



**Testimony of
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Good morning, Chairman Duffy, Ranking Member Cleaver, and Members of the Subcommittee on Housing and Insurance. Thank you for the opportunity to provide testimony this morning about the ways in which HUD homeless assistance must be reformed to prevent future generations from experiencing homelessness.

My name is Barbara Duffield, and I am Executive Director of SchoolHouse Connection. We are a national organization working to overcome homelessness through education. We provide strategic advocacy and practical assistance in partnership with early childhood programs, schools, institutions of higher education, service providers, families, and youth. We also support youth and young adults directly through a youth scholarship and leadership program. Our advocacy is guided by the belief that change must be rooted in the realities of local communities. We listen and learn, then advocate and implement.

I've worked at the intersection early care, education, housing, and homelessness for nearly twenty-five years. In that time, early care and education programs have greatly improved their responses to youth and family homelessness. In contrast, U.S. Department of Housing and Urban Development (HUD) policy on homelessness continues to present significant barriers to children, youth, and families, as well as to the agencies who are charged with helping them. These barriers revolve largely around HUD's definition of homelessness, and the kinds of national priorities that HUD has imposed on local communities.

The Homeless Children and Youth Act, HR 1511, is bi-partisan legislation that includes critical reforms to align HUD homeless assistance with other federal systems, and to allow communities to use HUD funding more flexibly, effectively, and appropriately to meet the needs of all populations – including children, youth, and families. My testimony explains why these reforms are urgently needed if we are to truly prevent and end homelessness.

I. THE DISPARITIES BETWEEN FEDERAL DEFINITIONS OF HOMELESSNESS

Federal agencies use different definitions of homelessness for the various programs that they administer. While some definitions of homelessness are promulgated through regulations, the two most widely used definitions of homelessness are codified in statute.

The U.S. Department of Education (ED) definition of homelessness, used by all public schools in the United States, includes children and youth who lack a fixed, regular, and adequate nighttime residence. This definition specifically includes children and youth living in shelters, transitional housing, cars, campgrounds, motels, and sharing the housing of others temporarily due to loss of housing, economic hardship, or similar reasons. This is the same definition of homelessness used by Head Start, federally-funded child care programs, child nutrition, and other federal family and youth programs.

With few exceptions, the U.S. Department of Housing and Urban Development (HUD) definition of homelessness only includes people living in shelters, transitional housing, or on the streets or other outdoor locations. (See Appendix A for a chart of federal definitions of homelessness.)

II. CHILD AND YOUTH HOMELESSNESS SHOWS NO SIGN OF DECLINE, AND CONTRIBUTES TO ADULT HOMELESSNESS

Schools and early childhood programs have an important and unique lens on youth and family homelessness. Public schools are universal institutions: they exist in all communities, including communities that do not have youth or family shelters, where shelters are full, or where shelter conditions preclude families or youth from staying in them. Under federal law, all public schools are required to identify and enroll children and youth who experience homelessness, and provide transportation when they move between different kinds of homeless situations. These unique features of schools make them a more accurate national barometer of family and youth homelessness than HUD data, which is limited only to shelter capacity and people who can be observed to be staying outside during point-in-time counts in winter.

Schools and Head Start programs have not witnessed a decline in homelessness. Quite to the contrary, in school year 2015-2016, schools reported 1.3 million children and youth who were experiencing homelessness at some point in the year.ⁱ This number does not include children who were too young for school, were not identified as homeless, or were not enrolled in school. Nonetheless, it represents a 3.5 percent increase over the previous year and a 34 percent increase since the end of the recession in 2009. There is every indication that the 2016-2017 school year data, which will be released this summer, will show yet another increase. Similarly, Head Start programs, which use the same definition of homelessness as public schools, and also are required by law to identify children who experience homelessness, have reported increases. The number of children experiencing homelessness at some point during the Head Start program year has nearly doubled over time, from 26,200 in 2006-2007, to 52,708 in 2015-2016.ⁱⁱ

In addition to many years of data from federal programs, we now have the best research on youth homelessness that we have ever had: Chapin Hall at the University of Chicago's Voices of Youth Count (VoYC) initiative. This public-private research initiative, funded in part by HUD, found that 4.2 million young people experienced homelessness on their own in America over a 12-month period.ⁱⁱⁱ This means that one in ten young adults aged 18-25, and at least one in 30 adolescents aged 13-17, experienced some form of homelessness unaccompanied by a parent or guardian over the course of a year. While we do not have trend data yet from this initiative, we now know that youth and young adult homelessness is widespread, and that public schools, institutions of higher education, early childhood programs, and especially HUD data undercount it.

Perhaps most importantly, Chapin Hall's research demonstrates that child and youth homelessness are inextricably linked, creating strong pathways to adult homelessness. The study found that youth homelessness often starts early in life, with the majority of homeless young adults having experienced homelessness in childhood or adolescence. It also found that more than one in three homeless young women are pregnant or parenting. Their babies and toddlers are starting their lives homeless, leading to poor health and education outcomes that place them at greater risk of homelessness later in life. Other research demonstrates that youth homelessness is by far the largest pathway into entrenched single adult homelessness.^{iv} Taken as a whole, these findings reveal that child homelessness often leads to youth homelessness, and then to adult homelessness, where children of homeless youth and adults may start the cycle again.

Finally, the research counters the notions that homelessness can be "ended" simply by providing housing to people who are currently homeless, and by focusing on a narrow definition of homelessness. VoYC demonstrates that there is a massive, constant stream of new youth into homelessness over time; that "couch-surfing" is often unsafe; and that many serious challenges, such as addiction and mental health problems, stand in the way of getting out of homelessness.

Based on this research, and our close relationships with educators, service providers and homeless youth across the country, it is our contention that HUD's current approach to homelessness – largely reactive, focused on adults, and focused on housing alone – is failing America's children and youth. If it continues to fail them, we will see all forms of homelessness persist. We must recognize and respond to the unique needs of children and youth if we are to reduce homelessness for all populations. This means changing HUD homeless policy.

III. HOMELESSNESS AMONG CHILDREN, YOUTH, AND FAMILIES IS A DIVERSE, DYNAMIC, AND FLUID PHENOMENON.

Most children and youth who experience homelessness are invisible to the public eye. They don't stay in shelters, because shelters don't exist in their communities, shelters are full, shelters have limited stays or other restrictions, or shelters are perceived – sometimes rightly so – as dangerous places for children and youth. Families fear child welfare involvement if they

are found staying outside; youth and young adults fear predation in adult shelters. As a result, most homeless children and youth stay temporarily with other people in unstable and often unsafe situations. Their homelessness may start by staying with someone they know, but often spirals into staying with anyone who will take them in. Nearly 76 percent of homeless students enrolled in public schools in the 2015-2016 school year were staying in these “doubled-up” situations when they were first identified as homeless by school personnel.^v Many other children and youth stay in motels, either paid for by charity or with whatever meager, inconsistent income their family may have. Approximately 7 percent of homeless students were in motels when they were identified by schools. Only 14 percent of homeless students were in shelters, and just over 3% were unsheltered.

