

UPDATED RECOMMENDATIONS FOR THE
**EARLY CHILDHOOD
ACTION PLAN RELATED
TO HOMELESSNESS
AMONG YOUNG
CHILDREN**

OCTOBER 2021

YAY BABIES!



RECOMMENDATIONS FOR THE EARLY CHILDHOOD ACTION PLAN RELATED TO HOMELESSNESS AMONG YOUNG CHILDREN

Yay Babies! is a work group in NC that seeks to ensure NC children birth to five experiencing homelessness receive early intervention services for developmental and mental health needs and have access to high-quality, affordable child care.

Yay Babies' objectives are consistent with the recommendations presented in the US DHHS *Policy Statement on Meeting the Needs of Families with Young Children Experiencing and At Risk of Homelessness*. Participants in the advocacy group include professionals representing a variety of homeless services and early childhood program providers:

- Durham Families Together
- Family Promise of Wake County
- Families Moving Forward
- NC Head Start Collaboration Office
- NC Child Care Health and Safety Resource Center (University of North Carolina)
- NC Child Care Resource and Referral Council (Child Care Services Association, Child Care Resources, Inc., Southwestern Child Development, Inc.)
- NC Coalition to End Homelessness (NCCEH)
- NC DHHS, Division of Child Development and Early Education
- NC DHHS, Division of Public Health, Early Intervention Branch
- NC DHHS, Emergency Services Grant
- NC Homeless Education Program
- NC Infant Mental Health Association
- NCCEH Data Center
- NC Partnership for Children (Smart Start)
- Partners for Impact
- Passage Home, REACH (Resilience, Empowerment, and Access for Children Experiencing Homelessness)
- Salvation Army of Raleigh, Project CATCH
- SchoolHouse Connection
- Wake County Smart Start

The DHHS approached Yay Babies! to provide recommendations related to data for Goal 4 of the Early Childhood Action Plan: *Babies, toddlers, young children and their families across North Carolina will have access to safe, secure, and affordable housing.*

Yay Babies! was also given the opportunity to include recommendations related to data on children experiencing homelessness for other ECAP Goals deemed appropriate. Yay Babies! prepared the following recommendations for the Early Childhood Action Plan.

Following an Executive Summary, the recommendations are categorized into three main headings: Section I. Data Recommendations for ECAP, Section II. Advocacy/Policy, and Section III. Activities/Strategies.

EXECUTIVE SUMMARY

I. Data Recommendations for Early Childhood Action Plan:

1. Add a third 2025 target to Goal 4: By 2025 increase by (x) percentage of young children experiencing homelessness that receive stable permanent housing.
2. Clarify data sources for Goal 4 Targets and provide definition of homelessness for each target.
3. Edit sub-target 2: Number of homeless children participating in education programs to Number of homeless children participating in education and early intervention programs.
4. Add a sub-target to Goal 8: High Quality Early Learning related to the percentage of children experiencing homelessness whose families receive child care subsidies and are enrolled in 4- or 5-star centers and homes.
5. Add a sub-target to Goal 9: On Track for School Success related to the percent of children 0-5 experiencing homelessness that receive developmental screening and treatment.
6. Ensure that all state-funded systems use McKinney Vento definition and that data-related housing questions are uniform across systems when collecting data.
7. Dedicate a DHHS Division/office to collect relevant data related to child and family homelessness, and request the data annually.

II. Advocacy/Policy Recommendations:

1. DHHS/Governor advocate for the proposed federal law, HR 2001, Homeless Children and Youth Act, to change the U.S. Department of Housing and Urban Development definition of homelessness so that it aligns with the U.S. Department of Education definition.
2. ECAP authors advise (a) Emergency Solutions Grant (ESG) office to lead prioritizing of children ages birth to 8 for permanent stable housing; advise ESG office to consider promotion of Early Childhood Assessment Tool for Family Shelters, and (b) HUD to make children a priority in funding by following set of recommendations provided herein.
3. DHHS recommend all Continuums of Care prioritize housing for families with children birth to 8.
4. For child care sector: Change in child care subsidy rule to allow presumptive eligibility for families experiencing homelessness. DHHS recommend contracted slots for homelessness in child care programs based on statewide needs assessment. DHHS recommend increasing the amount of subsidy funds allocated for families experiencing homelessness.
5. For health and homelessness services providers: A set of recommendations is provided herein to increase identification of families with young children experiencing homelessness and referring them to the appropriate breadth of services.

