

# Notes from WSA Conference Call 3/12/08

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## ***New Head Start Homeless Regulations***

**Guests:** Barbara Duffield of the National Association of Homeless Children and Youth  
Melinda Dyer with OSPI

### **Overview**

We've been getting a lot of questions about how the new language in the Head Start act about homeless children and families will affect programs.

- What is in the act?
- What will it mean to programs?
- What should regulations look like?
- How should programs start to engage homeless families in a more active way?

Children have faced some barriers in the past in getting into Head Start. Moving from place to place, mobility issues kept coming up as factors that restrict access. Proof of income issues, documentation and transportation are other major barriers. How can children keep their place if they move. Right now, homeless issues may or may not be part of community needs assessment and recruiting in Head Start, but with the passage of the new Head Start Act, programs will need to include a plan to address these issues.

One piece of the reauthorization is defining who we are talking about. The HS act includes a definition of 'homeless' for the first time. It's the same definition public schools use, and is also in McKinney Vento.

Important note: The definition of homelessness is broad. It includes children without fixed address, but not necessarily in shelters. These families are harder to identify, but include most of the homeless category (55-60% in WA). It also includes children living in camping areas, trailer parks, etc 'due to lack of adequate housing'.

### **McKinney Vento Act**

A lot of the language in the HS Reauthorization refers to McKinney Vento. Key points about McKinney Vento:

- Governs school enrollment of homeless pre-K-12.
- Every school district has to identify a liaison, with the responsibility of identifying homeless in the community. These people are key to finding the homeless children. They also have responsibility to ensure that young children have access to Head Start and other school-sponsored pre-K. Head Start is already mentioned in M-V Act, and now the HS Act reciprocates.

- It covers public preschool programs. The thrust of the legislation is to remove barriers to enrollment, and keeping kids stable as they move from place to place.
- Transportation – for school-age children school districts are required to provide transportation, even across school district lines. For pre-school transportation, SD’s must provide ‘comparable’ services, and work to remove barriers. It’s not as clear or prescriptive as the school-age piece.

## Head Start Act

One of the big changes in the new Act is that homeless children are now categorically eligible for Head Start. In fact, in order to serve children above 100% FPL, programs need to make sure that both children below the poverty line and homeless children are served *first*.

2<sup>nd</sup> big provision – Regulations will be issued to implement policies and procedures that: 1. ensure *priority* for homeless children; and 2. allow families to apply/attend while documents are being obtained.

Some issues that we know will come up with those regulations:

- What are the **identification** procedures going to be? How does that look for HS? How to programs go about identifying homeless families outside of shelters and transitional housing?
- **Prioritization** – what methods can or should be used? The report language does discuss this.
- **Enrollment & documentation**– the act allows families to enroll while documents are obtained ‘within a reasonable time frame’. What time frame is reasonable?
- **Placement stability** and service areas – if we know that one of the barriers is mobility, how will we ensure that services are still available when kids move?
- There’s now an expectation to maintain 97% enrollment. There is a provision that says that if serving highly mobile children is a factor, the secretary can waive penalties for enrollment shortfall.
- There are a lot of collaboration requirements, training/TA requirements, data collation and reporting requirements, etc.

Melinda – some of the transportation comparability issues are more challenging with Head Start, since those programs aren’t necessarily part of the school district.

## Question & Answer/Comments

Joel – what are the immediate impacts on HS programs over the next few months?

There’s an awareness piece. We have a ways to go to clarify who are these homeless kids, how do we work with the liaison, etc. Since there hasn’t been any guidance from Office of Head Start, it’s uncertain.

In the coming months WA programs should expect communication and information as we move into the new regulations. Some HS folks are very familiar with homeless regulations. Better coordination between Head Start and OSPI should be expected.

Joel – is it correct to say that transportation requirements apply only to public schools?

Yes, if a HS program is in a school, McKinney Vento applies. In 2009, McKinney Vento may be reauthorized and address the issue of pre-school transportation in more detail.

The Head Start regulations may speak to the transportation issue, but we don't know anything specific yet for agencies not administered by a school.

Joel – do you anticipate any difficulty around the section dealing with documentation?

The only concern that has been raised is in the conflict with licensing department. Immunizations, for example. Children could start without documentation.

Vicky Baker – We have a few sites that we provide transportation for, and for those sites the school district provides the transportation. Would M-V apply to us then, although we are not part of the school district?

They would probably need to do the same for the kids who are homeless. You should do your best to advocate for that service to continue if those kids move around.

Barbara - I get a fair number of questions about transportation to child care facilities at the end of the day. Often a child care is a safer drop off location than a temporary residence of the child.

Linda, PSESD - I'm wondering about the impact of the HS transportation regulations. Our transportation costs have gone up a lot, and some of the ways that older children can be transported creatively aren't available for pre-school children (cabs, volunteer parents). Head Starts can't assist parents in transportation costs, since they don't meet the new HS transportation regs.

I'm not familiar with the HS regs. It sounds like the HS regs will greatly limit homeless access, and this is something that should be discussed in the regulation process.

Barbara - The issue of reaching homeless families who aren't in shelters – is that part of Head Start's needs assessment and recruitment patterns in WA, or will that be new?

Not new in Seattle-Tacoma area, since we've been using M-V definition all along.

We have another issue around removing barriers. With respect to collecting documentation in a reasonable amount of time, if homeless families are categorically eligible, what do we need to document in terms of their income?

You may not need to worry as much about income as about verifying that the family is homeless.

The health documentation issue raises a concern. If we don't have info about shots, asthma, etc could be dangerous while the kids are in our program, eating our food, etc.

How do you verify that someone is homeless? We have a lot of families that share their homes throughout the tribe. It's like a way of life. How do we verify that they are actually homeless? Is it that they're sharing because they're evicted?

The legal definition is that they're sharing because of economic hardship, loss of housing, or lack of long-term stability. It's really case-by-case. Often we have families that don't see themselves as being homeless, but they fit into the law. It's good to let them know that they can access the services, even if they don't want to. In data collection, those families need to be counted even if they're not accessing the service.

Could people on the call share what they have done to break down barriers?

- PSESD - In our program we've changed our selection policy to reflect our priority for homeless families. They go to the top of the wait list. Because of capacity, that doesn't always mean they're served immediately, but they're served as soon as there is an opening.
- PSESD - we added the residency question to our application, and our income verification documents also now indicate that those families are categorically eligible.
- Two of PSESD's centers are located within transitional housing centers, and other programs are required to reach out to all social service agencies, including those that serve the homeless. Transportation is the biggest barrier.

Barbara - There may need to be some re-thinking about the type of educational or classroom experience, if you have a large number of homeless children. There may need to be a retraining of staff with respect to designing the classroom, activities, etc.

Cathy Garland - we serve full-day, full year EHS and HS classrooms that we also get child care subsidy for. We may also need to coordinate with that - there are requirements that children can't be absent more than 5 days a month, and with the highly mobile population that could create a financial issue for programs.

There are state and federal dollars available for child care services for homeless.

Some families have been successful in accessing the local provider of those homeless childcare services. It would be helpful if there could be some collaboration that would make that transition smoother.

Are people in 'transitional housing' considered homeless, even if they've been there for more than 18 months?

Yes, they are considered homeless.

Joel - how do you envision OSPI working with HS-SCO on these issues?

In the past it has not been a strong partnership, but with the new regs there are expectations that we would work more closely, starting with relationship building and sharing of information.

We will send out notes and Barbara's PowerPoint.