These are not static categories, with different kinds of homeless children and youth staying consistently in one kind of living situation. Rather, homelessness is fluid and inherently unstable. Homeless youth and families move frequently among different living situations. For example, VoYC found that 72 percent of youth who experienced “HUD homelessness” (generally, sleeping on the streets, in a car, or in a shelter) said they also had stayed with others while homeless. Fifty-two percent felt unsafe while staying with others.

Many schools can document mobility and histories of homelessness during a year and over multiple school years. For example, the Anchorage School District has analyzed trend data on homeless students. In this last school year alone, nearly 23 percent of homeless students had more than two addresses, and 24 percent had three or more addresses, with many moving between shelters and doubled-up situations. In Independence, Missouri, 68 percent of homeless students had 1-2 moves in the 2017-2018 school year; 25 percent had 3-4 moves, and 7 percent had more than five moves. The number of motel addresses provided for these moves were twice as many those of shelter addresses, and the number of doubled-up addresses were ten times as many as those of shelter addresses. In Winnacut, New Hampshire, only half of the identified homeless students stayed in the same homeless situation for the entire school year; the rest moved between “ED homeless” (meeting the education definition of homelessness) and “HUD homeless” categories two or three times. Within the 2017-2018 school year, one family’s trajectory looked like this:

- shelter (met HUD and ED definition)
- transitional living shelter, then kicked out (met HUD and ED definition)
- winter rental, then evicted (met neither ED nor HUD definition while renting)
- staying with uncle, then kicked out (met ED definition)
- sleeping in van (met HUD and ED definition)
- motel hopping (met ED definition)

- camping (met HUD and ED definition)

The reality that homelessness is fluid and inherently unstable is acknowledged by federal programs that focus on the needs of infants, toddlers, children, youth, and young adults. Public schools, Head Start programs, Early Intervention providers under Part C of the Individuals with Disabilities Education Act, Child Care and Development Fund programs, institutions of higher education, and the National School Meals program use the definition found in the education subtitle of the McKinney-Vento Act. Congress affirmed this definition of homelessness as recently as 2015, with the reauthorization of the education subtitle of the McKinney-Vento Act by the Every Student Succeeds Act. The Runaway and Homeless Youth Act uses a definition of homelessness that includes youth for whom it is not possible to live in a safe environment with a relative, and who have no other safe alternative living arrangement.

In contrast, HUD's definition of homelessness is practically limited to people who are staying in shelters or on the streets. HUD also has promulgated and prioritized a definition of "chronic homelessness," which is extremely complex and particularly difficult for families to meet; moreover, it does not include families where a child has a disabling condition (see Appendix B for HUD's flow chart of the chronic homelessness definition).

IV. HOW DOES HUD'S DEFINITION OF HOMELESSNESS CREATE BARRIERS FOR CHILDREN, YOUTH, AND FAMILIES?

1. HUD's definition of homelessness excludes some of the most vulnerable children, youth, and families from accessing the help they need.

There is little evidence to suggest that children and youth who are considered homeless under ED's definition because they are staying with others temporarily, or whose family is paying for their motel room, are less vulnerable than those who meet HUD's definition of homelessness. Simply put, where homeless families and youth happen to lay their heads at night does not determine their risk or vulnerability. When I described the debate over federal definitions of homelessness to one remarkable young woman who has experienced many forms of homelessness, including sleeping outside and staying with others, she replied, "The open sky never made me bleed."

A number of studies indicate that homeless children and youth who are staying with others are just as vulnerable as those in shelters or even sleeping outside. For example, the vulnerability of unaccompanied youth who have no option but to stay with others is well documented. A study of homeless youth in Los Angeles reported that: "Staying with a stranger exposes adolescents to greater threats of violence and victimization than shelter stays, and staying with a stranger may put young people at particular risk for sexual exploitation."^{vi} The same study found that African-American youth and LGBT youth were more likely to stay with strangers, placing them at greater risk than their white and heterosexual peers. They are at risk of trafficking, abuse, neglect, and other harms. Multiple studies in rural and urban areas have found approximately 40 percent of unaccompanied homeless youth are victims of trafficking. More than a quarter of

youth experiencing homelessness say that they'd agreed to sexual activity with someone in order to have a place to sleep.^{vii}

Additional evidence comes from Chicago, where the Families in Transition project (“FIT”) is addressing family homelessness through a joint collaboration between the Department of Family Services and the HomeWorks Campaign. Families meeting the McKinney-Vento education definition of homelessness in six high-poverty elementary schools were assessed and prioritized for housing based on the HUD Vulnerability Index (VI) score (with a requisite VI score over 6) via the Coordinated Entry System standardized assessment tool. The 2018 data show that, of FIT-eligible families, families staying in shelters and those staying in doubled-up situations received comparable VI scores.^{viii} Compared to HUD-homeless families, doubled-up families had greater mental health needs, higher rates of medical conditions making it difficult to carry out the activities of daily life, and similar rates of other vulnerabilities, such as domestic violence and substance abuse. In addition, families staying with others were significantly more likely than HUD-homeless families to have experienced homelessness on more than one occasion in the past three years.

Academically, children and youth identified under the McKinney-Vento Act who are staying in motels or with others temporarily (“doubled-up”) fare as poorly on academic assessments, have nearly identical gaps in credit accrual, have nearly identical rates of suspensions and expulsions, and share the same low graduation rates as children and youth who are in shelters or who are unsheltered.^{ix} They also share similarly poor health. For example, among New York City’s high school students in 2015, homeless students staying with others or staying in a motel were at least as likely as students living in homeless shelters to get four or fewer hours of sleep, miss breakfast every day in the previous week, be unaccompanied, and not get at least 60 minutes of physical activity per day in any day during the previous week.^x

Young children – infants, toddlers, and preschoolers – also face significant harm while staying with others in “doubled-up situations,” or in motels. They may be kept in car seats and other confined places, stunting their motor and other developmental skills. They are shushed and restrained in order not to get their family kicked out from wherever they may be staying. Infants are at risk of Sudden Infant Death Syndrome if they are sleeping on couches with their mothers. Young children and their mothers may not have access to adequate food, and suffer the developmental consequences of malnutrition. They may be less likely to be enrolled in quality early childhood programs, since they are not in a readily identifiable place like a shelter.^{xi} They are exposed to violence, disruption of routine, and other traumas that set them back in life, before they even start school.

Despite their extreme vulnerability, homeless children, youth, and families who do not meet HUD’s definition of homelessness are not able to be assessed for HUD homeless assistance through the coordinated entry system. This means that some of the most vulnerable children and youth are barred from services that they desperately need. Coordinated entry presents many challenges, as described by other witnesses here today. But the reality, given high levels of need, is that some kind of prioritization or triage based on risk or “acuity” is necessary. For

services to be effective in ending homelessness, access must be determined by overall levels of vulnerability and need, rather than simplistically and arbitrarily by where a child or youth happens to be sleeping at any given time.