III. Actions/Strategies:

1. Provide non-regulatory guidance regarding what data is needed statewide and how data collection can be improved.
2. Recommend that a representative from Yay Babies! or Early Childhood community who is experienced and knowledgeable about the issues regarding childhood homelessness serve on the NC Interagency Council for Coordinating Homeless Programs.
3. Yay Babies! provide support and guidance on cross-sector training.



I. DATA RECOMMENDATIONS FOR EARLY CHILDHOOD ACTION PLAN:

1) Add a third 2025 target to Goal 4: *By 2025 increase percentage of young children receiving stable permanent housing.*

The data for Goal 4 can be obtained through North Carolina's Homeless Management Information Systems (HMIS) which are used by homeless services providers throughout the state and are required to be used by all agencies receiving funding from the U.S. Department of Housing and Urban Development (HUD). HUD has divided the state into Continuums of Care (CoCs) that are responsible for managing their homeless systems. Each community, or group of communities that are defined as a CoC, may apply for funds through HUD Continuum of Care Competition Homeless Assistance Award. CoC's may also apply for Emergency Solutions Grant (ESG) funding, some of which is allocated to the state and some of which is allocated directly to the CoC. CoCs work with local businesses, agencies, and relevant entities to end homelessness in their communities by providing funding to quickly re-house homeless individuals and families; referring individuals/families to programs serving the homeless; and promoting the stability of individuals and families experiencing homelessness. [In 2020, NC received \\$9,929,994 in funding for Continuums of Care across the state.](#)

Under the Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH), HUD requires all CoCs to implement coordinated entry (CE). CE is a system that standardizes how people access housing and homeless services. Any CoC or ESG funded programs that shelter homeless individuals or families are required to enter standard information about those individuals and families into the Homeless Management Information System (HMIS). HMIS is a locally administered data system used to record and analyze client, service, and housing data for individuals and families who are homeless or at risk of homelessness. The scope of the statewide system of CoCs makes HMIS a valuable data source for identifying homeless families. In North Carolina there are two sources for HMIS data:

1. NC Coalition to End Homelessness' HMIS called HMIS@NCCEH – includes 3 CoCs (1. Durham, 2. Orange and 3. Balance of State which includes 79 rural counties)
2. NC Homeless Management Information System (NCHMIS) – includes 8 CoCs (1. Winston-Salem and Forsyth County; 2. Asheville/Buncombe; 3. Greensboro/High Point/ Guilford; 4. Charlotte/Mecklenburg; 5. Wilmington/Brunswick; 6. Gastonia/Cleveland/ Gaston/Lincoln; 7. Fayetteville/Cumberland; 8. Northwest NC). Michigan Coalition Against Homelessness is the data vendor for the NCHMIS.

There are many strengths for using this data source. First, using a standard federal HUD definition, it is a count of the number of *literally homeless* individuals/families in most North Carolina counties. The data are available by age, family size, the date on which individuals/families enter the HMIS system, and the date on which individuals/families exit the system to permanent housing vs. those returning to homelessness. The data can also be disaggregated for other data sets. **Because HMIS data includes the number of individuals exiting the system to permanent housing in all counties in North Carolina, it is the best data source for the recommended target.**

However, there are some caveats associated with this data source. First, most counties' data are based on the HUD definition of homelessness which does not include the count of homeless children and youth. The McKinney-Vento definition of homeless children and youth includes individuals up to the age of 18 that are staying with other families and those in families paying for their own hotel rooms or other temporary living arrangements; these children and youth are not counted in the HMIS system, nor is there any way to track their parents/caregivers who fall outside both the HUD and McKinney-Vento definitions. Second, HUD is currently considering policy changes related to living situations that meet their criteria for homeless. Any changes in definitions will impact the degree to which we can rely on the data to determine changes in prevalence of homelessness over time. Third, families may be entered into HMIS twice if they are receiving services from two programs because the two HMIS systems are not integrated. Fourth, members of families in DV shelters and families headed by parents exiting substance abuse programs without housing are not entered into HMIS. Finally, some shelters that operate outside of HMIS (e.g., many domestic violence shelters) are not reporting data into any statewide system.

