The U.S. Interagency Council on Homelessness recently requested input from stakeholders on revising the federal strategic plan to prevent and end homelessness. As one of the nation’s leading advocacy organizations on child, youth, and family homelessness, SchoolHouse Connection was invited to participate in the first stakeholder call, and also submitted formal written comments. We will continue to advocate for a strategic plan that confronts the realities of child, youth, and family homelessness, centers racial and ethnic equity, and recognizes the core role of early care and education.

Together, public schools, early childhood programs, and institutions of higher education are the primary homeless response system for children, youth, and families. They see more youth and families experiencing homelessness than the HUD homeless system; they know more about their needs; and, if they were properly supported and resourced, they could do even more to assist children and youth holistically to permanently resolve their homelessness. In sum, these agencies are not ancillary to the federal response on homelessness – they are central to it (especially in the wake of COVID-19).

1. If you were to propose one new initiative that the federal government is not doing now what would it be?

Currently, there is no focused federal initiative on homelessness prevention. The bulk of homelessness resources, attention, and energy are directed to the emergency response system, administered mostly through the U.S. Department of Housing and Urban Development (HUD). In addition, most attention and resources are overwhelming focused on visibly homeless adults, including and especially those who are chronically homeless.
However, 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 instance, 20% of unsheltered homeless adults in Los Angeles indicated that they first experienced homelessness when they were under age 18, and 25% when they were young adults between the ages of 18-24. In Seattle, 18% of homeless adults indicated that their first experience of homelessness occurred when they were under age 18, and 27% when they were between the ages of 18-24. And in the state of 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.

In addition, adverse childhood experiences (ACEs) are strongly correlated with adult homelessness. Examples of ACEs include emotional abuse, neglect, mental illness, parental separation and substance abuse. As the number of ACEs in a person’s life accumulate, the likelihood of experiencing homelessness increases. In Minnesota, the majority (73%) of homeless adults had experienced at least one ACE, and over half (59%) reported multiple ACEs. For each ACE reported by homeless adults, the average age of the first episode of homelessness drops considerably.

Finally, some of the best research on pathways into homelessness comes from Chapin Hall at the University of Chicago. The study, which was authorized under the Runaway and Homeless Youth Act and funded in part by HUD, found that 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 was having a child; and the third was having a low income (under $24,000). 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; 35% experienced the loss of at least one parent or primary caregiver; and 44% percent identified removal from family and placement in foster care as the beginnings of the instability that led to their homelessness. Racial disparities were evident in likelihood of becoming homelessness, as well as prolonged harmful consequences of homelessness.
Taken together, the studies cited above reveal how child homelessness can lead to youth homelessness, and then to adult homelessness, where children of homeless adults may start the cycle again. The findings also make painfully clear that housing alone is insufficient to prevent and “end” homelessness, and that without explicit connections and fervent attention to the complex root causes of family and youth homelessness – including systemic and structural racism – homelessness will continue for all populations. A multi-agency coordinated initiative on prevention is a critical part of a long-term strategy to stem the tide of homelessness.

2. Outside of prior USICH federal strategic plan focuses, what else might the federal government do to prevent and/or reduce homelessness?

There are over 18,000 local educational agencies (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 1,700 agencies providing Head Start and Early Head Start programs in all 50 states. 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 250,000 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 5,300 college 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.
Together, public schools, early childhood programs, and institutions of higher education are the primary homeless response system for children, youth, and families. They see more youth and families experiencing homelessness than the HUD homeless system; they know more about their needs; and, if they were properly supported and resourced, they could do even more to assist children and youth holistically to permanently resolve their homelessness. In sum, these agencies are not ancillary to the federal response on homelessness – they are central to it (especially in the wake of COVID-19).

This means the revised strategic plan should provide specific and detailed attention to the role of early care and education, in recognition that these are the systems to which families and youth are most connected, and in whom they have the most trust, as well as the systems that provide the best long-term path to prevent and interrupt cycles of homelessness. The federal strategic plan should strengthen and support homelessness responses within the early care and education systems, including the implementation of existing protections. Other systems that touch the lives of children, youth, and families – including health, employment, housing, and the HUD homeless system -- must prioritize early care and education as critical components of long-term stability and permanent exits from homelessness.

3. What is one activity the federal government is doing that you believe should be deprioritized?

The federal government’s homelessness strategy continues to prioritize the role of a single federal agency: HUD. Yet HUD’s definition of homelessness, its data, its program models, and its outcome measures are skewed to the short-term and the superficial. HUD’s current approach to homelessness is largely reactive, focused on adults, and focused on housing alone. Without significant reform, this approach will continue to fail and to perpetuate homelessness.

