

Aligning Early Childhood Programs to Serve Children Experiencing Homelessness: A Comparison of Preschool, Head Start, and Child Care Policies

Many children in the United States start life without a home: in 2013, over one million children under six were estimated to have experienced homelessness.¹

Infants, toddlers and preschoolers who experience homelessness are at grave risk of developmental delays due to a variety of factors such as a lack of prenatal and early health care, crowded and unsanitary living conditions, poor nutrition, and the trauma caused by severe poverty and unstable living arrangements.² Tragically, homelessness also creates unique barriers to enrolling and participating in early childhood programs, which are known to mitigate the harmful life-long effects of homelessness on education, health and well-being. Common barriers include:

Lack of Awareness:

Early childhood programs may not be aware of family homelessness in their communities. Most families experiencing homelessness stay in a variety of unstable situations, including staying temporarily with other people because they have nowhere else to go, or in motel rooms. These largely hidden living arrangements make outreach and identification a challenge. In addition, homeless service providers often lack awareness of the unique needs of young children, and may not know how to serve them.

High Mobility:

Families in homeless situations frequently are forced to move among temporary living situations. Shelters often limit a family's stay; parents move in search of employment; acquaintances may only be able to provide shelter for a short period of time. Due to the instability of homelessness, families often leave the service area of early childhood programs before their children rise to the top of enrollment waiting lists.

Transportation:

Families experiencing homelessness often do not have vehicles or funds to pay for transportation for their children to attend early childhood programs.

Lack of Documents:

Families experiencing homelessness often lack documents required for enrollment, such as health records, proof of income, and birth certificates, which may result in enrollment being delayed or denied.

¹ [Early Childhood Homelessness in the United States: 50-State Profile](#). January 2016. Administration for Children and Families, U.S. Department of Health and Human Services.

² Perlman, S. (2015). *Access to Early Childhood Programs for Young Children Experiencing Homelessness: A Survey Report*. <http://naehcy.org/sites/default/files/pdf/naehcy-survey-report.pdf>

Preschool, Head Start, and Child Care Policies for Children Experiencing Homelessness

Updated: October 4, 2016

New Preschool, Head Start, and Child Care Policies for Children Experiencing Homelessness

Within the next few months, new federal rules for preschool, Head Start, and child care will go into effect. These rules include many new policies designed to remove barriers and better support young children experiencing homelessness. This convergence and alignment of federal policies represent a critical opportunity for state and local action to better serve our youngest children experiencing homelessness. While the governance and structure of public preschool, Head Start, and Child Care and Development Fund services may differ, we are hopeful that the new emphasis on young children experiencing homelessness will bring communities together to make the most of these new provisions.

To that end, we have developed the chart below, which summarizes the new most significant new rules by topic area, across three federal programs. We will update this document on an ongoing basis to reflect any new guidance or policy clarifications that may be forthcoming.

This publication was written by NAEHCY, in collaboration with the Office of Early Childhood Development at the Administration for Children and Families at the U.S. Department of Health and Human Services; Grace Whitney, Director of the Connecticut Head Start State Collaboration Office; and Carie Bires, Policy Manager, the Ounce of Prevention Fund.

Preschool, Head Start, and Child Care Policies for Children Experiencing Homelessness

Updated: October 4, 2016

	Preschool: Subtitle VII-B of the McKinney-Vento Homeless Assistance Act <ul style="list-style-type: none"> • Reauthorized in 2015 • Non-regulatory guidance published July 2016³ • Administered by the U.S. Department of Education 	The Head Start Act and the Head Start Program Performance Standards <ul style="list-style-type: none"> • The Head Start Act was Reauthorized in 2007 • Regulations (Head Start Program Performance Standards) published September 2016⁴ • Administered by the U. S. Department of Health and Human Services 	Child Care and Development Block Grant Act <ul style="list-style-type: none"> • Authorizes the Child Care and Development Fund (CCDF) • Reauthorized in 2014 • Regulations published September 2016⁵ • Administered by the U. S. Department of Health and Human Services
Applicability	<p>Applies to all local educational agencies (LEAs), including LEAs that do not receive McKinney-Vento subgrant funding. 81 Fed. Reg. 14432 (March. 3, 2016).</p> <p>The McKinney-Vento Act’s preschool provisions apply to all LEA-administered preschool programs, including Head Start programs that are administered by LEAs. 2016 Guidance, N-4.</p> <p>While the term “preschool” is not defined in the McKinney-Vento Act, the definition of preschool used for McKinney-Vento data collection by the U.S. Department of Education is a helpful reference.⁶</p>	<p>Applies to Head Start, Early Head Start, and Early Head Start-Child Care Partnerships Programs. §1302.1.</p>	<p>Applies to all states that receive CCDF funds via the state’s Lead Agency and all child care providers/programs funded by CCDF. §98.13(b)(1).</p>

