

July 11, 2020

United States Interagency Council on Homelessness

301 7th Street, SW, Room 2080

Washington DC, 20407

RE: Public input to revise the federal strategic plan to prevent and end homelessness

To Whom it May Concern:

On behalf of the undersigned organizations, we thank you for the opportunity to provide input into revisions to the federal strategic plan to prevent and end homelessness. We represent a diverse group of organizations from across the country dedicated to improving access to early care and education programs, including Head Start programs, advocacy organizations, membership organizations, child care resource and referral agencies, homeless service agencies, and others. We believe the federal strategic plan can be an important tool for guiding the efforts of multiple sectors toward a common goal, preventing and ending homelessness, and are eager to continue working in partnership with other sectors to achieve that goal.

Current and former iterations of the strategic plan have reflected a vision for a cross-sector, coordinated approach to preventing and ending homelessness, which we believe is critical to effectively addressing homelessness, particularly among families. Unfortunately, that vision has not yet come to fruition, and although there has been some mixed progress in reducing the number of people who experience literal homelessness, the number of children and families who experience homelessness continues to rise. Earlier this year, the United States Department of Education reported a record high of 1.5 million children identified as experiencing homelessness in schools during the 2017-2018 school year¹. Data from the Department of Housing and Urban Development has also persistently demonstrated that the youngest children are disproportionately impacted by homelessness², which is alarming given what is known about the effects of homeless experiences on child health and development in the earliest years³. Additionally, many experts and providers working in the field believe that homelessness among families is

¹ National Center for Homeless Education. (2020). *Federal Data Summary School Years 2015-16 through 2017-18: Education for Homeless Children and Youth*. Retrieved July 8, 2020 from <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, Office of Planning, Evaluation and Policy Development, Policy and Program Studies Service. (2019). *Early Childhood Homelessness State Profiles 2019*. Retrieved June 3, 2020 from <https://www2.ed.gov/rschstat/eval/disadv/homeless/early-childhood-homelessness-state-profiles-2019.pdf>.

³ National Center on Early Childhood Health and Wellness. (n.d.). *Caring for the Health and Wellness of Children Experiencing Homelessness*. Retrieved June 3, 2020, from <https://eclkc.ohs.acf.hhs.gov/publication/caring-health-wellness-children-experiencing-homelessness>.

likely to increase as the COVID-19 public health emergency persists and presents even greater barriers to employment, education, and other services.

The science is clear that adverse experiences, like housing instability during pregnancy and into a child's earliest years, can have a life-long negative impact on educational, health, and well-being outcomes⁴. We must take swift action to both mitigate the negative impacts of homelessness on young children through connection to appropriate supportive services, such as early care and education and health services, and prevent harm in the first place through better access to safe and stable housing for families. If we ever hope to truly prevent and end homelessness, it is imperative that we commit more effort and resources to strengthening and supporting children and their families to be healthy, safe, and ready to succeed in school so that they can thrive as adults. To that end, we offer the below recommendations to the United States Interagency Council on Homelessness (USICH) and its member agencies to consider as revisions are made to the federal strategic plan.

- **Reconstitute the Early Childhood Committee of USICH** and charge the committee with developing and advancing cross-system strategies for addressing homelessness among young children and their families. The needs of young families are very complex, as are the systems they interact with. Achieving cross-sector impact will require a dedicated space for various federal agencies to engage in ongoing collaboration. Additionally, we recommend building on the leadership shown by the Office of Head Start (OHS) with its Home at Head Start Campaign and ensure OHS is represented on the committee. Additionally, representatives from the Office of Child Care and the Family and Youth Service Bureau should be included as well.
- **Include more focus on developing and supporting the workforce across sectors.** It is not easy to serve families and individuals experiencing homelessness in any setting—the work is very demanding and given the complexity of family needs, specialized skill and knowledge is required to appropriately and successfully serve families. Yet, jobs working with families experiencing homelessness often come with low wages, few or no benefits, and high turnover, and as a result, do not always attract and retain the highly-qualified, skilled, and experienced workforce needed to help families truly thrive. This is true in many early childhood programs and homeless services organizations. In addition, higher education programs that prepare many professionals that work with homeless populations, such as those working in the medical or education fields, seldom include specific content related to homelessness, and almost no information relating to the impact of homelessness on infants and toddlers. We encourage USICH to consider initiatives that build capacity amongst our cross-sector workforce to serve homeless populations through pre-service preparation, job-embedded professional

⁴ Center on the Developing Child (2010). *The Foundations of Lifelong Health* (InBrief). Retrieved on June 3, 2020, from www.developingchild.harvard.edu.

development, and interprofessional training and education. In addition, USICH should focus on strategies to increase compensation for all those doing this very challenging and very important work.

