness when school buildings were closed, including going

door-to-door, visiting motels, posting notices in the community, and leveraging strategic local partnerships. Schools also devised ways to ensure that families and youth had food, technology, and other critical support. The most significant lessons learned include:

- McKinney-Vento homeless liaisons are instrumental in identifying children and youth experiencing homelessness and connecting them to much-needed services. However, lack of capacity for liaisons to carry out their duties greatly hinders their ability to support youth and families.
- There is no substitute for in-person learning both to identify children and youth experiencing homelessness, and to provide necessary support for learning and well-being. Communities must prioritize the safe return to in-person learning for all students, in particular students experiencing homelessness, including through transportation to school, after-school programs, and credit recovery programs.
- School districts and community-based agencies need maximum flexibility in using funds, both private and public, to meet the emerging and complex needs of students and families.
- Restrictions on eligibility for and uses of CARES Act and Treasury relief funds, as well as bureaucratic distribution systems, have prevented families and youth from receiving housing aid they need to stay housed or obtain housing. Schools should be centered in housing assistance delivery. The Treasury Department should adopt these recommendations.
- The disengagement of youth and families from school, coupled with the layers of trauma during the pandemic, will likely be felt for years to come. The effects will be most severe for students of color, students with disabilities, and English learners. Yet the unprecedented \$800 million dedicated to the education of children and youth experiencing homelessness through the American Rescue Plan Act (ARPA) has the potential to be transformative. It will allow for a much greater level of support in many more school districts, including through partnerships with community-based organizations. This funding level should be the new normal, including the flexibility in use offered by American Rescue Plan Homeless Children and Youth funds. Therefore, the Biden-Harris Administration should request at least \$800 million for the Education for Homeless Children and Youth (EHCY) program in the President's FY2023 budget.

5) Is there anything else you wish to add?

For too long, the federal response to homelessness has largely overlooked the plight of children and youth experiencing homelessness, and the value of education and the role of schools in solving homelessness. Yet public schools, early childhood programs, and institutions of higher education are not ancillary to the federal response on homelessness – they are central to it. Consider:

- There are approximately 20,000 local educational agencies (traditional public school districts and charter schools) in the United States, serving all communities. Every single one of them is required to designate a liaison to ensure schools proactively identify

children and youth experiencing homelessness, enroll and stabilize them, connect them to resources inside and outside of school, and support them in getting the education that is the single most important protective factor against future homelessness – a necessary prerequisite for employment, and many other indicators of well-being.

- There are over 1,600 agencies providing Head Start and Early Head Start programs in all 50 states serving 45,000 children experiencing homelessness under the age of five and their families. These programs serve pregnant women, as well as children, birth to age five, and their parents. Every single one of them is required to identify and remove barriers to enrollment and participation for children and families experiencing homelessness. Access to high quality early learning is a prerequisite to later school and life success.
- There are over 244,000 child care providers serving children who receive federal child care subsidies. Every single one of them has responsibilities to identify and remove barriers for families experiencing homelessness. Access to high quality child care is imperative for child development, and for parents to find and keep employment.
- There are over 6,000 colleges and universities in the United States. All college access programs and financial aid offices must address the needs of homeless youth. Some form of postsecondary education and/or training is increasingly necessary for obtaining a job that pays a living wage and to maintain housing.

An “all of government” response to homelessness must include all of these early care and education agencies. These are the systems to which families and youth are most connected, and in whom they may have the most trust. The federal government should strengthen and support homelessness responses within these early care and education systems, while other systems that touch the lives of families and youth experiencing homelessness – including health, child welfare, employment, and housing – must prioritize early care and education as critical components of long-term stability and permanent exit from homelessness.

Ultimately, homeless and housing interventions must be judged on their long-term impact on children and youth, including their educational outcomes; if they are not, children and youth will continue to cycle in and out of homelessness over their lifetimes, mired in poverty and its ill effects – and adult homelessness also will continue.

We urge the Biden-Harris Administration to correct the shortsightedness of previous federal strategic plans on homelessness, and instead embrace a broader and longer-term vision for the stability and wellness of all Americans, including our youngest.