³ U.S. Department of Education (2016). Education for Homeless Children and Youths Program, Non-Regulatory Guidance.

⁴ U.S. Department of Health and Human Services, Administration for Children and Families (2016). Head Start Program Performance Standards, 45 CFR Chapter XIII.

⁵ U.S. Department of Health and Human Services, Administration for Children and Families (2016). Child Care and Development Fund Program Rules, 45 CFR Part 98.

⁶ “Early childhood education programs for children aged 0-5, funded through tax dollars or other public funds, and for which the LEA is a financial or administrative agent or for which the LEA is accountable for providing early childhood education services.” Examples of preschool programs included in federal data collection include preschool programs operated or administered by an LEA; Head Start programs receiving funding from the LEA or for which the LEA is the grant recipient; preschool special education services, operated or funded by the LEA or mandated under the Individuals with Disabilities Education Act; preschool programs and services administered or funded by the LEA through the use of Title I or similar government grants; or home-based early childhood educational services funded and administered by an LEA.” National Center for Homeless Education (2015). *Guide to Reporting Federal Data*, available at <http://center.serve.org/nche/downloads/data-guide-14-15.pdf>.

Preschool, Head Start, and Child Care Policies for Children Experiencing Homelessness

Updated: October 4, 2016

	Preschool: Subtitle VII-B of the McKinney-Vento Act	The Head Start Act and the Head Start Program Performance Standards	Child Care and Development Block Grant
Funding	<p>\$70 million in FY2016. Funding is allocated by formula to State Educational Agencies (SEAs).</p> <p>SEAs must award competitive subgrants to LEAs based on the need of the LEA and the quality of the proposal. 42 USC §11433(c).</p>	<p>\$9.2 billion in FY2016. Funding is awarded competitively from HHS to qualifying local agencies.</p>	<p>\$5.7 billion in FY2016 (includes discretionary and mandatory funding). Funding is awarded to state agencies in a block grant.</p>
Definition of Homelessness	<p>Children and youth who lack “a fixed, regular, and adequate nighttime residence,” including shelters, transitional housing, unsheltered locations, public places, “sharing the housing of others due to loss of housing, economic hardship, or similar reason,” and living in motels “due to lack of adequate alternative accommodations.”⁷ 42 USC §11434a(2).</p>	<p>Identical definition. §1305.2.</p>	<p>Identical definition. §98.2.</p>

⁷ The term ‘homeless children and youths’—

(A) means individuals who lack a fixed, regular, and adequate nighttime residence (within the meaning of section 103(a)(1)); and

(B) includes--

(i) children and youths who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; or are abandoned in hospitals;

(ii) children and youths who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings (within the meaning of section 103(a)(2)(C));

(iii) children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and

(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).

Preschool, Head Start, and Child Care Policies for Children Experiencing Homelessness