2. HUD’s definition of homelessness keeps homeless children and youth invisible, limiting public and private action to address their needs.

HUD’s definition leaves out the vast majority of children, youth, and families who experience homelessness. This is particularly true in rural areas. VoYC found that the prevalence of youth and young adult homelessness in rural and urban areas is statistically identical, but rural homelessness is more hidden. In any community without a shelter for families or youth, or where those shelters are full, or unavailable, the only homeless families or youth counted or served by HUD are those observed staying outside.

The failure of HUD’s definition of homelessness to include most children, youth, and families who experience homelessness means that these children and youth do not show up in counts that are considered “official” by local, state, and federal government, as well as private philanthropy. HUD data thus paint a picture of a smaller problem. In addition, metrics for “ending” homelessness are based on HUD’s definition, and thus lead to skewed claims of progress on youth and family homelessness. The end result is a homeless response system that continues to be focused “downstream” – on adults who have serious problems, many of whose homelessness might have been prevented if communities responded earlier, using an accurate definition of child and youth homelessness.

3. HUD’s definition of homelessness hinders efforts at prevention by making it much more difficult for public schools, institutions of higher education, and early childhood programs to accomplish their missions. Each of these systems is critical for preventing and ending homelessness in the long-term.

HUD’s definition is an impediment to leveraging the early care and education that can change the trajectory of children and youth’s lives, and prevent future homelessness. VoYC found that the top three factors associated with higher risk of young adult homelessness are 1) not having a high school diploma or GED (346% higher risk of homelessness as a young adult); 2) having a child (200% higher risk of homelessness as a young adult); and 3) having a low income (162% higher risk of homelessness as a young adult). These top factors are related directly to early childhood programs, public education, and higher education.

Stabilizing homeless children and youth through access to HUD homeless services could benefit their health, development, and academic attainment. Graduating from high school protects against young adult homelessness. Obtaining a college degree leads to significantly higher salaries, better health, and home ownership, again protecting against homelessness.^{xii} Early childhood programs for young children not only prepare children for later academic and life success, but also allow parents to search for work and housing. For these reasons, education is the surest path out of homelessness. Yet it is extremely challenging for early childhood

programs, public schools, and higher education institutions to collaborate with HUD homeless assistance programs when the majority of the homeless children and youth they are required to identify and serve are not eligible for any HUD homeless services, or are not eligible for the HUD homeless assistance programs from which they could benefit the most.

Early care and education programs often are marginalized in community discussions of homelessness because of the differences in federal definitions. They are forced to focus on an extremely narrow subset of the children and youth they serve in order to sustain a collaboration. Their definitions and data are not taken seriously, and their work is not seen as pivotal to ending homelessness. If the HUD definition were aligned with the definition used by other federal programs, early care, education, and housing collaborations could be powerful, allowing all systems to maximize resources to promote children's health, development, and the academic success they need to obtain decent jobs and afford housing as adults.

V. THE CHANGES TO HUD'S DEFINITION OF HOMELESSNESS IN THE 2009 REAUTHORIZATION OF THE HEARTH ACT HAVE FAILED TO REMEDY THESE PROBLEMS.

The debate over HUD's definition of homelessness has a long history, resulting in some changes to the HUD homeless assistance statute in the 2009 reauthorization. However, the barriers for children, youth, and families presented by HUD's definition have continued for the following reasons:

1. While the statute appears to recognize homelessness under other federal definitions, the language places arbitrary and convoluted requirements on people who are homeless under those definitions, requiring multiple moves within a specified time period and prescribing a minimal number of disabling conditions. ("Category 3" of the HUD definition). In essence, the statutory definition itself excludes most children and youth who are homeless, and predicates eligibility on a mandatory period of suffering and struggle that ultimately damage children, creating the potential for lifelong challenges.
2. For those children and youth who are homeless under other federal definitions, and who have moved multiple times, and who meet the other pre-requisites of "Category 3," the statute requires communities to request special permission from HUD to use HUD homeless assistance funds to serve them. To date, HUD has denied every such request from every community, with no written explanation (see Appendix C for HUD's FOIA response to the Chicago Coalition for the Homeless documenting HUD's pattern of excluding Category 3). Many other communities have not applied to use funds for Category 3 because of the difficulty of proving eligibility, HUD's systematic defunding of the program models for which families and youth in Category 3 are eligible, and verbal communication from HUD that it has not and will not grant permission to use this category.

3. HUD has restricted eligibility further through regulations that impose significant documentation requirements for establishing homelessness under all the categories added in 2009, adding to the complexity of the statutory definition.^{xiii} Families and youth cannot produce required documentation as they struggle with the instability and trauma of homelessness. In fact, the McKinney-Vento Act recognizes this in the Education subtitle, which allows children and youth to be enrolled in school immediately, without any of the typically required documentation. HUD's policies, however, ignore the real difficulties of obtaining and preserving documents while homeless.
4. HUD also has used its Notice of Funding Availability (NOFA) to limit services to children and youth. Though the NOFA, HUD has restricted the eligibility of people who are homeless under the categories of homelessness added in 2009 to certain program models, while simultaneously defunding those program models (transitional housing and supportive services).^{xiv}

VI. HUD HAS IMPOSED NATIONAL PRIORITIES FOR POPULATIONS AND PROGRAM MODELS THAT DON'T WORK FOR MANY FAMILIES AND YOUTH IN MANY COMMUNITIES, AND THAT CREATE BARRIERS TO PERMANENT EXITS FROM HOMELESSNESS.

Homelessness looks different in communities across the country; it is shaped by local economies, housing markets, demographic trends, and social problems, such as opioid or methamphetamine use. The local resources available to address homelessness for specific populations also vary considerably.

Despite these diverse local contexts for homelessness, HUD has created strong, federal incentives and requirements for certain kinds of housing models, like Rapid Rehousing, and for certain populations, like chronically homeless adults, that do not match all communities' needs. Even when communities identify greater needs for other populations or program models, they must adopt national priorities in order to be competitive for funding.

In addition, the program models and priorities established by HUD are predicated on the view that homelessness is primarily, if not exclusively, a housing problem, solved by housing alone. This view has marginalized program models that address the complex root causes of homelessness, and that provide enough time to ensure that families and youth will be able to sustain housing on their own once they leave the program.

In particular, we are concerned that Rapid Rehousing – an intervention with origins in response to the recession, where many families needed short-term housing assistance to recover from homelessness due to foreclosure or job loss – has been overprescribed, including for families suffering from deep poverty and its complications. In some jurisdictions, many families cannot maintain their housing once the subsidy ends. Consequently, they experience repeated homelessness, re-traumatizing them and their children.^{xv} Unaccompanied homeless youth

under age 18 – the population for whom lack of shelter is the greatest challenge – are not old enough to sign a lease, which precludes Rapid Rehousing as a viable option.

