



September 4, 2020

Dr. Victor J. Dzau  
President  
National Academy of Medicine  
500 Fifth St. NW,  
Washington, D.C. 20001

Submitted via online portal: <https://www.nap.edu/vaccine/>

Re: Preliminary COVID-19 Vaccine Allocation Framework from the Nation Academies

Dear Dr. Dzau:

SchoolHouse Connection (SHC) appreciates the efforts of the National Academies of Science, Engineering, and Medicine for to ensure equitable allocation for a COVID-19 vaccine. We are a national nonprofit organization working to overcome homelessness through education. Our national network is composed of school district homeless education liaisons designated the McKinney-Vento Act, early childhood programs, institutions of higher education, community homeless service providers, families, and youth.

Through our work, we have seen the devastating effects of the COVID-19 pandemic on families and youth experiencing homelessness, and the tremendous barriers that they face to health and safety. These barriers are exacerbated by systems that fail to account for the lived realities of family and youth, including their mobility, fear of authorities, and inability to access shelter or housing due to restrictive housing eligibility criteria. We urge that vaccine allocation prioritization and strategies reflect the lived experiences of families and youth experiencing homelessness, and the heightened risks they face, as well as the systems that are best poised to assist them.

Prior to the COVID-19 outbreak, public schools reported a record 1.5 million children and youth experiencing homelessness, preK-12, for the most recent year reported (2017-2018).<sup>1</sup> In

---

<sup>1</sup> 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>

addition, the U.S. Department of Education estimates that 1.4 million children under age six -- infants, toddlers, and preschoolers -- are experiencing homelessness.<sup>2</sup> As disturbing as these numbers are, they significantly underestimate the actual number of children and youth experiencing homelessness. Analysis of the CDC's Youth Risk Behavior Survey indicates that public schools are identifying only slightly more than half of high school students experiencing homelessness.<sup>3</sup> In addition, many youth and young adults also experience homelessness on their own, without a parent or guardian. National research from the University of Chicago's Chapin Hall found that approximately 4.2 million youth ages 13-25 experienced homelessness on their own during a 12-month period.<sup>4</sup> The current economic crisis and family stress related to shelter-in-place orders are expected to create new waves of youth and family homelessness.

Under federal early care and education law (the McKinney-Vento Act), children and youth are considered homeless if they are staying in shelters, cars, motels, or with other people temporarily due to loss of housing, economic hardship, or a similar reason. This definition of homelessness reflects the reality of family and youth homelessness: many communities lack shelters for families and youth, and many families and youth fear shelter and the streets. For these reasons, families and youth are much more likely to stay temporarily with other people, or in motels. According to the National Center for Homeless Education, while 7% of homeless students were unsheltered, and 12% were in shelters, 74% of students experiencing homelessness were staying with others in these informal, fluid, congregate settings.<sup>5</sup>

Within the proposed framework for COVID-19 vaccine allocation, Tier 2 contains a provision for "those whose living or working conditions give them elevated risk of infection, even if they have lesser or unknown risk of severe illness and death." Families and youth who meet the full education definition of homelessness, including those who are temporarily staying with others, should be included within this section. These living situations are often crowded, unsafe, and do not provide families and youth with the opportunity to safely and effectively self-quarantine. Staying with other people puts families and youth at the mercy of other people in arrangements that are precarious, volatile, and lead to frequent moves.

---

<sup>2</sup> 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>

<sup>3</sup> SchoolHouse Connection. 2019. Student Homelessness: Lessons from the Youth Risk Behavior Survey (YRBS): Prevalence, Identification, and Action Steps for Schools. <https://www.schoolhouseconnection.org/wp-content/uploads/2019/05/YRBS-identification.pdf>

<sup>4</sup> Morton, M. H., A. Dworsky, and G. M. Samuels. 2017. Missed Opportunities: Youth Homelessness in America. National Estimates. Chicago, IL: Chapin Hall at the University of Chicago. <https://voicesofyouthcount.org/wp-content/uploads/2017/11/VoYC-National-Estimates-Brief-Chapin-Hall-2017.pdf>.

<sup>5</sup> 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>.

Parents and youth experiencing homelessness, including those who are staying with others, also often work in occupations that have been deemed essential since the onset of the pandemic. In a recent Congressional briefing hosted by SchoolHouse Connection, we heard from a parent who shared the challenges she faced:

*“I’m staying in someone else’s house who is afraid of COVID, which is difficult. Me and my kids are sleeping on the floor and also, I did get sick. I had to quarantine for 14 days in somebody else’s house. So that was really difficult. They gave me to the end of July, and then I gotta go, and I respect that. Some people, they don’t want to catch COVID. They’re afraid because I still have my part-time job, and I work in a grocery store. People at the grocery store, and my job at Amazon, have been catching COVID so everyday, I worry about catching it and I don’t want to bring it back home to my kids!”*

Freda Mason, Congressional Briefing on the Impact of COVID-19 on Family Homelessness, July 16, 2020

Ms. Mason’s quote not only highlights the plight and threat to health and wellbeing that is faced by persons who are temporarily staying in the homes of others, but also the fact that many persons who do find themselves in these situations also work in jobs that have been deemed essential, putting them and those around them at heightened risk of infection and transmission of COVID 19.

The intersectionality between the status of homelessness and race puts these populations at even higher levels of vulnerability. Systemic racism has long played a role in homelessness, including for families and youth. Analysis of the CDC’s Youth Risk Behavior Survey finds that Black high school students are 2.67 times more likely to experience homelessness than White high school students, while Hispanic high school students are 1.68 times more likely to experience homelessness than White high school students.<sup>6</sup> In addition, fifty-five percent of families living in homeless shelters that are funded by the U.S. Department of Housing and Urban Development were Black, and 29% Latinx.<sup>7</sup> Black and Hispanic populations also face higher risk of certain health conditions, such as diabetes and hypertension, which put them at heightened mortality risk if they contract COVID-19.

We recommend that the McKinney-Vento Act’s Education for Homeless Children and Youth Program (EHCY) be utilized as a mechanism to find homeless families and youth, and distribute the vaccine to them. The McKinney-Vento Act requires that every local educational agency designate a liaison for homeless children and youth; the liaison is responsible for identification, enrollment, and service delivery. Local homeless liaisons are providing

---

<sup>6</sup> SchoolHouse Connection. 2019. Student Homelessness: Lessons from the Youth Risk Behavior Survey (YRBS): Racial and Ethnic Equity: Disproportionality and Action Steps for Schools. <https://www.schoolhouseconnection.org/wp-content/uploads/2019/05/YRBS-raciaethnic.pdf>

<sup>7</sup> U.S. Department of Housing and Urban Development, 2020. The 2019 Annual Homelessness Assessment Report to Congress. <https://files.hudexchange.info/resources/documents/2019-AHAR-Part-1.pdf>

outreach, tracking, and coordinating services for families and youth who meet the education definition of homelessness. The EHCY program therefore provides strategic means by which this particular population can be reached and assisted to access the vaccine, no matter where families and youth are staying.

Thank you very much for considering our comments. Should you have any questions, please do not hesitate to contact me at [barbara@schoolhouseconnection.org](mailto:barbara@schoolhouseconnection.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Barbara Duffield". The signature is written in a cursive, flowing style.

Barbara Duffield  
Executive Director