



# Facilitating Access to Early Care and Education for Children Experiencing Homelessness

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# Introduction

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The experience of homelessness is a known risk factor for young children, ages birth to 5.<sup>1</sup> Children experiencing homelessness benefit from early care and education (ECE);<sup>2</sup> however, states, communities and ECE providers face many barriers to ensuring access to care for these young children. The purpose of this brief is to: (1) discuss the barriers to accessing ECE among families experiencing homelessness, and (2) describe ways in which states and communities support the enrollment of children experiencing homelessness in ECE. We provide a summary of the methods and findings from a series of key informant interviews with agency or organization leaders in selected states and communities. To conclude, we summarize interview themes, highlight relevant resources, and discuss the next steps for supporting ECE access for this population.

## Early childhood homelessness and ECE

Almost half of all children in federally funded shelters are children ages birth to 6 (49.6%).<sup>3</sup> Children who experience homelessness are more likely than their permanently housed peers to experience other risk factors, such as being born prematurely,<sup>4</sup> being born at a low birth weight,<sup>5</sup> physical and mental health problems,<sup>6,7,8</sup> developmental delays, and poor academic achievement.<sup>9</sup> High-quality ECE can help children overcome some of the negative factors associated with homelessness.<sup>10</sup> However, ECE providers who wish to serve children experiencing homelessness face many challenges in ensuring that these children have access to care. Difficulty in identifying and providing outreach to families experiencing homelessness is one example of these challenges. Moreover, findings from several reports indicate that families also face numerous challenges in accessing high-quality ECE, including limited access to reliable transportation, and concerns about the cost of care.<sup>11</sup>

Over the past several years, efforts to improve access to ECE for this vulnerable population have been made at the program, community, state, and federal levels. Examples at the state and local levels include initiatives in which ECE programs have begun partnering with housing agencies to identify and provide outreach to families facing housing instability and homelessness.<sup>12</sup> Additionally, through implementation of federal policies (including the McKinney-Vento Homelessness Assistance Act, the Every Student Succeeds Act [ESSA], the Head Start Act, and provisions added to Child Care

## McKinney-Vento Homeless Assistance Act

While housing policy does not explicitly address the early learning needs of children experiencing homelessness, the McKinney-Vento Homeless Assistance Act, reauthorized in 2001, provides funding for a variety of homeless service initiatives. It also establishes the educational rights of children and youth experiencing homelessness. In 2015, the Every Student Succeeds Act, though typically viewed as a K-12 policy, amended this legislation to more explicitly address the needs of preschool-aged children. The McKinney-Vento Homeless Assistance Act applies to state education agencies that are responsible for the removal of barriers to accessing education. This includes publicly funded preschool (available to children birth to age 5, operated by a local education agency or agency receiving public funds). The legislation also promotes continuity of education for these children by offering the option of remaining in their school of origin even if they currently reside in a different school district.

Local education agencies are responsible for designating a McKinney-Vento liaison for their district. The liaison should participate in professional development offered by state education agencies, identify children experiencing homelessness in their district, and coordinate outreach and services with other entities and agencies. Under this legislation, publicly funded preschools must have provisions in place to provide a grace period for these families to provide documentation such as birth certificates, health records, and immunization records. Additionally, given that families experiencing homelessness may have difficulty providing required documentation such as a letter of residency, the local education agency must offer alternatives for submitting this paper work (e.g., a letter from the shelter where the family resides, a self-declaration).

Development Fund [CCDF] state plans), states and communities are promoting access to high-quality ECE for preschool-aged children experiencing homelessness.

It is important to understand how individual states and communities work to support ECE access for these young children. Therefore, we interviewed key informants from several states and communities to learn more about the challenges they face, and the promising practices they engage in to promote ECE access for this vulnerable population. In the following sections we describe how we conducted the interviews and present the key themes that emerged from them.