Above all, we are concerned with the outcomes of HUD’s preferred program models on the development and well-being of children and youth, including educational outcomes. New research suggests that priority access to Rapid Rehousing may not be best for students experiencing family homelessness.^{xvi} In fact, when housing interventions were analyzed in light of up to four years of school records, students assigned to Rapid Rehousing had lower average attendance and lower math and reading achievement than children receiving only typical shelter services. In the comparisons that involved only permanent housing subsidies and Rapid Rehousing, homelessness was associated with achievement gaps in both math and reading achievement that persisted over years. Homeless and housing interventions must be judged on their long-term impact on children and youth, including their educational outcomes; if they are not, children and youth will continue to cycle in and out of homelessness over their lifetimes, mired in poverty and its ill effects.

VII. HUD HAS IMPLEMENTED POORLY PROVISIONS IN THE 2009 REAUTHORIZATION DESIGNED TO INCREASE ACCESS TO EARLY CARE AND EDUCATION. AS A RESULT, CHILDREN AND YOUTH CONTINUE TO FACE BARRIERS TO THE EARLY CARE AND EDUCATION THAT CAN STABILIZE THEM, AND ULTIMATELY HELP THEM ESCAPE POVERTY AND HOMELESSNESS AS ADULTS.

The 2009 reauthorization of the HEARTH Act included four specific provisions designed to improve access to early care and education:

Section 427(B)(iii): The Continuum of Care applicant will be required to demonstrate that it is collaborating with local education agencies to assist in the identification of homeless families as well as informing these homeless families and youth of their eligibility for McKinney-Vento education services.

Section 426(b)(7): The Continuum of Care applicant will be required to demonstrate that it is considering the educational needs of children when families are placed in emergency or transitional shelter and is, to the maximum extent practicable, placing families with children as close to possible to their school of origin so as not to disrupt the children’s education.

Section 426(b)(4)(C): Project applicants must demonstrate that their programs are establishing policies and practices that are consistent with, and do not restrict the exercise of rights provided by the education subtitle of the McKinney-Vento Act, and other laws relating to the provision of educational and related services to individuals and families experiencing homelessness.

Section 426(b)(4)(D): Project applicants must demonstrate that programs that provide housing or services to families are designating a staff person to ensure that children are

enrolled in school and connected to the appropriate services within the community, including early childhood programs such as Head Start, Part C of the Individuals with Disabilities Education Act, and McKinney- Vento education services.

HUD has done little with these demonstrations and assurances. Almost ten years after they became law, most providers I meet – and certainly most educators – are not even aware that they exist. In the 2017 NOFA, HUD provided for “up to” one point in the plan to end homelessness for households with children for demonstrating that families are informed of and receive referrals to educational services. In the plan to end youth homelessness, HUD awarded “up to” one point for demonstrating collaboration with school districts. HUD has not asked communities for the names of staff people designated by HUD homeless programs to ensure children are enrolled in school and connected to early childhood programs, nor provided such a list to school districts. In fact, most homeless programs are unable to name that designee. These are missed opportunities to connect children and youth to early care and education – the best long-term strategies for avoiding homelessness in the future.

VIII. THE HOMELESS CHILDREN AND YOUTH ACT IMPROVES ACCESS TO HUD HOMELESS SERVICES FOR HOMELESS CHILDREN, YOUTH, AND FAMILIES BY:

1. Aligning HUD’s definition of homelessness with those of federal programs serving children, youth, and families.

In contrast to the narrow and complex statutory and regulatory process for establishing eligibility for HUD homeless assistance programs, the Homeless Children and Youth Act allows children and youth who have been verified as homeless by a director or designee of one of one of eight specified federal programs to be eligible for HUD homeless assistance. These federal programs include public schools, the Runaway and Homeless Youth (RHYA) program, Head Start, the Child Care and Development Fund, the Violence Against Women Act, Health Care for the Homeless program, the Child Nutrition Act, the Higher Education Act, and the United States Housing Act. Most of these programs have preexisting requirements to identify homeless children and youth.

This amendment allows a streamlined referral process in which homeless children, youth, and families who have been identified by specific federal programs are eligible to be assessed for HUD homeless assistance. It entrusts the people who are closest to the child, youth, and family – the people who know them the best and who have verified their eligibility for services under their respective federal programs – to work more closely with HUD homeless assistance providers in the assessment process. The amendment does not make all homeless children and youth under all federal statutes automatically eligible for HUD homeless assistance, or require communities to prioritize children and youth.

A similar mechanism exists in federal school meal policy and higher education policy. School district liaisons are authorized to determine eligibility for school meals under the USDA program; the liaison determines a child or youth’s homeless status, then simply provides a

name and date of homelessness to the child nutrition coordinator. The family or youth is spared filling out another application and receives expedited access to food. Under higher education law, school district liaisons, RHYA providers, and HUD homeless assistance providers are authorized to determine the status of unaccompanied homeless youth for the purposes of being an independent student for federal financial aid. The intent of this process is to remove bureaucratic hurdles to financial aid for unaccompanied homeless youth who have already been identified by specific federal homeless programs. Both policies have been in place for well over a decade, streamlining access to assistance, reducing paperwork, and facilitating collaboration between federal programs. These policies thus provide strong precedents for amending HUD homeless assistance to remove barriers for homeless children, youth, and families.

2. Allowing communities to provide housing and services tailored to the unique needs of each homeless population, including housing models that are most appropriate for youth and for families.

The Homeless Children and Youth Act would allow local communities to meet local needs, as long as they do so effectively. It would correct the heavy-handedness of current HUD homeless policy, which imposes federal priorities on local communities. It would prohibit HUD from awarding greater priority, points, or weight based solely on the specific homeless population to be served or the proposed housing or service model. It would require HUD to ensure that scoring is based primarily on the extent to which communities demonstrate that a project and program components meet the priorities identified in the local plan, and are cost-effective in meeting the overall goals and objectives identified in the local plan.

There would be nothing to prevent communities that can demonstrate that their current approach meets local needs in a cost-effective manner to continue their approach. However, communities that have identified other needs would be free to respond to them.

3. Increasing the visibility of homeless children, youth and families through data transparency and more accurate counts.

Both the HUD definition of homelessness and its Point in Time (PIT) Count mask the extent of the need for families and youth, making it much more difficult to raise awareness of the problem of child and youth homelessness. In addition to the flawed methodology of the PIT count, the HEARTH Act prohibits HUD from requiring communities to count the categories of homelessness that were added in the 2009 reauthorization. To ensure more accurate data on all types of homelessness, the Homeless Children and Youth Act requires that if communities conduct annual counts of homeless people, they must count individuals that meet any part of the definition of homelessness. It also requires HUD's annual report to Congress to include data on homelessness from programs under other federal statutes. The Homeless Children and Youth Act therefore will provide policymakers and communities with a more complete picture of homelessness among all who experience it. We cannot use funding efficiently, or engage the

private sector in our efforts, without complete data. We cannot solve a problem if we refuse to see the full extent of the problem.

