



Left Out of “All In:” Children, Youth, and Families and the Federal Strategic Plan on Homelessness

In December 2022, the United States Interagency Council on Homelessness (USICH) released [“All In,” a new federal strategic plan to prevent and end homelessness.](#)

While the emphasis on equity and prevention are improvements over [the previous four federal plans](#), “All In” ultimately falls far short of what is needed to prevent and solve homelessness in the United States. Specifically, the plan excludes most children and youth experiencing homelessness from its key metrics; establishes a goal that conflicts with the mandates of early care and education agencies; omits early care and education from core pillars of the plan; and fails to address the complex and burdensome eligibility requirements that prevent children, youth, and families from accessing homelessness and housing assistance.

We urge USICH and its member agencies to revise the plan to 1) commend and incentivize effective identification and enrollment of children and youth experiencing homelessness in early care and education; 2) include specific goals, benchmarks, and targets for enrollment, participation, and outcomes in early care and education, from prenatal through higher education; and 3) specifically include early care and education in all three core pillars of the plan, including recommendations for revising eligibility criteria to remove barriers to assistance.

- 1. The new federal goal to reduce homelessness by 25% by 2025, using HUD Point in Time (PIT) data, excludes most children, youth, and families who experience homelessness. This keeps them invisible and marginalized in federal, state, and local action.**

“All In,” the new Federal Strategic Plan to Prevent and End Homelessness, creates a national goal to reduce homelessness by 25% by 2025, as measured by HUD’s “Point in Time” (PIT) count. However, the HUD PIT count only includes the number of people who are in shelter or transitional housing, or who are identified by volunteers during street counts. Most families and youth who are homeless do not stay in shelters, transitional housing, or on the streets. In fact, [less than 15%](#) of children and youth experiencing homelessness enrolled by public schools are in these situations when they are first identified as homeless.

- Shelters and transitional housing are often full, unable to serve families as a unit, closed to unaccompanied minor youth, or simply non-existent in too many communities. When families and youth are not able to access shelter, they are much less likely to be included in HUD’s counts.
- Families experiencing homelessness also are less likely than single adults to stay on the streets and other outdoor locations where they might be included in PIT counts, often because they are afraid that their children will be removed from their custody.

Unaccompanied youth also avoid living on the streets out of fears of interactions with authorities and exploitation from older adults.

- As a result of these circumstances, most children and youth experiencing homelessness stay in motels or temporarily with other people due to lack of alternatives; many move fluidly between these situations, which are often dangerous and highly insecure. This invisible and unstable homelessness is not included in HUD's limited methodology, but *is* included in definitions and data used by early childhood and education agencies. It is also associated with educational and health harms that are comparable to HUD-defined homelessness.

While the plan states that it will use “data and evidence” to drive decisions, it largely ignores data from the federal programs that see and serve children, youth, and families. By adopting a national goal that excludes most children and youth experiencing homelessness, and that excludes metrics from early childhood programs, public schools, and institutions of higher education — the nation's largest providers of services to children and youth — the new federal plan all but guarantees that energy, action, and resources will not be directed toward children and youth. In light of the [strong correlation between childhood homelessness and adult homelessness](#), this is a recipe for continued adult homelessness far into the future.

- 2. A national goal that creates incentives for communities to reduce homelessness according to the HUD PIT count directly conflicts with the mandates of early childhood programs and public schools. These agencies are charged with proactively *identifying and increasing* the enrollment of *all* children and youth experiencing homelessness — those who meet HUD's definition of homelessness, and those who do not. By establishing a national goal that conflicts with the requirements of early childhood and education systems, the new federal plan undermines its own focus on prevention.**

Early childhood programs and public schools are required to proactively identify *all* children and youth experiencing homelessness — those who meet HUD's definition of homelessness, and those who do not — in order to ensure that they receive educational protections and services. Congress specifically amended the Child Care Development Fund, the Head Start Act, and federal education law (the McKinney-Vento Act and the Individuals with Disabilities Education Act) to improve the identification of children and youth experiencing homelessness. The \$800 million of the American Rescue Plan dedicated to the education of children and youth experiencing homelessness was specifically intended to increase identification, and help address the disengagement from school related to the pandemic.

These proactive identification and outreach requirements are particularly important in light of [research demonstrating that not completing high school is the greatest single risk factor](#) for experiencing homelessness as a young person. Higher education also appears to be a protective factor against young adult homelessness: a [2019 study](#) shows four-year college enrollment to be nearly four times higher for young adults without experiences of homelessness

in the prior 12 months (52% compared to 15%). Yet higher education is barely referenced in the new federal plan.

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.”