Updated: October 4, 2016

	Preschool: Subtitle VII-B of the McKinney-Vento Act	The Head Start Act and the Head Start Program Performance Standards	Child Care and Development Block Grant
Eligibility	<p>Children and youth who meet the definition of homelessness are eligible for the protections and services of the McKinney-Vento Act. 42 USC §11434a(2).</p>	<p>Children who are age eligible and pregnant women (EHS) who meet the definition of homelessness are categorically eligible for Head Start and Early Head Start programs §1302.12(c)(iii).</p> <p><u>Note:</u></p> <ol style="list-style-type: none"> 1) This means that families who meet homeless eligibility criteria do not also have to meet income guidelines. 2) Categorical eligibility for Head Start and Early Head Start does not mean that homeless children all will be enrolled, because of the limited number of seats/slots. There are more children who are eligible for Head Start than there are enrollment slots available. Therefore, not all eligible children can participate in Head Start and Early Head Start. 	<p>Children are eligible if</p> <ol style="list-style-type: none"> 1) they are under age 13; and 2) their family income does not exceed 85 percent of state median and their family assets do not exceed \$1,000,000; and 3) they reside with a parent or parents who are working or attending a job training or educational program. <p>Children are also eligible if they are receiving, or need to receive, protective services and reside with a parent or parents who are not working or attending a job training or educational program. §98.20.</p> <p>At State option, the income, work, and job training/education requirements may be waived for families, if determined to be necessary on a case-by-case basis. §98.20.</p> <p>States may establish additional eligibility criteria §98.20.</p>

Preschool, Head Start, and Child Care Policies for Children Experiencing Homelessness

Updated: October 4, 2016

	Preschool: Subtitle VII-B of the McKinney-Vento Act	The Head Start Act and the Head Start Program Performance Standards	Child Care and Development Block Grant
Eligibility Determinations	<p>Every LEA must designate a liaison for homeless children and youth who is able to carry out the duties in the law. 42 USC §11432(g)(1)(J)(ii).</p> <p>LEA homeless liaisons are required to ensure that homeless children are identified by school personnel through outreach and coordination with other entities and agencies. 42 USC §11432(g)(6)(A)(i).</p> <p>Liaisons must participate in professional development offered by the SEA, as deemed appropriate by the State Coordinator. 42 USC §11432(g)(1)(J)(iv).</p> <p>The State Coordinator must provide professional development for liaisons that includes information on federal definitions of homelessness. 42 USC 11432(f)(6).</p> <p>Determinations should be individualized and made on a case-by-case basis.⁸</p>	<p>Age eligible children for EHS (birth to 3) HS (3-5) and pregnant women who are also determined to be homelessness are eligible. §1302.12(b)(c).</p> <p><u>Note:</u> A program’s policies cannot require families to provide documents that confirm a child’s age if it is a barrier to the child’s enrollment. §1302.12(h).</p> <p>§1302.12(i)(3) To verify whether a family is homeless, a program may accept a written statement from a homeless services provider, school personnel, or other service agency attesting that the child is homeless, or any other documentation that indicates homelessness, including documentation from a public or private agency, a declaration, information gathered on enrollment or application forms, or notes from an interview with staff to establish the child is homeless, or any other document that establishes homelessness. However, if a family can not provide these documents, staff can document efforts made and provide a written statement as such.</p> <p>Programs must keep eligibility determination records for each participant §1302.12(k)(1) and must provide eligibility training for staff. §1302.12(m).</p>	<p>Lead Agencies must describe in their state Plan the procedures that are in place for documenting and verifying that children receiving assistance meet eligibility criteria at the time of eligibility determination and redetermination. §98.68(c).</p> <p>A child meeting eligibility requirements at the most recent eligibility determination or redetermination is considered eligible during the period between redeterminations. §98.21.</p>

⁸ “Determining Eligibility for Rights and Services Under the McKinney-Vento Act,” National Center for Homeless Education, http://center.serve.org/nche/downloads/briefs/det_elig.pdf

Preschool, Head Start, and Child Care Policies for Children Experiencing Homelessness