## Key Informant Interviews

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Researchers from Child Trends interviewed key informants from agencies at the state, county, or local level within a set of six selected states and communities, in order to gain an in-depth understanding of the network of supports available to families experiencing homelessness and the challenges they face in accessing high-quality ECE. The research team selected states and communities based on their reputation for supporting ECE access for this population. When determining which states and communities to include, the team considered the number of children ages birth to 5 experiencing homelessness in the state or community, whether there were any special programs or initiatives in place to increase access to ECE for this population, and whether their Child Care and Development Fund (CCDF) plan had specific provisions in place to support subsidy access for this population. The final list of states and communities was selected in consultation with the project team and our project officer from the Office of Planning, Research and Evaluation. Key informants were interviewed from four states (North Carolina, Idaho, Minnesota, and Oklahoma), and two cities (Washington, DC and Los Angeles).

### Design and methods

Key respondents included child care subsidy staff, housing administrators, Head Start state collaborators, and others across the housing and education fields. Since each key respondent supports families in different capacities, we developed three interview protocols to capture each agency's unique perspective: (1) ECE, (2) housing, and (3) subsidy.

1. The **ECE interview** protocol includes questions about how families experiencing homelessness access ECE and the data sources that support or facilitate this process.
2. The **housing interview** protocol focuses on the role of HUD's data systems, as well as barriers that families face when accessing ECE.
3. The **subsidy interview** protocol focuses specifically on the role of the CCDF legislative changes and how these new provisions may impact access to high-quality ECE for families experiencing homelessness.

The purpose of the interviews was to answer the following research questions:

1. What initiatives exist to assist families experiencing homelessness in accessing high-quality ECE?
2. What barriers do families experiencing homelessness face in accessing high-quality ECE?

The researchers interviewed the key respondents in winter of 2018. Each interview took approximately one hour to complete, and the interviewer transcribed the interviewee's responses. One researcher interviewed respondents from North Carolina, Idaho, and Los Angeles, and the other interviewed respondents from Minnesota, Oklahoma, and Washington, DC. The research team invited staff from comparable offices and programs across all states and communities to participate in the interview; however, not all staff were able to participate. Respondents across all states and communities, except Los Angeles, received two of the three protocols (see Table 1). One researcher coded the ECE and

early childhood community and school-based program protocols and the other coded the subsidy and housing protocols. To ensure reliability of the codes, researchers worked together to summarize data and identify key themes on a subset of the interviews. After the initial themes were identified, the research team developed codes by consensus. The research team then audited each other’s code application for 10 percent of the interviews. Key themes were then compared across respondent types.

**Table 1. State/Localities by interview protocol and respondent type**

Interview Protocol	North Carolina	Minnesota	Idaho	Oklahoma	Los Angeles, CA	Washington, DC
ECE	✓ (n=1)	✓ (n=1)		✓ (n=1)		✓ (n=1)
Subsidy	✓ (n=3)		✓ (n=2)		✓ (n=1)	✓ (n=2)
Housing	✓ (n=2)	✓ (n=1)	✓ (n=1)	✓ (n=1)	✓ (n=1)	

Note: Child Trends completed 13 interviews across 18 respondents. The total number of respondents participating in each interview varied from one to three respondents.

## Findings

The findings from each community are organized by key themes. Across all 13 interviews, six themes appear: (1) policy- and program-level challenges to ECE access for families experiencing homelessness, (2) family-level challenges and barriers to ECE access, (3) the need to improve the relationship between ECE and housing, (4) community-level ECE supports, and (5) professional development for the ECE and housing workforces.