Worse, decreases in reported homelessness by early childhood programs or schools may mean failure to comply with federal laws that require identification and outreach, or failure to dedicate adequate resources toward outreach, identification, and enrollment. Significant evidence exists that children and youth experiencing homelessness are severely under-identified by [early childhood programs](#), public schools (according to [CDC data](#) and by [a recent Center for Public Integrity investigation](#)), and in [higher education](#). By incentivizing communities to reduce homelessness according to HUD PIT data, and not creating any incentives for early childhood programs, public schools, and institutions of higher education to increase identification of children and youth experiencing homelessness, the new federal plan undermines federal early childhood and education policies and its own focus on prevention.

In sum, if the “whole of government” federal plan to reduce homelessness excludes the goals and mandates of early childhood and education systems — goals that are directly correlated with homelessness prevention — it is all but guaranteed to fail.

- 3. The new federal plan relegates homeless early childhood and education agencies to the “prevention” pillar of the plan. By leaving these agencies out of the core pillars of crisis response and housing and supports, the plan fails to leverage the knowledge, experience, and universal setting of the largest providers of services for children, families, and youth.**

By relegating early childhood and education programs to the “prevention” portion of the plan, the federal strategic plan treats most children and youth who are identified as homeless by early childhood programs and public schools as “housing insecure” or “at risk of homelessness.” But they are not merely “housing insecure” or “at risk of homelessness” — they are homeless, and their loss of housing has already occurred. Defining them as “at risk” of homelessness means they will continue to face barriers accessing housing and services because they will not be prioritized for assistance — indeed, they may not even be assessed.

Early childhood and education also play critical roles in the “housing and supports” pillar and the “crisis response” pillar of the plan. In fact, early childhood and education agencies are the

largest providers of services to children and youth experiencing homelessness, meeting urgent basic needs (food, clothing, and some health care needs) as well as important connections to housing. By relegating education exclusively to prevention, the plan fails to take advantage of the knowledge, experience, and universal setting of the largest number of front-line providers for families and youth. And even that inclusion appears to be an afterthought; the chart on page 69 indicates that the U.S. Department of Education was not included in the White House Homelessness Prevention Working Group that met from October 2021 through January 2022 to develop this section of the plan. Similarly, early childhood and education are excluded from the plan's section on interagency planning for disaster response, despite their critical roles in assisting children, youth, and families during disasters.

4. The new federal plan acknowledges that “complicated eligibility and documentation requirements can significantly delay the process of getting someone off the streets and into housing,” yet is silent on the ways in which HUD’s definition of homelessness and complex eligibility system bar children, youth, and families from receiving assistance, thereby perpetuating homelessness.

People who don't meet HUD's definition of homelessness are screened out of coordinated entry; as a result, their vulnerability is not evaluated or assessed, simply based on where they found a place to sleep. Being screened out creates barriers to the housing and services that are needed for stability, and ultimately perpetuates cycles of homelessness

SchoolHouse Connection's Youth Policy Corps members met with USICH staff in the summer of 2022 and emphasized that they often were more vulnerable and suffered the greatest harm when they were staying with other people, but during those times they would not have met HUD's definition of homelessness. Their experiences are confirmed by [CDC data](#) showing that youths' vulnerability to violence, suicide, substance abuse, hunger, bullying, and lack of sleep was comparable across various homeless situations, including those situations that are not included in HUD's definition of homelessness.

HUD's complicated eligibility system also creates barriers to interagency collaboration and referrals between schools, early childhood programs, and housing agencies.

In order to make meaningful long-term progress in preventing and solving homelessness, USICH should amend the federal strategic plan as follows:

1. The plan should include specific initiatives to commend communities for improving the identification of children and youth experiencing homelessness by early childhood programs, public schools, and institutions of higher education. Only when children and youth are identified by these agencies 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. **In sum, the numbers of children and youth**

experiencing homelessness who are identified and enrolled in early childhood, K12 schools, and higher education must *go up* before the number of adults experiencing homelessness will ever truly *go down*.

2. The plan should include specific goals, benchmarks, and targets for increasing the number of children and youth experiencing homelessness who are enrolled in Head Start/Early Head Start, Child Care, the Maternal Infant and Early Childhood Home Visiting Program, K12 public schools, and institutions of higher education. In addition, it should include specific targets for education-related outcomes, including attendance, high school graduation, and postsecondary attainment. For example, the U.S. Department of Education has established performance measures for achievement, high school graduation, and regular school attendance for each year through 2023. These measures, which are included in its [Congressional Budget Justification](#), should be explicitly included in the federal strategic plan to prevent and end homelessness.
3. The plan should specifically include early childhood and education in all three of its pillars – Housing and Supports, Crisis Response, and Prevention – as well as in responding to natural disasters. USICH staff should review existing information from the U.S. Department of Education, its technical assistance provider, and national organizations such as SchoolHouse Connection to learn how early childhood programs, K12 schools, and institutions of higher education are meeting basic needs and connecting families and youth to supports. Finally, the plan should specifically include recommendations to address the burdensome eligibility requirements that bar children, youth, and families from accessing federal supports, especially homelessness and housing assistance.