Updated: October 4, 2016

	Preschool: Subtitle VII-B of the McKinney-Vento Act	The Head Start Act and the Head Start Program Performance Standards	Child Care and Development Block Grant
Identification and Outreach	<p>LEA homeless liaisons are required to ensure that homeless children are identified by school personnel through outreach and coordination with other entities and agencies. 42 USC §11432(g)(6)(A)(i).</p> <p>Liaisons also must disseminate public notice of McKinney-Vento rights in locations frequented by parents, guardians, and unaccompanied youth, in a manner and form understandable to parents, guardians, and youth. 42 USC §11432(g)(6)(A)(vi).</p> <p>States and LEAs must review and revise policies to remove barriers to the identification of homeless children and youth. 42 USC §11432(g)(1)(I).</p>	<p>Programs are required to identify homeless children. 42 USC 9835(m).</p> <p>Programs must develop and implement a recruitment process designed to actively inform all families with eligible children within the recruitment area of the availability of program services, and encourage and assist them in applying for admission to the program. Programs must include specific efforts to actively locate and recruit children with disabilities and other vulnerable children, including homeless children. §1302.13.</p>	<p>Lead Agencies must expend funds on activities that improve access to quality child care services for children experiencing homelessness, including training and technical assistance for providers and appropriate Lead Agency (or designated entity) staff on identifying and serving children experiencing homelessness and their families; and specific outreach to families experiencing homelessness. §98.51(b)-(c).</p>

Preschool, Head Start, and Child Care Policies for Children Experiencing Homelessness

Updated: October 4, 2016

	Preschool: Subtitle VII-B of the McKinney-Vento Act	The Head Start Act and the Head Start Program Performance Standards	Child Care and Development Block Grant
Expedited Enrollment	<p>LEAs are required to immediately enroll homeless children and youth, even if children have missed application or enrollment deadlines during any period of homelessness, or even if they do not have required documents, such as school records, records of immunization and other required health records, proof of residency, guardianship, or other documents. 42 USC 11432(g)(3)(C).</p> <p>If a student does not have immunizations, or immunization or other health records or screenings, the liaison must immediately assist in obtaining them; the student must be enrolled in the interim. 42 USC §11432(g)(3)(C)(iii).</p> <p>Enrollment means attending classes and participating fully in school activities. 42 USC §11434A(1).</p> <p>States and LEAs must review and revise policies to remove barriers to the education of homeless children and youth, “including barriers to enrollment and retention due to outstanding fees or fines, or absences.” 42 USC §11432(g)(1)(I).</p>	<p>Programs must allow homeless children to attend for up to 90 days or as long as allowed under state licensing requirements, without immunization and other records, to give the family reasonable time to present these documents. Programs must work with families to get children immunized as soon as possible to meet state licensing. 1302.16(c)(1).</p> <p>§1302.15(c) If a program determines from the community assessment that there are families experiencing homelessness in the area, or children in foster care that could benefit from services, the program may reserve one or more enrollment slots for pregnant women and children experiencing homelessness and children in foster care, when a vacancy occurs. No more than 3 percent of a program’s funded enrollment slots may be reserved. If the reserved enrollment slot is not filled within 30 days, the enrollment slot becomes vacant and the Program must fill it within 30 days.</p>	<p>Lead Agencies must establish a grace period that allows children experiencing homelessness and children in foster care to receive services while providing their families (including foster families) a reasonable time to take any necessary action to comply with immunization and other health and safety requirements. §98.41(a)(1)(i)(C).</p> <p>Lead Agencies must coordinate with licensing agencies and other relevant State and local agencies to provide referrals and support to help families of children receiving services during a grace period comply with immunization and other health and safety requirements. §98.41(a)(1)(i)(C)(3).</p> <p>Lead Agencies must expend funds on activities that improve access to quality child care services for children experiencing homelessness, including the use of procedures to permit enrollment (after an initial eligibility determination) of children experiencing homelessness while required documentation is obtained. §98.51(a).</p>

Preschool, Head Start, and Child Care Policies for Children Experiencing Homelessness

Updated: October 4, 2016

	Preschool: Subtitle VII-B of the McKinney-Vento Act	The Head Start Act and the Head Start Program Performance Standards	Child Care and Development Block Grant
<p>Expedited Enrollment, (Continued from previous page)</p>			<p>If, after full documentation is provided, a family experiencing homelessness is found ineligible, the Lead Agency must pay any amount owed to a child care provider for services provided as a result of the initial eligibility determination. Any CCDF payment made prior to the final eligibility determination will not be considered an error or improper payment. §98.51(a)(1).</p> <p>Lead Agencies must give priority for child care services to children experiencing homelessness. §98.46 (a)(3).</p> <p>A penalty of five percent of the funds allotted under §98.61 (i.e., the Discretionary Funds) for a Fiscal Year shall be withheld for any For Fiscal Year the Secretary determines that the Lead Agency has failed to give priority for service in accordance with §98.46(a); §98.92(b)(3)(i).</p> <p><u>Note:</u> For important context on the conditions around penalty, see §98.92(b)(3)(ii) through (iv).</p>