Related recommendations for DHHS:

- Gather baseline data from the HMIS in SFY 2020 related to the number of young children leaving the system due to securing permanent or stable housing and those that do not (i.e., they return to homelessness).
- Annually or bi-annually request data from the two HMIS data sources. These data are reported quarterly to HUD.
- Request from the two HMIS data sources HMIS and NCCEH the number of children experiencing homelessness by each age from 0 to 12 and the number of children exiting the HMIS due to families securing stable housing. Though it is not a part of the ECAP, it is also recommended that the same age data are gathered through age 12 to show the need for services and funding to support that age range.

2) In Goal 4: clarify the data sources for the Targets and add the definition of homelessness used for each target. Consider including the following information.

Target 1: Add a statement to explain the formula that the Administration for Children and Families (ACF) used to determine the number of children under age 6 experiencing homelessness. Calculations for the number of homeless children were based on a methodology developed by ACF which combines U.S. Department of Education data from the Head Start and McKinney Vento Liaisons under age 5/age 5, if ineligible for K. See Appendix I, the Data Sources and Methodology section in the *Early Childhood Homelessness in the United States: 50 State Profile*, for a detailed explanation of the formula.

Target 2: Add a statement to explain how the numbers given were determined. Explain why the number of children experiencing homelessness is significantly less than the number reported in Target 1. This number includes the number of children served in the Department of Education programs through the McKinney-Vento program. Currently, the number primarily reflects the number of school-aged children enrolled in public schools who have been identified by homeless education liaisons as homeless. These liaisons are also required to identify and count younger siblings of school-aged children, but they are not consistently documenting siblings; thus homeless children birth to age five are not reliably counted.

New Target 3: Add a statement to explain why the number of children experiencing homelessness counted is significantly less than the number in Target 1 and 2 (i.e., Target 3 data is based on HMIS collected data, which fails to use the more appropriate definition of homeless children and youth set forth in federal law in the McKinney-Vento Education Subtitle to define homeless children ages 0-8; instead that system uses the HUD definition of homelessness).

Potential data sources for identifying children experiencing homelessness. Strengths and limitations of each: **Yay Babies! recommends collaborations with all entities that collect data to ensure consistent, uniform data collection related to housing and use of the McKinney-Vento Act and HUD definitions of homeless.**

Head Start/Early Head Start

Strengths – This national standardized data source includes attendance and identifies the number of children enrolling in Head Start/Early Head Start who enter “homeless” to meet categorical eligibility as a reason for Head Start enrollment. Grantees have the capacity to create a data report using the national Head Start Enterprise System. The data are reported out annually in a variety of formats at the national, state, and grantee level and a number of data points include homelessness and the demand for housing assistance among the family services offered by Head Start grantees. A strength of these data is that they are historical, so trends can be monitored. In addition, Head Start is working towards having all public preschools in PowerSchool (provides a way to track attendance) but use of PowerSchool is not currently a requirement. The PowerSchool attendance data will be available Fall 2019; however, it might be unreliable for a while.

Limitations/Gaps – Though Head Start/Early Head Start gathers the data described above, these data are not currently used at the local or state level for decision-making.

NC FAST/Child Care Subsidy

Strengths – This data source includes the number of families experiencing homelessness that receive Child Care Subsidy.

Limitations/Gaps – Number of children in families that receive subsidy is not documented. Subsidy is limited primarily to working families, so the count likely excludes most homeless families and children. As is true for other data sources, housing status is only determined at the time of the application, so homelessness that occurs after enrollment is not recorded.

NC Pre-K

Strengths – This data source includes attendance. In Both NC Pre-K Kids (tracks attendance) and NC Pre-K Application (includes every child’s application), a question is asked about the child’s current housing status, indicating whether or not the family is homeless.

Limitations/Gaps – Although attendance is tracked, it is not possible to sort attendance data by homelessness status. The system is being revised so that it will have capacity for statewide reporting in one or two years.

ECIDS

Strengths – Central location for data for multiple systems [Child Protective Services, Exceptional Children (IDEA Part B)], Infant Toddler Program (IDEA Part C), NC Pre-Kindergarten, NC FAST/Subsidized Child Care Assistance, Food Nutrition Services, Head Start/Early Head Start.