### Policy- and program-level challenges

Respondents indicated that there are policy- and program-level challenges to providing ECE services for children ages birth to 5 experiencing homelessness. At the policy level, respondents from North Carolina’s Head Start State Collaboration Office and from a statewide early childhood initiative in Oklahoma stated that the revised Head Start standards providing homeless families more flexibility to meet certain enrollment requirements (see textbox on page 6) improved the number of homeless families enrolled. However, as the respondent from North Carolina’s

### Head Start

The Improving Head Start for School Readiness Act was signed into law in December 2007; in part, this act required the identification as well as the categorical eligibility and prioritization of children and families experiencing homelessness in both Head Start and Early Head Start programs. The 2016 Head Start Program Performance Standards (HSPPS) include several standards (aligned with McKinney-Vento and ESSA) addressing barriers to enrollment for children experiencing homelessness. First, families experiencing homelessness have several options for producing a letter of residency (required by Head Start for enrollment): Families may provide a letter from their housing program, or the family they are staying with if doubled-up, or they can provide a self-declaration. Similarly, if providing proof of age is a barrier to enrollment, Head Start will allow families to enroll their children while they support families in accessing appropriate documentation of age. Children are also allowed to attend for up to 90 days without records or immunizations, and Head Start staff will support families in obtaining the appropriate health and safety records. Under the performance standard, programs may also reserve up to 3 percent of the funded enrollment (at least one spot) for pregnant women and children experiencing homelessness for 30 days. Head Start and Early Head Start Programs are required to hold vacancies that may occur at the beginning of the program year and during the year. Finally, to address family mobility, Head Start programs also provide transition supports to families as they move, by helping families to enroll in a Head Start program closer to their new residency.

Head Start State Collaboration Office shared, children experiencing homelessness are highly mobile and have high rates of absenteeism. Therefore, while the revised enrollment requirements in the Head Start standards help in some cases, many families experiencing homelessness still have difficulty meeting the attendance requirements.

There was also variability across states with regard to CCDF (see textbox below) provisions for children experiencing homelessness. For example, in Idaho and Washington, DC, children experiencing homelessness were deemed categorically eligible for child care subsidy, while other states did not have this provision. Additionally, two of the states interviewed considered housing searches a qualifying activity for families on par with work or educational attainment. Respondents from child care subsidy offices in Idaho and Los Angeles also reported that families experiencing homelessness benefited from having a grace period in which to provide required paper work (e.g., health records, immunizations, etc.), as well as the 12-month eligibility period.

Respondents from child care subsidy offices in North Carolina, Idaho, and Los Angeles indicated that the implementation of the CCDF final rule is still very new. Therefore, many states and localities are still grappling with how to implement these new provisions.

In Oklahoma, respondents were also interested in ways to make child care programs more responsive to the needs of these families. The respondent from a statewide early childhood initiative reported that families experiencing homelessness have a greater need for nonstandard hours of care. To address this need, this respondent suggested the use of license-exempt providers, who can often accommodate these hours. However, the respondent also indicated that it is challenging for providers to obtain a license-exempt status in Oklahoma.

At the child care program level, respondents from Head Start State Collaboration Offices in both Minnesota and North Carolina reported concerns about the availability of ECE. Even though Minnesota allocates funding to serve these children, the funding is not sufficient to prevent waitlists in child care programs. Similarly, the respondent from North Carolina discussed their shortage of high-quality infant and toddler care and long subsidy waitlists. Respondents from a housing advocacy organization in North Carolina and a housing provider in Oklahoma also reported concerns about the limited availability of high-quality ECE programs in their communities.

The respondent from North Carolina also cited the need for provider sensitivity concerning how to support families who are homeless, indicating that the state could support ECE providers by providing more professional development about understanding families' needs and developing partnerships with families.

### **Child Care and Development Block Grant (CCDBG) and Child Care Development Funds (CCDF)**

CCDBG reauthorized the law governing the Child Care Development Fund. Several new provisions under the CCDBG Act of 2014 are aimed at supporting the early learning needs of children experiencing homelessness. States were required to submit a plan outlining how they propose to meet the new requirements under the CCDBG Act. Like provisions under other federal policies, this act requires states to allow families a grace period (at their discretion), after their eligibility is determined, for submitting appropriate documentation of other health and safety requirements, including immunizations. Furthermore, children experiencing homelessness who are determined to be eligible for subsidy services should be permitted to enroll in services during this grace period. States must also use funds to provide targeted outreach and services for families experiencing homelessness. Under the final rules, states must also prioritize families experiencing homelessness for child care services. Additionally, the law requires states to provide training and technical assistance to providers around identification, outreach, and service provision for families experiencing homelessness. The law also requires the coordination of services with early childhood programs serving children experiencing homelessness, and collection of data on children experiencing homelessness who receive child care subsidy.