4. Aligning HUD homeless assistance with infant, child, and youth serving systems.

The Homeless Children and Youth Act will help ensure that children, youth, and families receive all services for which they are eligible, including child care, education, and the supportive services they need to obtain decent jobs and afford housing as adults. It makes coordination with early care and education required criteria for competitive grants, adds unaccompanied youth to educational assurances, and programs to ensure unaccompanied homeless youth are informed of their status as independent students for financial aid purposes and receive verification of that status. These provisions will improve homeless children and youth's access to early care and education, birth through postsecondary, helping to stabilize them during their time of crisis, and ensuring that they receive the full benefits of programs that can prevent future homelessness.

IX. THE HOMELESS CHILDREN AND YOUTH ACT WILL NOT TAKE SERVICES AWAY FROM OTHER POPULATIONS, "FLOOD" THE SYSTEM, SET BACK "PROGRESS" TOWARD THE GOAL OF PREVENTING AND ENDING HOMELESSNESS, OR REQUIRE ADDITIONAL FUNDING TO IMPLEMENT.

The concerns raised by opponents of the Homeless Children and Youth Act do not stand up to scrutiny.

Whether or not newly eligible children and youth receive HUD Homeless Assistance services will depend on local needs assessments. Communities that identify greater needs for single adults, or other populations, will be free to continue to prioritize programs to serve them. In addition, communities that establish coordinated assessment systems would be required to ensure that those most in need of assistance receive it, and that the criteria used to assess need employ separate, age-appropriate criteria to assess the safety and needs of children and youth. By allowing communities to assess and serve some of the most vulnerable children and youth, future homelessness – and the costs associated with it – will decrease.

The notion that service providers will "cherry pick" less vulnerable children and youth if the Homeless Children and Youth Act were enacted is unfounded. It assumes that children and youth who do not meet HUD's definition are less vulnerable, with fewer problems. As described above, this is simply untrue. Moreover, prioritization will still occur, ensuring that those most in need of services receive them.

It is also important to recognize that HUD homeless assistance is not the sole source of funding for homeless services. Other public and private sources contribute significantly. As noted

above, HUD's definition of homelessness and its Point in Time Count mask the extent of the need for families and youth, making it much more difficult to raise awareness of the problem of child and youth homelessness among non-federal sources of funds. The Homeless Children and Youth Act will increase the visibility of homeless children, youth, and families through more accurate data, thus providing a true picture of homelessness and helping communities leverage and attract more public and private resources to address homelessness.

The current HUD definition of homelessness results in inefficient and ineffective use of funds. Service providers and educators use general funds or donations to put families and youth into emergency shelters or motels for the sole purpose of qualifying them for permanent supportive housing or Rapid Rehousing programs. Some providers designate beds as emergency beds for the purpose of qualifying youth for HUD homeless assistance. This is a waste of resources and creates destabilizing and harmful moves. The current HUD homeless assistance program has become so complicated that HUD spends millions of dollars in technical assistance to help communities understand and implement it. The federal government should not tie the hands of local communities with inconsistent definitions of homelessness and funding streams that prevent agencies from maximizing their impact. The Homeless Children and Youth Act simplifies eligibility; allows communities to make the best use of existing resources; and promotes leveraging additional resources.

Finally, the Homeless Children and Youth Act will allow communities to invest in homeless children and youth, thereby preventing future adult homelessness, and future child and youth homelessness. Intervening in the cycle at earlier stages is key to prevention, and ultimately the key to ending homelessness.

CONCLUSION

For years, HUD's homelessness policy has focused downstream, on homeless adults. Yet by failing to account for the nature and needs of homeless children, youth and families, federal homelessness policy has assured a continuing stream of young people into adult homelessness. Our collective work on homelessness must move upstream. A crisis-response system that is focused on only one element of homelessness, disconnected from the complex root causes of homelessness, and focused primarily on the needs of adults, will never end or prevent homelessness.

The Homeless Children and Youth Act is a bipartisan bill supported by a wide range of organizations, including associations of service providers and educators who work most closely with families and youth experiencing homelessness (see Appendix D for a list of supporting national organizations). We implore you to enact it, so that the promise of every child and youth may be realized, and homelessness will cease to rob millions of children, youth, and adults of their human potential.

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- ⁱ National Center for Homeless Education. Federal Data Summaries. Available at: https://nche.ed.gov/ibt/aw_statistics.php
- ⁱⁱ The Office of Head Start (OHS) Program Information Report (PIR). Available at: <https://eclkc.ohs.acf.hhs.gov/data-ongoing-monitoring/article/program-information-report-pir>
- ⁱⁱⁱ Morton, M.H., Dworsky, A., & Samuels, G.M. (2017). *Missed opportunities: Youth homelessness in America. National estimates*. Chicago, IL: Chapin Hall at the University of Chicago
- ^{iv} Johnson, G. and Chamberlain, C. "From Youth to Adult Homelessness." *Australian Journal of Social Issues*, Vol. 43, No. 4 (Summer 2008).
- ^v National Center for Homeless Education. (2017). *Federal Data Summary School Years 2013-14 to 2015-2016*. Education for Homeless Children and Youth. Available at: <https://nche.ed.gov/downloads/data-comp-1314-1516.pdf>
- ^{vi} Rice, E., et al. "Homelessness Experiences, Sexual Orientation, and Sexual Risk Taking Among High School Students in Los Angeles." *Journal of Adolescent Health* (2013) 1-6.
- ^{vii} Administration on Children, Youth and Families, Family and Youth Services Bureau. (2016). *Street Outreach Program Data Collection Project Final Report*. Available at www.acf.hhs.gov/sites/default/files/fysb/data_collection_study_final_report_street_outreach_program.pdf
- ^{viii} Data and interviews with Julie Dworkin, Director of Policy, Chicago Coalition for the Homeless, on May 29, 2018, and Mary Tarullo, Associate Director of Policy, Chicago Coalition for the Homeless, on May 29, 2018.
- ^{ix} Analysis of K-12 public school data by [Schoolhouse Washington](#), a project of [Building Changes](#), a nonprofit organization in Washington State focused on youth and family homelessness; Institute for Children, Poverty, & Homelessness. *Atlas of Student Homelessness in New York City 2017*. Available at: http://www.icphusa.org/new_york_city/map-atlas-student-homelessness-new-york-city-2017/
- ^x Institute for Children, Poverty, & Homelessness, New York City. Forthcoming analysis of 2015 Youth Risk Behavior Survey data, available early July, 2018.
- ^{xi} Miller, P. M. (2011). "A Critical Analysis of the Research on Student Homelessness." *Review of Educational Research*, 81(3), 308– 337. Retrieved from <http://doi.org/10.3102/00346543.11415120>
- ^{xii} See, e.g., Federal Reserve Bank of New York (2017). *Press Briefing on Household Debt, with Focus on Student Debt*. Accessed June 3, 2018 at <https://www.newyorkfed.org/medialibrary/media/press/PressBriefing-Household-Student-Debt-April32017.pdf>; Carnevale, Anthony, Smith, Nicole, and Strohl, Jeff (2014). *Recovery: Job Growth and Education Requirements Through 2020*. Georgetown University's Center on Education and the Workforce. Accessed June 3, 2018 at: https://cew.georgetown.edu/wp-content/uploads/2014/11/Recovery2020.ES_Web.pdf.
- ^{xiii} U.S. Department of Housing and Urban Development. Homeless Definition Record Keeping Requirements and Criteria. Available at: https://www.hudexchange.info/resources/documents/HomelessDefinition_RecordkeepingRequirementsandCriteria.pdf
- ^{xiv} U.S. Department of Housing and Urban Development. Homeless Definition Eligibility by Component. Available at: https://www.hudexchange.info/resources/documents/HomelessDefEligibility%20_SHP_SPC_ESG.pdf
- ^{xv} Washington Legal Clinic for the Homeless. (2017). "Set Up to Fail: Rapid Rehousing in the District of Columbia." Available at: <https://www.legalclinic.org/wp-content/uploads/2018/03/Set-up-to-fail-2nd-edition.pdf>
- ^{xvi} Available at: Cutuli, J. J., & Herbers, J. E. (in press). Housing interventions and the chronic and acute risks of family homelessness: Experimental evidence for education. *Child Development*. DOI: 10.1111/cdev.13041 Available at: https://works.bepress.com/jj_cutuli/32/download/