Limitations – Exceptional Children (IDEA Part B) does not currently track homelessness even though they are within the NC Department of Education, where counts are required via the McKinney-Vento Act. Further, ECIDS does not currently seem active, as the latest data on their website is from 2014-15.

211counts.org

2-1-1 Counts is the data source for NC citizen's calls to 2-1-1 regarding persons seeking shelter/housing.

Strengths – Counts the number of people calling to ask for assistance with securing shelter/housing. Currently working to be the entry for Coordinated Entry statewide; if the 2-1-1 staff members identify the caller as literally homeless (using the HUD definition), the staff member begins entering the family into the HMIS system by asking initial questions in the HMIS screening process. If appropriate, the staff member then directs the caller to a local shelter. Shelter staff then conduct the Vulnerability Index – Service Prioritization Decision Assistance Tool assessment (VI SPADT). Though the VI SPADT is a score per family, not per family member, data derived from that tool can be disaggregated by child age (birth-5, 6-11, 12-18).

Limitations/Gaps – As is true for many data sources, there is a possibility of duplicative data. As is the case with most other data sources, 211 counts will not include many of the children and youth who fit the more inclusive definition of homelessness based on the McKinney-Vento Act.

NC CARES 360

Strengths – Data will be collected on who is being referred for housing services. There is a data team verifying resources with text and chat capabilities. A data repository is maintained to integrate resource directories across the state to share resource data. There is a shared technology platform that enables health care and human service providers to send and receive secure electronic referrals, communicate in real-time, securely share client information and track outcomes. A community engagement team is working with community-based organizations, social service agencies, health systems, independent providers and others to create a statewide coordinated care network.

NC CARES 360 - Cont'd

Limitations/Gap – This reporting/data collection system is not yet active; NC CARES 360 is currently determining how to connect their system with 2-1-1/HMIS data.

Yay Babies! recommends collaborations with data sources to ensure consistent, uniform data collection related to housing and use of the McKinney-Vento Act and HUD definitions of homeless.

3) Revise sub-target 2: From *“Number of children experiencing homelessness participating in education programs”* to *“Number of children experiencing homelessness who are participating in education and early intervention programs”*.

Add the following early intervention programs to the existing list (i.e., High quality early care and learning; NC Public Schools, Pre-K-3rd Grade)

- NC Early Intervention
- NC Infant-Toddler Program/CDSAs (Ages 0-2)
- NC Public School, Pre-K (which includes ages 3, 4, & 5-year-old children ineligible for kindergarten)
- Consider home visiting programs as another addition, noting whether there is a home visiting program in the given county

4) Add a sub-target to Goal 8: *High Quality Early Learning* related to percent of children experiencing homelessness whose families receive childcare subsidy and are enrolled in 4- or 5-star centers and homes.

- Ages 0-2
- Ages 3-5
- Ages 6-8

5) Add a sub-target to Goal 9: *On Track for School Success* related to the percent of children 0-5 experiencing homelessness that receive developmental screening and appropriate intervention.

6) Ensure that all state-funded systems use McKinney Vento definition and that data-related housing questions are uniform across systems when collecting data.

- Yay Babies! Will provide a set of recommended questions and procedures to be used across the state to identify families experiencing homelessness.
- Recommend a dialogue to begin collaboration between state-level NC Homeless Education Program (McKinney Vento) and state-level HUD/ESG offices related to data collection and data sharing.

7) Dedicate a DHHS Division/office to collect various data related to child and family homelessness, and then request the following data annually:

- Require that each program in Early Childhood Integrated Data System (ECIDS) track homelessness. For each of the programs included in Early Childhood Integrated Data System (ECIDS), ensure homeless data is included in the data extract.
- Yay Babies! recommends CDSA document homelessness and annually or biannually report to the DHHS Secretary the housing status of their clients. Research shows that many children experiencing homelessness have significant developmental delays. After screenings and identification, many are referred to the CDSA for services. However, since housing status is not assessed or recorded by CDSA staff, there is no statewide central point of data collection regarding the numbers of children experiencing homelessness in need of early education intervention services. Optimally, data would be reported using both the McKinney-Vento and HUD definitions for data records and to ensure appropriate benefits are available based on different eligibility criteria.
- Yay Babies! recommends 2-1-1 report to DHHS Secretary annually or biannually (a) the number of individuals who call to seek assistance with housing and (b) child data related to housing status by age [Numbers at each age from 0 to 12]. Increase funding for 2-1-1 staff to support reporting. The definition of homelessness used to compile the 2-1-1 data will be consistent with that reported by HMIS per telephone interview with Heather Black, 2-1-1 State Director at United Way North Carolina.
- Recommend all state agencies serving children 0-5 and 6-12 track homelessness using the McKinney Vento definition and the recommended identifying residency questions.