Preschool, Head Start, and Child Care Policies for Children Experiencing Homelessness

Updated: October 4, 2016

	Preschool: Subtitle VII-B of the McKinney-Vento Act	The Head Start Act and the Head Start Program Performance Standards	Child Care and Development Block Grant
Continuity/Stability	<p>LEAs are required, according to each child’s best interest, to continue the student’s education in the school of origin for the duration of homelessness, and until the end of the academic year in which the student becomes permanently housed; or enroll the child in any public school that housed students living where the student is living are eligible to attend. 42 USC §11432(g)(3)(A).</p> <p>“School of origin” is defined as the school attended when permanently housed or school in which last enrolled, including a preschool. 42 USC §11432(g)(3)(I).</p> <p>In determining best interest, LEAs must presume that keeping the student in the school of origin is in the student’s best interest, unless contrary to the request of the parent, guardian, or unaccompanied youth.</p> <p>LEAs also must consider student-centered factors, including the impact of mobility on achievement, education, health, and safety. School districts also must give priority to the parent’s/guardian’s/unaccompanied youth’s request. 42 USC §11432(g)(3)(A).</p> <p>In determining the best interest of preschoolers, LEAs also should consider attachment to teachers; availability and quality of services in the new area; and travel time, among other factors. 2016 Guidance, N3.</p>	<p>If a program serves homeless children or children in foster care, it must make efforts to maintain the child’s enrollment regardless of whether the family or child moves to a different service area, or transition the child to a program in a different service area, according to the family’s needs. §1302.15(b)(3).</p> <p>For families and children moving out of the community in which they are currently served, including homeless families and foster children, Head Start programs must undertake efforts to support effective transitions to other Early Head Start or Head Start programs. If Early Head Start or Head Start is not available, the program should assist the family to identify another early childhood program that meets their needs. §1302.72(a).</p>	<p>Children maintain eligibility for a minimum of 12 months, regardless of increases in parents’ earnings (as long as income remains at or below the Federal eligibility limit) and temporary changes in participation in work, training, or education. §98.21.</p>

Preschool, Head Start, and Child Care Policies for Children Experiencing Homelessness

Updated: October 4, 2016

	Preschool: Subtitle VII-B of the McKinney-Vento Act	The Head Start Act and the Head Start Program Performance Standards	Child Care and Development Block Grant
Transportation	<p>If remaining in the school of origin (including preschool⁹) is in the child’s best interest, the LEA must provide transportation to and from the child’s school of origin at the request of the parent or guardian. 42 USC §11432(g)(1)(J)(iii).</p> <p>In addition, LEAs must provide comparable transportation services. 42 USC §11432(g)(4)(A).</p> <p>LEAs are required to remove barriers to enrollment and retention for homeless children. This includes transportation barriers. 42 USC §§11432(g)(1)(I), (g)(7).</p>	<p>§1302.16(c)(2). If a child experiencing homelessness is unable to attend classes regularly because the family does not have transportation to and from the program facility, the program must utilize community resources, where possible, to provide transportation for the child.</p>	<p>No specific transportation provisions for children experiencing homelessness.</p>

⁹ “Preschool” includes Head Start programs that are administered by LEAs. 2016 Guidance, N-4. See footnote 6 for the McKinney-Vento data collection definition of preschool.