Appendix A
Federal Definitions of Homelessness

Federal Definitions of Homelessness <i>(emphasis added)</i>		
<p>Runaway and Homeless Youth Act - 42 U.S.C. §5601 (Used by HHS for Family and Youth Services Bureau)</p>	<p>McKinney-Vento Homeless Assistance Act - 42 U.S.C. §11434A, As Amended by The Every Student Succeeds Act - (Used by ED, by HHS for Head Start and the Child Care Development Fund, by USDA for Child Nutrition, and by DOJ for the Violence Against Women Act)</p>	<p>McKinney-Vento Homeless Assistance Act as Amended by Homeless Emergency and Rapid Transition to Housing (HEARTH) Act of 2009 - 42 U.S.C. §11302 (Used by HUD)*</p>
<p>The term ‘homeless’, used with respect to a youth, means an individual—</p> <p>(A) who is—</p> <p>(i) less than 21 years of age, or, in the case of a youth seeking shelter in a [Basic Center Program], less than 18 years of age or is less than a higher maximum age if the State where the center is located has an applicable State or local law (including a regulation) that permits such higher maximum age in compliance with licensure requirements for child- and youth-serving facilities; and</p> <p>(ii) for [a Transitional Living Program], not less than 16 years of age and either</p> <p>(I) less than 22 years of age; or</p> <p>(II) not less than 22 years of age, as the expiration of the maximum period of stay permitted under section 322(a)(2) if such</p>	<p>The term “homeless children and youths”--</p> <p>(A) means <i>individuals who lack a fixed, regular, and adequate nighttime residence</i> (within the meaning of section 103(a)(1)); and</p> <p>(B) includes--</p> <p>(i) children and youths who are <i>sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason</i>; are living in motels, hotels, trailer parks, or camping grounds <i>due to the lack of alternative adequate accommodations</i>; are living in emergency or transitional shelters; or are abandoned in hospitals;</p> <p>(ii) children and youths who have a <i>primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings</i> (within the meaning of section 103(a)(2)(C));</p>	<p>...[T]he terms ‘homeless’, ‘homeless individual’, and ‘homeless person’ means—</p> <p>(1) an individual or family who <i>lacks a fixed, regular, and adequate nighttime residence</i>;</p> <p>(2) an individual or family with a <i>primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground</i>;</p> <p>‘(3) an individual or family <i>living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including hotels and motels paid for by Federal, State, or local government programs for low-income individuals or by charitable organizations, congregate shelters, and transitional housing)</i>;</p> <p>(4) an individual who resided in</p>