Public schools identified and enrolled 15 million children and youth experiencing homelessness in 2017-2018 – the highest number on record. Another 1.4 million children under age six are estimated to experience homelessness. Schools and early childhood programs are uniquely able to see the shortcomings of HUD homeless policies because schools can document histories of homelessness over the course of a school year, and over multiple school years. Schools and early childhood programs see and work with families that HUD considers to be a “success” because the family did not return to a federally-funded shelter in the same jurisdiction after they left the HUD program, but rather ended up in a motel or on a couch or in car, or in a shelter in another jurisdiction.
Schools and early childhood programs see families who were “diverted” by the HUD homeless system to motels and other dangerous situations under the faulty assumption that being in shelter is always worse. Schools and early childhood programs also see youth and families for whom housing alone, without appropriate services, exacerbates underlying problems that lead to homelessness and that prevent housing stability. Finally, schools and early childhood programs see families and youth experiencing homelessness who have no access to resources they need because they do not score high enough on deeply flawed and demonstrably racist vulnerability assessments – or because HUD not did not consider them to be homeless at all.

In part, these problems with HUD homeless policy stem from bureaucratic heavy-handedness; a blinkered, top-down policy approach; and a strong tendency to overprescribe. Despite diverse local contexts for homelessness, HUD has created strong federal incentives and requirements for certain kinds of housing models, like Rapid Rehousing, and for certain populations, like chronically homeless adults, that do not match all communities' and all populations' needs. Even when communities identify greater needs for other populations or program models, they must adopt national priorities in order to be competitive for funding. Each community should be able to determine its own priorities, and have multiple housing options for specific populations depending on their needs and goals.

In addition, the program models and priorities established by HUD are predicated on the view that homelessness is primarily, if not exclusively, a housing problem, solved by housing alone. This view has marginalized and defunded program models that address the complex root causes of homelessness, and that provide enough time to ensure that families and youth will be able to sustain housing on their own once they leave the program.

In particular, Rapid Rehousing – an intervention with origins in response to the recession, where many families needed short-term housing assistance to recover from homelessness due to foreclosure or job loss – has been overprescribed, including for families and youth suffering from deep poverty and its complications. In many jurisdictions, families and youth are not provided with the education, services, and employment supports they need, and so they cannot maintain their housing once the subsidy ends. Consequently, they experience repeated homelessness, re-traumatizing them and their children. Unaccompanied homeless youth under age 18 – the population for whom lack of shelter is the greatest challenge – are not even old enough to sign a lease, which precludes Rapid Rehousing as a viable option.
In a study conducted in Minneapolis, housing interventions were analyzed in light of up to four years of school records. Homeless students assigned to Rapid Rehousing had lower average attendance and lower math and reading achievement than children receiving only typical shelter services. In the comparisons that involved only permanent housing subsidies and Rapid Rehousing, homelessness was associated with achievement gaps in both math and reading achievement that persisted over years.

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.

In sum, quick-fix, adult-centric, housing-only models should be deprioritized; education and services should be incentivized and prioritized; and HUD’s data should no longer be presented as the official national data on homelessness. Data from public schools and early childhood programs reflect the way that children and youth actually experience homelessness, and, as universal institutions, schools and early childhood programs offer a better barometer of trends. The revised federal strategic plan should cease imposing one agency’s data, outcome metrics, language, and priorities on all other federal agencies. Rather, the revised plan should honor the data, outcome measures, priorities, and goals of each and every participating federal agency.

4. What is one activity that the federal government is doing well and that should be prioritized?

Last year, the Administration for Children and Families (ACF) at the U.S. Department of Health and Human Services held ten regional listening sessions on family and youth homelessness. These sessions brought together a wide range of stakeholders, including public and private agencies, faith-based organizations, school districts, and grantees and non-grantees. The purpose was to understand trends, learn about challenges and innovative responses, and share information about ACF programs and resources. Stakeholders were frank in expressing concerns about the fragmentation and silos between federal agencies, but also within agencies (for example, among ACF’s own programs). However, they also were very grateful for ACF leaders’ genuine interest in listening and learning, for bringing a much broader range of stakeholders together, and for the opportunity to understand the child, youth, and family centric approach to health and self-sufficiency that ACF brings to the homelessness conversation. Stakeholders also provided concrete recommendations for intra- and inter-agency work to build support for community efforts.
Since the listening sessions, ACYF Commissioner Elizabeth Darling has undertaken specific and individualized efforts to increase collaboration between RHYA grantees and Early Head Start grantees in order to help provide more support to young parents experiencing homelessness; Dr. Deborah Bergeron, the Director of the Office of Head Start, has created a campaign and new resources on homelessness, including online lessons, and resources in the wake of COVID-19; and ACF has created and validated an early childhood self-assessment tool for shelters.