Preschool, Head Start, and Child Care Policies for Children Experiencing Homelessness

Updated: October 4, 2016

	Preschool: Subtitle VII-B of the McKinney-Vento Act	The Head Start Act and the Head Start Program Performance Standards	Child Care and Development Block Grant
<p>Collaborations to Ensure Access and Services</p>	<p>LEA liaisons must ensure that homeless families and homeless children have access to and receive services through Head Start programs (including Early Head Start programs), and, if eligible, early intervention services under part C of the Individuals with Disabilities Education Act, and other preschool programs administered by the local educational agency. 42 USC §11432(g)(6)(A)(iii).</p> <p>State McKinney-Vento plans must describe procedures to ensure that preschoolers experiencing homelessness have access to public preschool programs administered by the State educational agency or local educational agency. 42 USC §11432(g)(1)(F)(i).</p> <p>State McKinney-Vento coordinators must coordinate with agencies that serve preschoolers, including child development and preschool personnel, to improve the provision of comprehensive services to children. 42 USC §11432(f)(4).</p>	<p>Each Head Start program must establish channels of communication between Head Start staff and McKinney-Vento liaisons to facilitate coordination of programs. 42 USC §9837a(a).</p> <p>Head Start programs must establish necessary collaborative relationships and partnerships with community organizations that may include housing assistance agencies and providers of support for children and families experiencing homelessness, including the local educational agency liaison designated under the McKinney-Vento Homeless Assistance Act. §1302.53(a)(2)(vi).</p> <p>The State Director of Head Start Collaboration must develop a strategic plan that will enhance collaboration and coordination of Head Start services by Head Start agencies with other early childhood education and development for limited English proficient children and homeless children. 42 USC §9837b(a)(4).</p>	<p>Lead Agencies must coordinate the provision of child care services with other Federal, State, and local child care and early childhood development programs (including programs for the benefit of children experiencing homelessness) to expand accessibility and continuity of care as well as full-day services. §98.14(a)(1).</p> <p>Lead Agencies must coordinate the provision of services with the state, and if applicable, tribal agencies responsible for services for children experiencing homelessness, including State Coordinators of Education for Homeless Children and Youth (EHCY State Coordinators) and, to the extent practicable, LEA homeless liaisons and Continuum of Care Grantees. §98.14(a)(1)(xi).</p>

Preschool, Head Start, and Child Care Policies for Children Experiencing Homelessness

Updated: October 4, 2016

	Preschool: Subtitle VII-B of the McKinney-Vento Act	The Head Start Act and the Head Start Program Performance Standards	Child Care and Development Block Grant
<p>Referrals and Services</p> <p><u>Note:</u> Under Title I, Part A of the Elementary and Education Act, LEAs that choose to use Title I funds to provide early childhood education services to low-income children below the age of compulsory school attendance must ensure that such services comply with the performance standards established under section 641A(a) of the Head Start Act. 20 USC §6312(c)(7).</p>	<p>LEA homeless liaisons must make referrals to health care, dental, mental health, substance abuse, housing and other services. 42 USC §11432(g)(6)(A)(iv).</p>	<p>Programs must provide comprehensive services, including screenings, health, dental, and mental health, to every enrolled child. §1302.20(b).</p> <p>Programs are required to provide a broad range of opportunities and services to all parents to support family wellbeing parent involvement in the program and family engagement around children’s learning and development. §1301 and §1302.</p>	<p>States may use CCDF funds to support a system of child care resource and referral organizations that can provide consumer education to parents/caregivers, training and technical assistance to providers, and collect and analyze data. §98.52.</p> <p>States must collect and disseminate information about the availability of the full diversity of child care services that will promote informed child care choices, including other programs for which families that receive child care services may be eligible (including Head Start and Early Head Start, IDEA Part B and Part C programs, TANF, SNAP, and WIC). States must also provide information on how to access developmental screening. §98.33(a).</p>
<p>Parental Involvement/Family Engagement</p>	<p>LEA homeless liaisons must ensure that parents are informed of the educational and related opportunities available to their children, and are provided with meaningful opportunities to participate in the education of their children. 42 USC §11432(g)(6)(A)(v).</p>	<p>Programs must integrate parent and family engagement strategies into all systems and program services to support family well-being and promote children’s learning and development. §1302.50(a).</p>	<p>Lead Agencies must describe how they support child care providers in the successful engagement of families in children’s learning and development. §98.16(gg).</p> <p>States must provide consumer and provider information that includes research and best practices related to meaningful parent and family engagement. §98.33(b)(1)(iv).</p>