<p>individual commences such stay before reaching 22 years of age;</p> <p>[Note that pending legislation would raise this age to 24]</p> <p>(B) <i>for whom it is not possible to live in a safe environment with a relative;</i> and</p> <p>(C) who has <i>no other safe alternative living arrangement.</i></p>	<p>(iii) children and youths who are <i>living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings;</i> and</p> <p>(iv) migratory children (as such term is defined in section 1309 of the Elementary and Secondary Education Act of 1965) who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (i) through (iii).</p>	<p><i>a shelter or place not meant for human habitation and who is exiting an institution where he or she temporarily resided;</i></p> <p>(5) an individual or family who—</p> <p>(A) <i>will imminently lose their housing, including housing they own, rent, or live in without paying rent, are sharing with others, and rooms in hotels or motels not paid for by Federal, State, or local government programs</i> for low-income individuals or by charitable organizations, as evidenced by—</p> <p>(i) a court order resulting from an eviction action that notifies the individual or family that they must leave within 14 days;</p> <p>(ii) the individual or family having a primary nighttime residence that is a room in a hotel or motel and where they lack the resources necessary to reside there for more than 14 days; or</p> <p>(iii) credible evidence indicating that the owner or renter of the housing will not allow the individual or family to stay for more than 14 days, and any oral statement from an individual or family seeking homeless assistance that is found to be credible shall be considered credible evidence for purposes of this clause;</p> <p>(B) has no subsequent residence identified; and</p> <p>(C) lacks the resources or support networks needed to obtain other permanent housing; and</p> <p>(6) <i>unaccompanied youth and homeless families with children and youth defined as homeless</i></p>
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		<p><i>under other Federal statutes who—</i></p> <p>(A) have experienced a <i>long term period without living independently in permanent housing,</i></p> <p>(B) have <i>experienced persistent instability</i> as measured by frequent moves over such period, and</p> <p>(C) <i>can be expected to continue in such status for an extended period of time</i> because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse, the presence of a child or youth with a disability, or multiple barriers to employment.</p> <p>(b) Domestic violence and other dangerous or life-threatening conditions. Notwithstanding any other provision of this section, the Secretary shall consider to be homeless any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions in the individual's or family's current housing situation, including where the health and safety of children are jeopardized, and who have no other residence and lack the resources or support networks to obtain other permanent housing.</p> <p>(c) Income eligibility (1) In general A homeless individual shall be eligible for assistance under any program provided by this chapter, only if the individual complies with the income</p>
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		<p>eligibility requirements otherwise applicable to such program.</p> <p>(2) Exception Notwithstanding paragraph (1), a homeless individual shall be eligible for assistance under title I of the Workforce Innovation and Opportunity Act.</p> <p>*Note that HUD’s “Notice on Limitation on Use of Funds to Serve Persons Defined as Homeless Under Other Federal Laws” (Notice: CPD- 12-001, Issued: January 17, 2012, available at http://bit.ly/HUDNotice) restricts communities from using HUD funding to serve youth considered homeless under other definitions. A FOIA request of HUD revealed that since 2010, HUD has not allowed any community to serve persons defined as homeless under other federal laws, despite special requests from twelve communities to do so.</p> <p>HUD’s final rule on subparagraph (b), Domestic Violence, omits the statutory language “including where the health and safety of children are jeopardized.” In addition, HUD has restricted eligibility under subparagraph (b), Domestic Violence, such that persons who meet these criteria are not eligible for Rapid Rehousing unless they also meet Category 1, “literally homeless.”</p>
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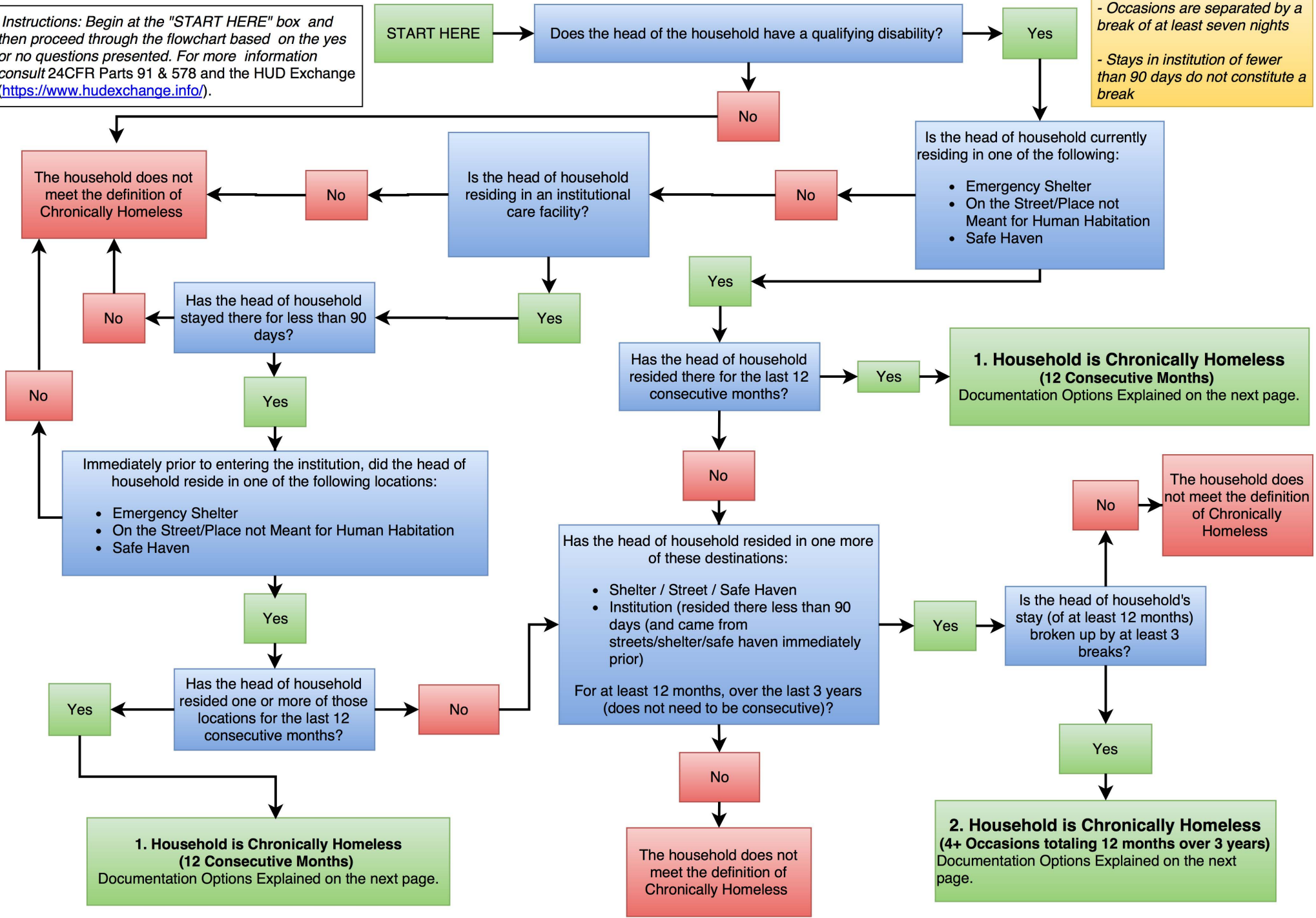


Appendix B

Flowchart of HUD's Definition of Chronic Homelessness

Instructions: Begin at the "START HERE" box and then proceed through the flowchart based on the yes or no questions presented. For more information consult 24CFR Parts 91 & 578 and the HUD Exchange (<https://www.hudexchange.info/>).

Remember:
 - Occasions are separated by a break of at least seven nights
 - Stays in institution of fewer than 90 days do not constitute a break





Documentation Standards for Chronic Homelessness

Instructions: Based on your navigation of the flowchart on the previous page, locate the appropriate numbered situation on this page and follow the documentation standards noted. This tool summarizes the criteria for the new Chronically Homeless Definition. To review the exact language, please refer to 24 CFR Parts 91 & 578 and the HUD Exchange (<https://www.hudexchange.info/homelessness-assistance/resources-for-chronic-homelessness/>)

Situation	Documentation of Homelessness	Documentation of Disability
<p>1. Household is Chronically Homeless</p> <p>(12 Consecutive Months)</p>	<ul style="list-style-type: none"> <input type="checkbox"/> HMIS record or record from a comparable database; or <input type="checkbox"/> Written observation by an outreach worker of the conditions where the individual was living; or <input type="checkbox"/> Written referral by another housing or service provider; or <input type="checkbox"/> Where the evidence above is unavailable, there must be a certification by the individual seeking assistance, accompanied by the intake worker's documentation of the living situation and the steps taken to obtain the evidence listed above. <p>If the head of household is currently staying in an institution where they have been for less than 90 days (and were in a shelter/street/safe haven immediately prior) their Institutional Stay can be documented by:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Discharge paperwork or written/oral referral from a social worker or appropriate official of the institutional facility, with start/end dates of client's residence, or <input type="checkbox"/> Where the evidence above is unavailable, there must be a certification by the individual seeking assistance, accompanied by the intake worker's documentation of the living situation and the steps taken to obtain the evidence listed above. 	<p>Documentation of the head of household's disability, including:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Written verification of the disability from a licensed professional; <input type="checkbox"/> Written verification from the Social Security Administration; <input type="checkbox"/> The receipt of a disability check; or <input type="checkbox"/> Intake staff-recorded observation of disability that, no later than 45 days from the application for assistance, accompanied by supporting evidence.
<p>2. Household is Chronically Homeless</p> <p>(4+ Occasions totaling 12 months over 3 years)*</p> <p><i>*May include institution stays of <90 days</i></p>	<ul style="list-style-type: none"> <input type="checkbox"/> HMIS record or record from a comparable database; or <input type="checkbox"/> Written observation by an outreach worker of the conditions where the individual was living; or <input type="checkbox"/> Written referral by another housing or service provider; or <input type="checkbox"/> Discharge paperwork or written/oral referral from a social worker or appropriate official of the institutional facility, with start/end dates of client's residence (for institutional stays of less than 90 days) <input type="checkbox"/> Where the evidence above is unavailable, there must be a certification by the individual seeking assistance, accompanied by the intake worker's documentation of the living situation and the steps taken to obtain the evidence listed above. <p><i>* Each separate occasion MUST be documented (minimum of 3 breaks). 100% of the breaks can be documented by self- report.</i></p>	<p>Documentation of the head of household's disability, including:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Written verification of the disability from a licensed professional; <input type="checkbox"/> Written verification from the Social Security Administration; <input type="checkbox"/> The receipt of a disability check; or <input type="checkbox"/> Intake staff-recorded observation of disability that, no later than 45 days from the application for assistance, accompanied by supporting evidence.

