

OUT OF SIGHT, OUT OF MIND:

How HUD's Inaccurate Definition of Homelessness Harms Children, Youth & Families

WHY IS HUD'S DEFINITION OF HOMELESSNESS INACCURATE?

HUD's definition of homelessness does not include children and families who have lost their homes but are temporarily staying in motels or with other people because other shelter is not available or appropriate.

DO OTHER FEDERAL DEPARTMENTS HAVE MORE ACCURATE DEFINITIONS OF HOMELESSNESS?

Yes. Several federal departments have definitions of homelessness that include homeless families and youth who are temporarily "doubled up" or in motels, including:

- Department of Education
- Department of Health and Human Services
- Department of Justice
- Department of Agriculture

These families and youth are not "at risk of homelessness;" they have lost their homes due to an event – eviction, foreclosure, family crisis, or other reason – but cannot find available and appropriate shelter. For these reasons, they are staying in temporary situations that jeopardize child and youth health and development. The fact that shelter is not available or appropriate does not mean that these families and youth are not homeless, or that their situation is not urgent.

WHY DO HOMELESS FAMILIES AND YOUTH DOUBLE-UP, OR STAY IN MOTELS?

- There is no family or youth shelter in the community.
- Shelters in the community are full.
- Shelter policies often prohibit families with boys older than 10, or families with two parents, or families with large numbers of children, or unaccompanied youth under age 18. Families are forced to seek alternate arrangements in order to keep their family intact, and youth who are homeless on their own must look elsewhere for a place to stay.
- Shelters have time limits on length of stay; time may run out, but the problems that lead to homelessness have not been resolved, so families and youth still lack a stable place to stay.
- There is no one with whom families can double up, so they stay in motels instead; these motels are not suitable environments for children.
- Sleeping in cars or on the streets is a child protective service issue in many places. Families fear losing custody of their children and will seek alternate arrangements to keep their family intact.
- Families fear harm will come to their children if they sleep outside.
- Unaccompanied homeless youth fear violence if they sleep outside.

HOW MANY CHILDREN AND YOUTH ARE LEFT BEHIND BY HUD'S DEFINITION?

Nearly 600,000 children and youth are considered homeless by other federal agencies, but not by HUD. In fact, more than 60 percent of the homeless students identified by public schools are ineligible for HUD Homeless Assistance. This is problematic for the reasons stated below.

WHAT IS THE IMPACT ON THESE CHILDREN, YOUTH, AND FAMILIES OF BEING EXCLUDED FROM THE HUD DEFINITION OF "HOMELESS?"

They do not receive support from local, state, or other federal funding because communities are misled to believe that there are fewer homeless children, youth, and families than there are. The current and proposed practice of excluding homeless families and youth who are temporarily doubled up or in motels makes HUD's definition of homelessness inaccurate. It results in the exclusion of these homeless families and youth from HUD homeless counts, and therefore misleads communities to believe that there are fewer homeless families and youth than there really are. Communities thus lack awareness and do not allocate resources to meet their needs. When information about the extent of child and youth homelessness is made public, new resources and partners are brought to the table. These new resources result in tangible benefits for children, youth, and families, including shelters, tutoring, and other services. Yet the HUD homeless count, which is taken to be the "official" community count of homelessness, does not include doubled-up and motel children and youth.

They may be denied access to education and critical services such as transportation, putting them at continued risk for experiencing homelessness as adults. The HUD definition of homelessness undermines the work of public schools. School principals and other administrators often challenge the eligibility of children who are in doubled-up homeless situations for McKinney-Vento education rights because they do not believe these children are

“really homeless.” Despite the clear inclusion of children in temporary doubled-up situations in the education subtitle of the McKinney-Vento Act, the HUD definition reinforces this notion that these families are not “truly homeless” and allows stereotypes about homelessness and myths about the shelter system to prevail. If the HUD homeless assistance program, which is the largest federal homeless program, were to include children in temporarily doubled-up and motel situations in its definition of homelessness, it would create consistency across federal programs and thus help to eliminate these misperceptions about who is homeless, ultimately facilitating greater school access for all homeless children.

Specific examples:

- A regional school district hired a consulting firm to make recommendations for policy and practice on homeless children’s transportation. The first recommendation was to lobby Congress to change the education definition to match the HUD definition in order to limit eligibility for McKinney-Vento transportation and other services. The homeless coordinator for the state department of education, school district homeless liaisons, and other homeless education advocates have urged the firm to back away from this recommendation, but we remain concerned that the push for “alignment” will weaken the Department of Education’s definition of homelessness.
- In one suburban school district, the McKinney-Vento program is under review because the district spent \$1.8 million on homeless transportation last year. Administrators called for an “independent evaluation” of eligibility determinations, and the liaison is under review for having identified too many children as homeless. The discrepancy between HUD’s definition and the education definition lends legitimacy to the claim that homeless children who are doubled up are not actually “homeless.”

They are much less likely to be included in local or state plans to end homelessness, and thus are not targeted for assistance in state and local government programs. In most communities, only people who are considered “homeless” by HUD are included in state and local plans to end homelessness. State and local plans to end homelessness are intended to leverage public and private dollars toward a wide array of services ranging from housing to job training to mental health services. Without inclusion in the HUD definition of homelessness, these children and youth do not benefit from these efforts.

They do not receive priority for Section 8 housing. As a result, their struggle with homelessness is prolonged. Many local housing authorities voluntarily provide a Section 8 preference to homeless individuals or families. However, eligibility to move higher on the waiting list under this preference is dependent on meeting HUD’s definition of homelessness.

They are less likely to benefit from other state-funded homeless policies or programs, such as child care and development. Eligibility for state homeless policies and programs often is modeled on the HUD definition of homelessness. Just this year, for example, the state of California issued new regulations to make the definition of homelessness used for state child care and development programs “more consistent” with federal law. The state adopted the HUD definition of homelessness as the federal law with which to align state policy, leaving thousands of homeless children without special assistance.

Federal homeless policy must recognize the unique plight of children and youth and acknowledge their homelessness for what it is: a crisis that threatens their futures. Without this recognition and attention in the HUD definition of homelessness, today’s homeless children are likely to become tomorrow’s homeless adults. According to the National Survey of Homeless Assistance Providers and Clients, as reported by the Interagency Council on Homelessness in 1999, 21 percent of homeless adults experienced homelessness as children, 33 percent ran away from home, and 22 percent were forced to leave their homes. The consequences of this striking correlation between adverse childhood housing experiences and adult homelessness are clear: when we ignore or minimize child and youth homelessness as something “less than” homelessness, we perpetuate adult homelessness.

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