## Family-level challenges

Respondents indicated that high rates of mobility among families experiencing homelessness make it difficult for them to access high-quality ECE. As the respondent from Washington, DC's Head Start State Collaboration Office reported, families experiencing homelessness are in a constant state of transition as they search for housing and work; these families are often switching between case managers as they move in and out of housing programs or temporary residential arrangements (respondents also indicated a dearth of affordable family housing in Washington, DC). Case managers often support families in accessing ECE. Therefore, any lapse in case management may result in missed or delayed paperwork for ECE programs.

Additionally, a respondent from an education office in Washington, DC reported that parents' level of trust in their child care provider affects ECE use. The respondent stated that families experiencing homelessness can be unfairly judged or stigmatized by providers, which may make families uncomfortable or unwilling to leave their children with providers. Finally, even if a family successfully enrolls in ECE, several barriers remain to consistent attendance. For example, respondents from all six communities mentioned that it may be challenging for families to access affordable and reliable transportation to and from ECE programs.

## Relationship between housing and ECE

Respondents indicated that there is a need to strengthen relationships between ECE and housing programs. In fact, all of the housing providers interviewed for the current study indicated the importance of developing meaningful relationships with ECE providers in order to support families to enroll in ECE. Housing providers from Oklahoma and Idaho, as well as a respondent from a city housing agency in Los Angeles, reported that existing relationships with ECE providers were informal. Furthermore, a respondent from a housing advocacy organization in Minnesota and a researcher in North Carolina reported that even when formal relationships exist (e.g., when the organizations have a memorandum of understanding or other formal agreement in place), there is a need to strengthen the relationships to promote collaboration across systems.

Respondents from Head Start State Collaboration offices in North Carolina and Minnesota stated that they coordinate with other organizations (e.g., early childhood services, housing programs) through formalized work groups to facilitate access to high-quality ECE for families experiencing homelessness. In North Carolina, this coordination was facilitated by the Governor's Council for the Homeless and CCDF planning.

## Community ECE supports

Agencies and organizations offer a variety of supports for accessing ECE to families experiencing homelessness; these range from improving Early Head Start/Head Start and McKinney-Vento policy implementation to providing financial assistance to cover the cost of transportation or care. The respondent from the Head Start State Collaboration Office in North Carolina reported that local school district teams participate in training activities to discuss how they can work together to implement ESSA. Similarly, a respondent representing the statewide Early Childhood initiative in Oklahoma discussed the organization's work to convene state-level officials to improve policies around school readiness and quality early childhood care to support young children and families.

Furthermore, respondents highlighted examples of how their state or community supports ECE providers serving young children experiencing homelessness. A respondent from the Head Start State Collaboration Office in Minnesota reported that they provide additional funding to local Head Start programs in the form of Early Learning Scholarships for high-need families (e.g., low-income families and families with special needs including homelessness). A respondent from the Head Start State Collaboration office in Washington, DC reported that they provide training and other activities to improve teacher sensitivity toward families experiencing homelessness.

Housing providers from Oklahoma and North Carolina, as well as a respondent from a city housing agency in Los Angeles, reported that their programs provide funding, or help families secure funding, for ECE, and have provisions in place to provide additional funds for transportation costs to and from ECE. The housing provider from North Carolina commented that having community-level involvement and commitment to supporting access to ECE is important in facilitating connections to high-quality ECE.

Respondents also indicated that there is much room for growth. More specifically, housing providers from North Carolina and Idaho, as well as a respondent from a city housing agency in Los Angeles, indicated that once a child is in an ECE setting, it is important that their ECE provider is practicing trauma-informed care.<sup>a,13</sup> Across many interviews, respondents expressed concerns about supporting families who have experienced trauma. The respondent from a Los Angeles city housing agency indicated that ECE providers should receive access to training on supporting children experiencing homelessness and trauma.