Important Notes:

- Each individual occasion needs to be fully documented.
- Breaks can be documented by self-report.
- For each Project:
 - 100% of households served can use self-certification for 3 months of their 12 months,
 - 75% of households served need to use 3rd Party documentation for 9 months of their 12 months, and
 - 25% of households served can use self-certification as documentation for any and all months.



Appendix C
U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-0001

OFFICE OF ADMINISTRATION

May 24, 2018

Ms. Mary Tarullo
Associate Director of Policy
Chicago Coalition for the Homeless
70 East Lake Street, Suite 720
Chicago, IL 60601

RE: Freedom of Information Act Request
FOIA Control No: 17-FI-HQ-01151

Dear Ms. Tarullo:

This letter is an interim response to your Freedom of Information Act (FOIA) request dated and received on May 2, 2017. In your request, you asked for the following:

1. All applications from local Continuums around the country that have applied to use Continuum of Care (CoC) funds for families and youth meeting the Department of Housing and Urban Development's Category 3 definition of homelessness, for the time frame of 2010 to 2016.
2. All documents that contain HUD's response to the applications during that span.

In addition, in an email dated November 17, 2017, to Howard Rosenberg of my staff, you asked for clarification on the following two points:

3. Can HUD please clarify how many CoCs applied to use HUD's Category 3 definition of homelessness for the 2016 cycle?
4. How many of those applications were granted?

In response to your first request, during the time frame of your request, 2010 to 2016, there are 12 applications that sought to use HUD's Category 3 definition of homelessness. (Of the 12 applications, none were successful.)

In response to your second request, there are no documents in which HUD has conveyed to Category 3 applicants that their applications have been rejected; rather, HUD merely has notified CoCs of funding applications that HUD has approved.

In response to your third request, the answer is three.

In response to your fourth request, the answer is zero.

Unsuccessful applications are available for you to receive, subject to the submitter notice process in which HUD has provided you a fee estimate for the 25 applications. However, under that process, the entity that submitted the application reviews its submission and can propose possible redactions, which HUD may or may not agree with. After HUD adjudicates any objections raised by the entity, the Department then releases the application, in whole or in part. The page range of an application ranges from 1 to 450, and, the enclosed cost estimate assumes 450 pages in each. If you are interested in pursuing your request further, HUD can provide a better estimate of the number of pages for particular applications.

I have determined that your request falls under the category of "other requester," as described in 24 CFR 15.110(b) of the Department's FOIA regulations. Therefore, as you may know, each FOIA request must contain an agreement to pay certain costs for processing the records. From a preliminary search for records responsive to your request, the Office of Community Planning and Development has confirmed that the estimated cost for processing your FOIA request will be \$530.00. This assessment fee is based on \$530.00 for 5,400 photocopies at 10 cents a page, with the first 100 pages free.

In the event that the estimated fees are higher than you anticipated, please feel free to confer with Mr. Howard Rosenberg of my staff to determine if it will be possible to redefine your request to meet your needs at a reduced cost. He can be reached at (202) 402-5507. Otherwise, because the fees exceed \$250.00, the Department must receive payment before releasing the records requested. Responsive documents will be provided to you once payment is received. If you wish the Department to proceed with processing your request as originally stated, please see the enclosed billing statement and remit a check or money order, **made payable to the U.S. Treasury**, to:

U.S. Department of Housing and Urban Development
Office of the Executive Secretariat
FOIA Branch
451 Seventh Street, SW, Room 10139
Washington, DC 20410-3000

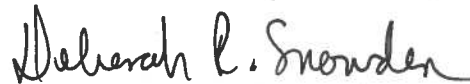
Attention: Howard Rosenberg
Telephone: (202) 402-5507

To ensure proper credit, please reference FOIA control number 18-FI-HQ-00710 on the check or money order when making your payment. Please be advised that further processing of your request will be held in abeyance for 15 business days from the date of this letter. If the Department does not receive your payment within the 15-day period, or you have not contacted

HUD staff to redefine your request, I will conclude that you do not desire further processing and your request will be withdrawn. Please note that a withdrawal would not preclude you from filing further FOIA requests.

Thank you for your interest in the Department's programs and policies.

Sincerely,



Deborah R. Snowden
Deputy Chief FOIA Officer
Office of the Executive Secretariat

Enclosure

Appendix D

Supporters of the Homeless Children and Youth Act

This list includes national organizations that support the Homeless Children and Youth Act. A partial list of state and local supporters may be found at <http://www.helphomelesskidsnow.org>

Alliance for Excellent Education
American Academy of Pediatrics
American Psychological Association
American School Counselor Association
Center for Policy Research
Children's Advocacy Institute
Child Welfare League of America
Children's Home Society of America
Coalition for Juvenile Justice
Covenant House International
Education Navigation LLC
Every Child Matters
Family Focused Treatment Association
Family Promise
First Focus Campaign for Children
Global Alliance for Behavioral Health and Social Justice
Healthy Teen Network
HEAR US
National Advocacy Center of the Sisters of the Good Shepherd
National Association for Children's Behavioral Health
National Association of Counsel for Children
National Association for the Education of Homeless Children and Youth
National Association of School Psychologists
National Center for Housing and Child Welfare
National Coalition for the Homeless
National Coalition for Homelessness Solutions
National Diaper Bank Network
National Network to End Domestic Violence
National Network to End Family Homelessness
National Network for Youth
National Title I Association
National WIC Association
NETWORK Lobby for Catholic Social Justice
Ounce of Prevention
Project Rehome
Public Advocacy for Kids
The Ray E. Helfer Society
Salaam Legal Network & Citizens Council for Human Rights
SchoolHouse Connection
School Social Work Association of America
Shriver National Center on Poverty Law