The listening sessions and follow up activities are examples of an agency reaching out to stakeholders (including parents and youth) in a genuine attempt to learn, and looking within, at how it can better leverage its own existing resources, to assist children, youth, and families experiencing homelessness. Other agencies should seek to replicate ACF’s example.

5. Overall, what would you say the top 3 federal priorities should be as they relate to preventing and ending homelessness?

- Prioritizing the needs of children and youth experiencing homelessness across and within all federal agencies. We will never reduce homelessness in the long-term if children, youth, and families are not prioritized in all agencies. This means:
  - Adopting policies that take into account how children and youth actually experience homelessness (i.e. adopting the education definition of homelessness). This is especially critical in the wake of COVID-19, as families and youth who have no choice but to stay with other people temporarily cannot self-isolate or socially distance, nor are they protected by eviction moratoria. They are at high risk of trafficking, predation, and harm.
  - Putting the two federal agencies that best understand child and youth homelessness in the driver’s seat (the US Department of Education and the Administration for Children and Families at HHS).
  - Increasing the quantity and quality of affordable housing options for youth and families, and ensuring that both mainstream and targeted housing programs provide and incentivize wrap-around, trauma-informed, culturally-specific, and age-appropriate services with the goal of self-sufficiency and wellness (not simply having a roof over one’s head).
• Developing and implementing a coordinated homelessness prevention strategy with early childhood programs and public schools at the center. Early childhood programs and schools already serve as hubs for services and organic connections for youth and families. The federal government should undertake efforts to build on this role, and equip early childhood programs, public schools, and institutions of higher education to respond much more robustly to the needs of children and youth experiencing homelessness.

• Adopting policies and practices to eliminate racial disparities and ensure equity for children, youth, individuals, and families of color and historically marginalized communities. The long-standing harmful impacts of racism begin before birth and are evident in early childhood, K-12, and higher education. Black high school students are 2.67 times more likely to experience homelessness, and Hispanic high school students are 1.68 times more likely to experience homelessness, than White high school students. American Indian and Alaskan Native youth have some of the highest rates of homelessness compared to other racial/ethnic populations. These students of color are significantly less likely to graduate from high school, and therefore are significantly more likely to continue to experience homelessness as adults. Racial inequity is apparent in early childhood and higher education, and profoundly so in housing and homelessness systems. The federal government must prioritize racial equity in all systems as a key strategy in preventing and resolving homelessness.

6. In terms of homelessness, what areas are in need of greater attention at the federal, state and local levels?

• Federal level:
  o USED: The identification rates, attendance rates, and educational outcomes of children and youth experiencing homelessness require more attention. Homelessness has a damaging impact on academic outcomes that is over and above poverty, and is not ameliorated by the mere provision of housing. Based on data from 49 states, the 2017-2018 national average graduation rate for students experiencing homelessness was 67.8 percent, which is more than 10 percent below other low-income students, and nearly 20 percent below all students. The low graduation rate of these students is of particular concern because lack of a high school degree or GED is the single greatest risk factor for homelessness as a young adult, and contributes to challenges in securing employment. Enrollment and participation in LEA-administered preschool programs also requires more attention, as does participation in some form of education beyond high school, whether career and technical education, community college, or four-year college. Higher education programs and initiatives – including financial aid – must be attentive to the unique needs of unaccompanied homeless youth. All of these improvement efforts require attention to data disaggregated by homeless status and race and ethnicity.
- **HHS**: More attention is needed to help states implement existing provisions for child care for families experiencing homelessness; to help Head Start and Early Head Start programs build capacity to identify and retain children experiencing homelessness; and to increase the ability of home-visiting programs to serve families experiencing homelessness. A great deal more attention is needed to help programs serving young parents meet the developmental needs of both parents and children experiencing homelessness. Finally, both TANF and the child welfare system could be reformed to help prevent family and youth homelessness.

- **HUD**: More attention is needed to the specific needs of children and youth within HUD-funded programs, and connections to early care and education programs.

- All agencies should review policies that act as barriers to children, youth, and families who do not have safe and stable housing.

- **State and Local**: The same areas for ED, HHS, HUD, and all agencies listed above require more attention at the state and local level.

### 7. Anything else you wish to add?

We are grateful for the opportunity to provide input on the federal strategic plan. While we pride ourselves on our close relationships with youth and with practitioners in early care, education, and youth and family services, there is no substitute for direct interaction with, and listening to, people with lived experience (including children, and youth, and parents). We also believe the voices of direct service providers, as well as early care and education professionals, are essential, and hope that they will continue to be sought out as the strategic plan is revised.