### Professional development

Respondents indicated that professional development is needed for both the ECE system and the housing system as they work to support the early learning needs of children experiencing homelessness. Respondents from child care subsidy offices in North Carolina, Idaho, and Washington, DC reported receiving training on the barriers that families experiencing homelessness face to enrolling in high-quality ECE. More specifically, the respondent from the child care subsidy office in North Carolina reported that their CCDF staff received training on resources available to families experiencing homelessness. Respondents from child care subsidy offices in Idaho and Washington, DC also reported having trauma-informed care training available to child care staff.

The respondent from a housing advocacy organization in Minnesota indicated that understanding the ECE system can be very challenging for both families and housing staff, and that housing staff need training on recognizing the importance of ECE and the return on investment that ECE provides.<sup>14</sup> Additionally, all of the housing providers interviewed reported that there is very little or no professional development available to housing staff on how to connect families to ECE. Housing providers across all six states and communities in this study also stressed the importance of having more coordinated systems. While respondents discussed the limitations of their relationships with ECE programs, they identified a need to coordinate with these programs to more efficiently serve families with young children experiencing homelessness.

## Summary

The current study indicates that states and communities face many challenges in supporting the ECE needs of families experiencing homelessness. Some of these challenges stem from characteristics of homelessness (e.g., mobility and absenteeism, limited access to transportation, competing demands),<sup>15</sup> whereas others stem from the structure of ECE programs themselves (e.g., availability of care during nonstandard work hours). Furthermore, there are challenges associated with implementing policies that aim to support the early learning needs of these young children.

Ensuring continuity of care for the young children of families who are highly mobile can be challenging. As the respondents indicated, there are not enough affordable, high-quality ECE programs available to families in need. Furthermore, the respondents indicated that high rates of residential instability among families experiencing homelessness make it challenging for these families to both find and maintain a child care arrangement. This is because residential instability puts these families at increased risk for missed days of school due to illness, competing demands, and unreliable transportation.<sup>16</sup> Some federally and state-funded programs have attendance requirements, and chronic absenteeism may affect a family's eligibility for services. Emerging research shows that many children experiencing homelessness, including preschoolers, struggle with chronic absenteeism, meaning they miss 10 percent of school days or more due to excused or unexcused absences.<sup>17</sup>

<sup>a</sup> Trauma-informed care is a structure and treatment framework that involves understanding, recognizing, and responding to the effects of all types of trauma.

Respondents indicated that in addition to high rates of residential mobility, families experiencing homelessness also have nonstandard and variable work schedules. Finding an affordable child care provider who can accommodate irregular, unpredictable, and inflexible work schedules can be difficult.<sup>18</sup>

The respondents pointed toward several potential avenues for states and communities to explore to strengthen their practices and policies to better support the ECE needs of families experiencing homelessness. For example:

- As the respondents reported, strengthening the relationship between the housing and ECE systems may be an important step in facilitating ECE access for families experiencing homelessness. Previous literature discusses the importance of developing shared expertise across systems, which can allow for better service provisions to children experiencing homelessness.<sup>19</sup> In fact, respondents indicated that a first step is to provide professional development opportunities to both ECE and housing providers on the importance of ECE for young children experiencing homelessness.
- Respondents also highlighted the importance of implementing policies that support ECE access for families experiencing homelessness. As the respondents indicated, incorporating provisions that support these families in CCDF state plans is an important first step in ensuring access to child care.
- In addition, the full implementation of the McKinney-Vento Homeless Assistance Act, as amended by ESSA, for all children ages birth to 5 experiencing homelessness (see Appendix A for more information) may be a step toward better access. ESSA provides guidance around the provision of early care and education services for children enrolled in public preschool programs. However, the same rights are not extended to children enrolled in privately funded programs.<sup>20</sup> This is an important consideration given the lack of services for children ages birth to 5 and the challenges parents face when trying to access ECE.<sup>21</sup>
- Similarly, the revised Head Start standards also provide families experiencing homelessness with more flexibility to meet certain enrollment requirements, including several options for providing a letter of residency, and support in providing proof of age, health records, and immunizations. This flexibility and support provided by revisions to the Head Start standards can increase the number of homeless families enrolled in Head Start programs.