II. ADVOCACY/POLICY RECOMMENDATIONS:

1) DHHS/Governor advocate for the proposed federal law, HR 2001, Homeless Children and Youth Act, to change the U.S. Department of Housing and Urban Development definition of homelessness to the McKinney Vento definition, so that it aligns with other systems and programs that use the McKinney Vento definition.

Rationale: The U.S. Department of Housing and Urban Development (HUD) definition of homelessness is contained in the Homeless Emergency Assistance and Rapid Transition to Housing Act. The definition affects who is eligible for various HUD-funded homeless assistance programs, such as Permanent Supportive Housing, Rapid Re-Housing, emergency shelter, transitional housing and outreach. The HUD definition is also used by Continuums of Care (CoC) located in most NC counties (in NC, the Balance of State is a CoC which incorporates 79 counties using regional committees). Lastly, the HUD definition is also used by NC 2-1-1. NC 2-1-1's goal is to be the entry for Coordinated Entry (CE) entry statewide, according to Heather Black, State Director of 2-1-1 System. 2-1-1 is using the HUD definition since they have collaborated with some CoCs to, upon entry, enter initial information into the HMIS about individuals/families before sending them to a shelter for the more detailed interview/screening.

Most HUD programs exclusively use Category 1, "literally homeless", as a criterion for services due to limited funding. Additional funding resources may be necessary with a broadening of the definition from HUD to McKenny Vento.

The HUD definition has 4 Categories of homelessness:

1 — *Literally homeless* includes those living on the streets; living in a shelter, transitional housing or a hotel/motel paid for with public or charitable funds; living in a place not meant for human habitation, such as a car or encampment or coming out of an institutional setting where they have been for 90 days or less, and before which they were in one of the situations above.

2 — *At imminent risk of homelessness* includes households that will lose their primary nighttime residence within 14 days (e.g., hotel or doubled up arrangement); no other housing has been identified and the household has no other resources to maintain housing moving forward.

3 — Homeless according to other Federal definitions. Unaccompanied youth or families that meet the homeless definitions of other Federal statutes, AND no lease or other "official" permanent housing in 60 days, AND 2+ moves in the last 60 days, AND likely to face persistent instability.

4 — *Fleeing or attempting to flee domestic violence* or other related dangerous conditions; AND No other housing identified, AND No other resources available.

The McKinney Vento definition of homelessness is broader than the HUD definition. Homelessness means individuals who lack fixed, regular, and adequate nighttime residence and includes children in emergency shelters, motels, hotels, trailer parks, cars, parks, public spaces, abandoned buildings, migratory children, and those sharing houses with other persons due to loss of housing, economic hardship, or similar reason. State report cards are required to include disaggregated information on the graduation rates and academic achievement of identified homeless children and youth.

Entities/Programs that use this definition include the federal Administration for Children and Families, early childhood lead agencies and all programs conducted by that agency; US Department of Education; NC public schools; Title I eligibility; the Individuals with Disabilities Education Act rights and services; and NC Juvenile Justice system.

Organizations, education entities, and government agencies using different definitions for homelessness make it difficult to get an accurate count of the number of individuals and families experiencing homelessness across the state. Without an accurate count to show need, it is hard to advocate in the legislature for additional funding. A consistent definition for homelessness would help with tracking individuals experiencing homelessness and help entities be able to easily identify the programs, services and housing for which individuals experiencing homelessness are eligible. *A consistent definition will be needed to evaluate the impact of the Early Childhood Action Plan.*

2) Recommend ECAP authors advise:

- a) NC DHHS, HUD funded Emergency Solutions Grant (ESG) office, to take the lead in prioritizing permanent stable housing for children ages 0 to 8. List children in the ESG grant funding priorities. In addition, advise ESG office to consider ways to promote the use of the ACF, Early Childhood Assessment Tool for Family Shelters such as giving shelters that use the tool points.
- b) US Department of HUD to make children a priority in funding.
 - Advocate with US Congress to prioritize children 0-8 in Continuum of Care policies with regards to housing placement.
 - In rules about shelters, address children by requiring shelters to use the [Early Childhood Self-Assessment Tool for Shelters](#).
 - Ask HUD to consider posting the updated tool on their website for use by shelters.

