



## DEPARTMENT OF HEALTH & HUMAN SERVICES

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### ADMINISTRATION FOR CHILDREN AND FAMILIES

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## Policies and Procedures to Increase Access to ECE Services for Homeless Children & Families

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Early care and education (ECE) programs provide tremendous benefit to all children, especially our nation's most vulnerable children. Children and their families who experience homelessness deal with a great many challenges. Quality ECE programs buffer the challenges and risks associated with homelessness by supporting children's learning and development in safe, stable and nurturing environments.

Strategies for improving services for young children experiencing homelessness will vary because each of the different funding streams for early childhood education is governed by different laws and regulations. Two of the major federal programs serving young children, Head Start and the Child Care and Development Fund (CCDF), are administered by the Administration for Children and Families (ACF).

This document describes policies and related suggestions for how states and programs can serve homeless children and families through these programs. Some of these ideas are relevant to the administration of both Head Start and CCDF while others are requirements or recommendations specific to each program. We encourage you to take these into consideration as you evaluate your existing policies and procedures.

- **Prioritize Access to Services for Homeless Families:** When deciding eligibility for enrollment in your ECE programs, give homeless families priority status so that homeless children are more likely to receive ECE services. Head Start already has a requirement to prioritize homeless families. While CCDF does not have a similar provision in its regulations, CCDF programs have the flexibility to broaden their eligibility policies to include homeless children and families and are encouraged to do so.
- **Prioritize Families Who Are Temporarily Homeless after a Disaster:** Policies and procedures should ensure that these families have streamlined access to services that are essential to recovery in an emergency situation. For Head Start, any age-eligible child from a family that has had to abandon their home because of a disaster's effects is considered homeless. The Head Start definition of homeless includes families with loss of housing, living in emergency shelters, or residing with friends or relatives. In the case of disaster and emergency situations, Head Start allows a family that does not have the documentation ordinarily required for new enrollments to provide a signed statement attesting to the child's age, which should be included in the child's file. In CCDF, each State has the flexibility to prioritize families made homeless by a disaster and to provide flexibility around necessary documentation.
- **Coordinate Head Start and CCDF Policies:** While Head Start and CCDF are administered differently and have different requirements, they share an important common goal: providing quality early care and education for all children. Given the significant overlap between Head Start and CCDF children, many states have effectively aligned the regulations between the two programs to ensure that services to these vulnerable families are consistent and family-friendly.

Therefore, states are encouraged to design policies and procedures that work for both programs to increase the opportunities for all homeless children to receive high quality ECE.

- **Offer Flexibility to Homeless Families:** Examine the documentation required to enroll in an ECE program and, where appropriate, provide “grace periods” that give families sufficient opportunity to gather required documents, such as proof of income or other financial statements, within a reasonable time frame.
- **Provide Reasonable Flexibility in Meeting Immunization Requirements:** In some States, child care licensing regulations require immunization records prior to enrollment. Current CCDF regulations require Lead Agencies to “establish a grace period in which children can receive services while families are taking the necessary actions to comply with the immunization requirements” unless doing so conflicts with existing state or local law. Currently nearly two-thirds of States either offer some form of grace period in their licensing regulations or flexibility for documenting immunization in their child care subsidy intake process. In cases where state licensing standards do not provide a grace period, there can be a conflict in allowing flexibility to serve homeless children. Head Start allows families of homeless children to benefit from Head Start services while required documents, such as immunization, are obtained within a reasonable time frame. In order to comply with the Head Start requirement of removing barriers to serving homeless children and to also meet state licensing requirements, this means providing Head Start services to children in a mutually agreed upon setting until the child has the documents required to attend a center-based program.

Given the overlap between Head Start and CCDF families, ACF encourages Lead Agencies to work with their child care licensing agency to align policies and establish a grace period for the immunization requirement. We also strongly encourage programs to work closely with families to help them collect the appropriate documentation within a reasonable time frame. While ACF wants to reduce barriers to access, this should be done responsibly to ensure the health and safety of children in Head Start and child care settings.

- **Coordinate with McKinney-Vento State Coordinators for Education of Homeless Children and Youth and Local Education Liaisons:** Per the McKinney-Vento Act, there are State Coordinators of Education for Homeless Children and Youth (EHCY State Coordinators) and local liaisons designated by all Local Educational Agencies (LEAs) in the State. Local liaisons identify homeless children and youth, and connect them to other programs and services such as Head Start, preschool, health care services, dental services, mental health services, and other appropriate services. CCDF Lead Agencies and Child Care Resource and Referral Agencies are encouraged to work with these State Coordinators and local liaisons to ensure that they have information on the full range of child care services available for families. The Head Start Act requires grantees to coordinate with McKinney Vento local liaisons to remove barriers and increase participation of homeless children in the Head Start program. While the McKinney-Vento Act only requires State Educational Agencies (SEAs) and LEAs to provide services to homeless children who are in programs administered by the SEAs or LEAs, the states are free to expand that coverage for all homeless children birth to five years old. For more information, visit the U.S. Department of Education’s Education for Homeless Children and Youth Grants for State and Local Activities website (<http://www2.ed.gov/programs/homeless/contacts.html>), which provides links to regulations, policy guidance, FAQs, and a directory of State Coordinators for the Education of Children and Youth Experiencing Homelessness.