While progress has been made, there is still a long way to go to ensure equitable access to high-quality ECE for families experiencing homelessness. This brief, which describes several promising practices and highlights areas where there is room for improvement, is intended to help facilitate access to ECE for this vulnerable population. For additional information on ways that states and communities can facilitate access to ECE for young children experiencing homelessness, please see the resources below.

## Early Childhood Homelessness Resources

In addition to the resources cited throughout this document, the list below includes some specific resources that address identification, outreach, and services offered to families experiencing homelessness.

**Head Start Early Childhood Learning & Knowledge Center. (2018). *Supporting Children and Families Experiencing Homelessness*. Office of Head Start: Washington, DC.** Retrieved from: <https://eclkc.ohs.acf.hhs.gov/family-support-well-being/article/supporting-children-families-experiencing-homelessness>

This resource is an interactive learning series containing six modules to help deepen stakeholders' understanding of family homelessness and relevant policies. Modules include

information about family homelessness, the McKinney-Vento Homeless Assistance Act, identifying and reaching out to families experiencing homelessness, and enhancing program access to children experiencing homelessness.

**Administration for Children & Families & The Ounce. (2017). *Self-Assessment Tool for Early Childhood Programs Serving Families Experiencing Homelessness*. Washington, DC.** Retrieved from: <https://www.usich.gov/tools-for-action/self-assessment-tool-for-early-childhood-programs-serving-families-experiencing-homelessness-hhs>

This toolkit serves as a self-assessment for ECE providers to use to make sure their programs are responsive to the needs of young children experiencing homelessness across five areas: 1) Identification and Support, 2) Removal of Barriers, 3) Responding to Family Needs, 4) Engagement in Strategic Collaboration, and 5) Improving Collection, Reporting and Utilization of Data.

**National Center on Afterschool and Summer Enrichment, National Center on Child Care Subsidy Innovation and Accountability, & Child Care State Capacity Building Center. (2017, October 19). *Supporting Families Experiencing Homelessness* [Webinar].** Retrieved from: <https://childcareta.acf.hhs.gov/resource/supporting-families-experiencing-homelessness-requirements-and-resources>

This webinar explores the requirements for families experiencing homelessness in the CCDBG Act and shares strategies to implement requirements and identify resources available to states and ECE providers.

**Bires, C., Garcia, C., & Zhu, J. (2015). *Supporting Children and Families Experiencing Homelessness: CCDF State Guide*. National Association for the Education of Homeless Children and Youth & The Ounce: Washington, DC.** Retrieved from: <https://www.researchconnections.org/childcare/resources/30902>

The guide assists states in utilizing the CCDF state plan as a way to improve access to ECE for children experiencing homelessness. It provides barriers and challenges and recommends best practices for serving families experiencing homelessness. It also summarizes CCDBG Act requirements related to homelessness.

**Office of the Deputy Assistant Secretary for Early Childhood Development & Administration for Children and Families. (2014). *Promising Practices for Children Experiencing Homelessness: A Look at Two States*. U.S. Department of Health & Human Services: Washington, DC.** Retrieved from: <https://www.researchconnections.org/childcare/resources/27988>

This brief provides an overview of the effects of homelessness on young children, federal policies, and case studies of two states (MA and OR) that have implemented innovative policies to improve outcomes for young children experiencing homelessness.

# Appendix A: Policies that Support ECE Enrollment of Children Experiencing Homelessness

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A network of federal, state, and local policies provides a framework of support for families experiencing homelessness.<sup>b</sup> This appendix describes some of the major policies that work to support the educational rights of children experiencing homelessness.