- **Develop and implement cross-agency demonstration or waiver projects.** The current strategic plan strongly encourages cross-system collaboration and innovation to support young children and their families who experience homelessness, yet, to our knowledge, there are few examples of robust cross-system partnerships. Those that do materialize are often done with great effort from a handful of enthusiastic stakeholders and can be very difficult to maintain and grow over time. The current cross-system policy and funding landscape presents many barriers and disincentives to engaging in innovative, cross-system initiatives and projects, and we encourage USICH and its member agencies to identify and examine those barriers and take steps to remove them. Furthermore, we encourage agencies to identify ways to incentivize and proactively support cross-system innovations to support young children and their families who experience homelessness. One opportunity to discover efficiencies and creative solutions would be to develop and implement cross-agency demonstration or waiver projects that could help communities better utilize resources and expertise from across systems to positively impact families. For instance, evidence-based early childhood home visiting could be paired intentionally with homeless services to create developmentally appropriate supportive housing models that targets pregnant people and families with infants and toddlers.
- **Better leverage the federal technical assistance system to support cross-system collaboration.** We recommend that USICH and its member agencies examine opportunities for collaborative initiatives across federal technical assistance providers. As an example, federal agencies and private sector partners have developed a number of resources and tools that could be utilized to support collaboration and improve quality of services, such as the recently validated and updated *Early Childhood Self-Assessment Tool for Family Shelters*⁵. Although the tool is available free of charge, it is not yet being widely used; however, a small amount of targeted funding and paired technical assistance would likely facilitate greater implementation of this tool. In addition to supporting community-based providers to collaborate and improve services for children, initiatives that provide collaborative technical assistance across various federal contractors could also build capacity of technical assistance providers as well.
- **Identify and remove policy and funding barriers to enrollment in early care and education programs and services for families experiencing homelessness and strengthen incentives and supports for serving this population.** Although many policies have been established in recent years that make families experiencing homelessness a priority for enrollment in many early childhood programs, including Head Start and child care, enrollment data has not yet

⁵ https://www.acf.hhs.gov/sites/default/files/ecd/ec_self_assessment_tool_for_shelters_v5_21_2020.pdf

demonstrated a significant impact. We recommend that USICH and its member agencies examine this issue, potentially through research initiatives that can identify barriers and facilitators for enrollment.

- **Include a focus on racial equity.** Data show that people of color, especially black people, Native Americans, and Latinxs, are disproportionately impacted by homelessness⁶. We recommend that USICH and its member agencies include a focus on racial equity goals and initiatives in the new strategic plan.
- **Include a focus on data.** The data available on young children experiencing homelessness is fragmented and incomplete. The two primary sources of data on children experiencing homelessness, the Annual Homeless Assessment Report and the Department of Education McKinney-Vento program, are not wholly inclusive of young children. The former excludes children who do not experience literal homelessness, leaving the vast majority of children who are in homeless living situations, such as those sharing the housing of others temporarily or those living in motels, uncounted. The latter source only counts children who are enrolled in early childhood programs administered by state and local education agencies or otherwise served by those entities, which are not universally available in the way K-12 public education is and therefore do not include the vast majority of children under kindergarten age. Some other early childhood programs collect data on the number of children experiencing homelessness served, but not all, and those programs also do not have the capacity to serve all eligible children. We greatly appreciate the efforts of the Department of Education to release the *Early Childhood Homelessness State Profiles*⁷ annually, as it provides helpful estimates of the prevalence of homelessness among young children; however, we know there is much more we could do to strengthen data collection and reporting on this population, and expand available data. We urge USICH and its member agencies to include initiatives that improve the collection and reporting of accurate and timely data on young children experiencing homelessness as well as those that improve its use in decision making and planning, especially at the community level.
- **Increase focus on pregnant people and infants and toddlers.** As stated earlier, the negative impacts of homelessness begin accumulating before birth and can have lasting effects on children and their families. Families with the youngest children need prioritized access to safe and stable housing and those who experience homelessness should be more intentionally supported in accessing programs that can mitigate the negative impacts, such as IDEA Part C, early childhood home visiting, doula services, and prenatal care. Focused efforts on supporting infants, toddlers, and pregnant people who experience homelessness to date have been limited, leaving plenty of both need and opportunity. We recommend that USICH and its member agencies make this subpopulation a specific focus in the new plan.

⁶ <https://endhomelessness.org/resource/racial-inequalities-homelessness-numbers/>

⁷ <https://www2.ed.gov/rschstat/eval/disadv/homeless/early-childhood-homelessness-state-profiles-2019.pdf>

Thank you again for the opportunity to provide input into the next federal strategic plan to prevent and end homelessness. We stand ready to work in partnership with USICH and its member agencies to meaningfully advance efforts to prevent and end homelessness among families in the coming years. If you have any questions about these recommendations, feel free to contact Carie Bires, Director, Illinois Policy, Ounce of Prevention Fund at cbires@theounce.org.

Sincerely,

NATIONAL & MULTI-STATE ORGANIZATIONS

Child Care Aware of America



Institute for Child Success



INSTITUTE for CHILD SUCCESS

National Association for the Education of Homeless Children and Youth



National Head Start Association



NATIONAL HEAD START ASSOCIATION

The Ounce of Prevention Fund



Research Institute for Key Indicators



CALIFORNIA

Valley Oak Charter

HAWAII

Hawai'i Children's Action Network



ILLINOIS

Facing Forward to End Homelessness



Illinois Head Start Association



YWCA Metropolitan Chicago



MINNESOTA

People Serving People



NORTH CAROLINA

Child Care Services Association



WASHINGTON

Partners for Our Children