- **Work with Homeless Coalitions:** The ECE community should participate on homeless coalitions which bring together homeless programs with other community organizations. The purpose of these coalitions is to ensure that services available to homeless families (particularly support services beyond housing) reflect the needs of the community. By participating on these coalitions, ECE representatives can ensure that the unique needs of young children are well represented.

### **POLICIES SPECIFIC TO HEAD START**

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- **Prioritize Homeless Children for Enrollment:** The Head Start Act requires that programs assess community needs so they prioritize the highest need children for enrollment. Homeless children have unique and critical needs and are categorically eligible. This means that families experiencing homelessness should be enrolled regardless of income and that programs should make every effort to identify and enroll these children.
- **Allow Homeless Families to Enroll and Receive Services While Waiting for Documentation:** Head Start programs should enroll homeless children and provide Head Start services to the extent possible while waiting for documentation. Programs are encouraged to provide services in a mutually agreed upon location while waiting for documentation that will allow the child to attend a center-based program.
- **Foster Collaboration between Head Start State Collaboration Directors, State Advisory Councils on Early Childhood Education and Care and McKinney-Vento State Coordinators:** To benefit Head Start programs, these entities should support local collaboration to ensure access to services for homeless children. Head Start programs are required to coordinate and work closely with community organizations and particularly the groups mentioned above to ensure that the needs of the community are being met. These organizations can help Head Start programs identify homeless children, and learn best practices and strategies for working with homeless families and children.
- **Partner with Neighboring Grantees to Serve Mobile Homeless Families:** Grantees can establish informal or formal agreements in working with other grantees to serve highly mobile families that are moving into new program service areas.
- **Utilize Program Options that Best Fit Community Needs:** Programs can consider program options that are the best fit for families in communities with high concentrations of families and young children experiencing homelessness. In such communities, full-day, full-year, center-based services in communities may be the best program option.

### **POLICIES SPECIFIC TO THE CHILD CARE AND DEVELOPMENT FUND**

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The Child Care and Development Fund (CCDF) provides states with the flexibility to develop policies that increase access to services for the homeless population. Each state or territory has a Lead Agency that administers CCDF. This list of policy options includes:

- **Offer Priority Eligibility for Homeless Children:** Within current CCDF regulations, States and Territories can establish additional eligibility conditions or priority rules as a method of targeting their programs, as long as federal eligibility criteria are met and the additional conditions or rules

do not discriminate, or limit parental rights. By using the flexibility to define priority categories and vulnerable populations, Lead Agencies can offer priority access to homeless children and in some instances, waive the eligibility requirement for income and the requirement that the parent be working or attending a job training or educational program. Lead Agencies should contact the OCC policy division to learn more about available options for expanding eligibility.

- **Exempt Housing Assistance from Countable Income:** States/Territories have the flexibility to exclude the value of housing assistance when determining income eligibility for CCDF. This means that homeless families do not have to worry about losing their child care subsidy if they accept housing assistance.
- **Waive Co-payments for Low-Income Families:** States have the flexibility to waive co-payments for families if they are living below the poverty line. This provision would eliminate the financial contribution usually required for accessing a child care subsidy. States also have the flexibility to target this policy to a subset of families living in poverty, such as homeless families.
- **Expand the Definition of Working to Include Job Search:** Lead Agencies have flexibility to include “job search activities” in their definition of “work, job training and education activities” that are supported by child care subsidies. Retention of eligibility during a job search can alleviate some of the stress on families, and offer additional stability to homeless families with parents that are looking for both employment and housing. Currently almost two-thirds of all states and territories have adopted this policy.
- **Leverage Job Training in Other Federal Programs:** Many programs that serve the homeless population include job training services (e.g. Supportive Housing Program (HUD), Grants for the Benefit of Homeless Individuals Program (HHS)). Job training is considered a qualifying activity for CCDF eligibility (provided they meet other eligibility criteria). Programs serving homeless families that include a job training component should inform these families that they may be eligible for a child care subsidy. Lead Agencies should coordinate with homeless service providers so that if families are actively pursuing the self-sufficiency activities outlined in those plans, those activities will count as working or job search for CCDF eligibility. If service providers and benefit programs do not coordinate, homeless families can be faced with multiple service plans with which they need to comply to maintain their services and benefits. Failure to coordinate could create a situation where the family is overwhelmed by uncoordinated goals and obligations. By working with homeless agencies to allow some or all of the family’s activities to count for CCDF eligibility, child care subsidy programs can create a more seamless path back to a stable work and living situation for families.
- **Use Grants and Contracts to Build Supply of Child Care for Vulnerable Populations:** Grants and contracts can play an important role in increasing the capacity and provide greater financial stability for providers working with underserved populations. Currently, 21 states use grants or contracts to provide direct child care services. Some already use this strategy to work directly with organizations that serve homeless families and other vulnerable populations to ensure the supply and availability of child care services for the neediest children and families. Since grants and contracts allow Lead Agencies to develop stable partnerships with organizations and build targeted capacity, Lead Agencies are strongly encouraged to use this as a strategy for better serving families experiencing homelessness.