## Federal policies

### McKinney-Vento Homeless Assistance Act<sup>c</sup>

While housing policy does not explicitly address the early learning needs of children experiencing homelessness, the McKinney-Vento Homeless Assistance Act, reauthorized in 2001, provides funding for a variety of homeless service initiatives and establishes the educational rights of children and youth experiencing homelessness. The McKinney-Vento Homeless Assistance Act applies to state education agencies responsible for the removal of barriers to accessing education, including publicly funded preschool,<sup>d</sup> in order to facilitate enrollment and attendance of students experiencing homelessness. While typically thought of as a K-12 policy, the Every Student Succeeds Act (discussed in more detail below) amended this legislation in 2015 to more explicitly address the needs of preschool-aged children. This legislation also promotes continuity of education for children and youth experiencing homelessness by offering them the option of remaining in their school of origin<sup>e</sup> even if they do not currently reside in the school district where the school of origin is located. Local education agencies are responsible for designating a McKinney-Vento liaison for their district.<sup>22</sup> The liaison should participate in professional development offered by state education agencies, identify children experiencing homelessness in their district, and coordinate outreach and services with other entities and agencies. Under the Every Student Succeeds Act, publicly funded preschools must have provisions in place to allow families experiencing homelessness a grace period for providing documentation such as birth certificates, health records, and immunization records. Additionally, given that families experiencing homelessness may have difficulty providing required documentation such as a letter of residency, the local education agency must offer alternatives for submitting this paper work (e.g., a letter from the shelter where the family resides or a self-declaration).

### Every Student Succeeds Act (ESSA)<sup>f</sup>

The McKinney-Vento Homeless Assistance Act is cross-referenced in Title IX, Part A of the Every Student Succeeds Act (ESSA). Therefore, ESSA, which was signed into law in December 2015, was concurrently reauthorized with the McKinney-Vento Homeless Assistance Act, with an increased focus on the needs of young children experiencing homelessness. ESSA added language about preschools to the school of origin<sup>g</sup> definition to make the McKinney-Vento Homeless Assistance Act more inclusive of preschool-aged students in regard to school stability and the provision of transportation. In addition, the ESSA amendments clarified the local liaison's role in ensuring that children and families experiencing homelessness have access to all needed early childhood services offered to youth who are stably housed by local education agencies such as Head Start, Early Intervention Program for Infants and Toddlers with Disabilities (Part C of Individuals with Disabilities Education Act [IDEA]), and other publicly funded preschool programs. The ESSA amendments also increased

<sup>b</sup> It should be noted that several of the following policies also apply to children awaiting foster care placement.

<sup>c</sup> More information about the McKinney-Vento Homelessness Assistance Act can be found here: <https://www2.ed.gov/policy/elsec/leg/esea02/pg116.html>.

<sup>d</sup> Publicly funded preschools, for children birth to age 5, operated by a local education agency or receiving public funds.

<sup>e</sup> The school the student attended prior to his/her homelessness experience.

<sup>f</sup> More information about the ESSA Act can be found here: <https://www.ed.gov/essa?src=ft>.

<sup>g</sup> More information about the McKinney-Vento Homelessness Assistance Act can be found here: <https://www2.ed.gov/policy/elsec/leg/esea02/pg116.html>.

language about collaboration and coordination with other social services such as child care providers and operators of emergency and transitional housing facilities.<sup>23</sup>

### Head Start<sup>h</sup>

The Improving Head Start for School Readiness Act was signed into law in December 2007; in part, this act required the identification as well as the categorical eligibility and prioritization of children and families experiencing homelessness in both Head Start and Early Head Start programs. The 2016 Head Start Program Performance Standards (HSPPS) include several standards (aligned with McKinney-Vento and ESSA) addressing barriers to enrollment for children experiencing homelessness. First, families experiencing homelessness have several options for producing a letter of residency (required by Head Start for enrollment): They may provide a letter from their housing program or a letter from the family they are staying with if doubled-up, or they can provide a self-declaration. Similarly, if providing proof of age is a barrier to enrollment, Head Start will allow families to enroll their children while they support them in accessing appropriate documentation of age. Children are also allowed to attend for up to 90 days without records or immunizations, and Head Start staff will support families in obtaining the appropriate health and safety records. The performance standards also reserve up to 3 percent of the funded enrollment (at least one spot) for pregnant women and children experiencing homelessness for 30 days. Head Start and Early Head Start Programs are required to hold vacancies that may occur at the beginning of the program year and during the year.<sup>24</sup> Finally, to address family mobility, Head Start programs also provide transition supports to families as they move, by helping families to enroll in a Head Start program closer to their new residency.