3) DHHS recommend all CoCs prioritize housing for families with children 0 to 8 in their efforts to place families in housing in each county.

4) For child care sector:

- a) DHHS and DCDEE advocate for change in child care subsidy rule (special set aside) to allow presumptive eligibility for families experiencing homelessness. Cite other states which require presumptive eligibility (e.g., South Carolina).
- b) DHHS recommends contracted slots for homelessness in child care programs based on statewide needs assessment (e.g. areas of high poverty).
- c) DHHS recommends increasing the amount of subsidy funds allocated for families experiencing homelessness.
- d) Recommend early childhood programs to use the [Self-Assessment Tool for Early Childhood Programs Serving Families Experiencing Homelessness](#). Consider adding a specialization star rating “plus” to indicate readiness to provide trauma-informed housing-sensitive child care and provide a stipend for achieving the “plus” rating.
- e) Waive co-pay or provide funds to cover this cost for families experiencing homelessness.

5) For health and homelessness services providers:

- a) Recommend inclusion of housing navigators (or, more broadly, basic needs/social determinants of health navigators) on medical teams.
- b) Recommend emergency departments in medical facilities to ask questions of families with children with asthma, obesity, and other medical conditions known to be associated with social determinants of health about their housing situation.
- c) Recommend DHHS convene regional meetings for local homeless service providers, early childhood professionals, and interested parties to discuss including McKinney Vento data along with HUD HMIS data and consistent use of both definitions of homelessness.

III. ACTIONS/STRATEGIES:

1) Provide non-regulatory guidance regarding what standardized/consistent data is needed statewide and how data collection can be improved. These are preliminary considerations; a more comprehensive document may be provided by Yay Babies!.

- Percent of children 0-5 who are homeless in NC in a year.
- Percent of families/children 0-5 who exit and find permanent housing (Both HMIS systems have this data). Standard reports do not include this data; however, a report with this specific information can be requested.
- Recommend entities track attendance and homelessness in early childhood programs. Public Schools are already required to track attendance due to McKinney Vento requirements for Pre-K through grade 12.
- Recommend tracking mobility data (e.g., move from one address to another). This is available from public schools and likely available from childcare subsidy also.
- Number of families with young children who are evicted.
- Uniform age groupings – [0-5], [6-12], [13-18] based on data entry into homelessness.
- Analysis of equivalent age groupings between the different data sets. Specifically, analysis between HMIS Data and Administration for Children and Families (Head Start/Early Head Start and McKinney Vento) data to understand the scale of differences.
- Determine whether families who participate in rapid rehousing programs return to homelessness or remain stably housed (“stably housed” to be defined). This can possibly be determined by CoC or NCCEH data.
- Determine whether children are stable in their educational setting (consistent with CCDF continuity of care goals to help parents have sustained access to subsidy/child care).
- Determine whether children experiencing homelessness are developing/learning on pace with non-homeless children.
- Identify data from one data source that can be compared to data from other data sources.
- Track whether young children experiencing homelessness have equal access and participation in quality early childhood programs as stably housed young children.

2) Recommend that a representative from Yay Babies! or Early Childhood community who is experienced and knowledgeable about the issues regarding childhood homelessness serve on the NC Interagency Council for Coordinating Homeless Programs.

3) Yay Babies! provide support and guidance on cross-sector training to help providers in child and family-serving agencies learn how to identify homeless children among the clients served by their organizations and collect useful data that is consistent across agencies. These providers may include:

- 2-1-1
- Early Childhood Educators
- Educators
- State Agencies
- Private hospitals and pediatricians
- Health Departments
- State human services agencies
- County Department of Social Services (Child Care Subsidy staff)
- Private and public Mental Health providers



FOR MORE INFORMATION

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