### Individuals with Disabilities Education Act (IDEA)<sup>i</sup>

The Individuals with Disabilities Education Act (IDEA) of 2004 provides free, appropriate public education and services to children birth to age 3 (IDEA Part C) and ages 3 to 5 (IDEA Part B) through age 21 with disabilities; this includes the receipt of specially designed preschool instruction including speech and language services, audiology, health or social work services, home visits, physical or occupational therapy, and transportation. IDEA intersects with the McKinney-Vento Act when addressing children with disabilities who are also experiencing homelessness. IDEA requires all states to identify, locate, and evaluate all children (birth to 21) with disabilities, including children who are experiencing homelessness. Part B outlines that all assessments should be timely and calls for continuity of services for children who may be highly mobile. Part C requires that all services must be provided to infants and toddlers and can be provided wherever the child spends the most time.<sup>25</sup> Under these acts, any state receiving IDEA funds must make sure that McKinney-Vento Act standards are met for children with disabilities who are also experiencing homelessness. Each state receiving IDEA funding must also have state and local McKinney-Vento personnel on their State Advisory Panel<sup>j</sup> when providing policy implementation and guidance to the state.<sup>26</sup>

## State/Community policies

### Child Care and Development Block Grant (CCDBG)<sup>k</sup> and Child Care Development Funds (CCDF)

CCDBG reauthorized the law governing the Child Care Development Fund. There are several new provisions under the CCDBG Act of 2014 aimed at supporting the early learning needs of children experiencing homelessness. States were required to submit a plan outlining how they propose to meet the new requirements under the CCDBG Act. Like provisions under other federal policies, this act requires states to allow families a grace period (at their discretion) after their eligibility is determined to submit the appropriate documentation of other health and safety requirements,

<sup>h</sup> More information about Head Start Program Standards can be found here: <https://www.acf.hhs.gov/ohs/policy>.

<sup>i</sup> More information about the IDEA Act can be found here: <https://sites.ed.gov/idea/>.

<sup>j</sup> State Advisory Panels ensure statewide coordination and collaboration among the wide range of early childhood programs and services in the State, including child care, Head Start, IDEA preschool and infants and families programs, and pre-kindergarten programs and services.

<sup>k</sup> More information about the CCDBG can be found here: <https://www.acf.hhs.gov/occ/resource/ccdbg-of-2014-plain-language-summary-of-statutory-changes>.

including immunizations. Furthermore, children experiencing homelessness who are determined to be eligible for subsidy services should be permitted to enroll in services during this grace period. States must also use funds to provide targeted outreach and services for families experiencing homelessness. Under the final rules, states must also prioritize families experiencing homelessness for child care services. Additionally, the law requires states to provide training and technical assistance to providers around identification, outreach, and service provision to families experiencing homelessness. The law also requires the coordination of services with early childhood programs serving children experiencing homelessness, and data collection on children experiencing homelessness who receive child care subsidy.

### **Title I, Part A, Elementary and Secondary Education Act (ESEA)<sup>1</sup>**

Title I, Part A of ESEA provides financial assistance to local education agencies (LEA) or schools with high percentages of low-income children enrolled. Title I funds can also be used for preschool services within an LEA or a school to promote the development and school readiness for high-risk children. Under Title I, children experiencing homelessness are categorically eligible to receive Title I services, although they are selected for targeted assistance based on academic need.

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<sup>1</sup> More information about Title I, Part A ESEA can be found here: <https://www2.ed.gov/programs/titleiparta/index.html>.

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