

**Report on Results from CDD Survey on Homelessness
November 18, 2016**

A survey to a group of child care programs was distributed to Head Start programs (7), Parent Child Centers (16), and Strengthening Families Child Care Center grantees (33) through the Vermont Child Development Division (CDD) in May, 2016. These programs were selected for the survey because they are committed to serving vulnerable children and their families. The survey was intended to gather information on any CDD policies that may have negative consequences for families experiencing homelessness. Twenty-four responses were returned from the survey.

The legal definition of homelessness provided in an introduction, was:

According to section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), the term “homeless children and youths” —

(A) means individuals who lack a fixed, regular, and adequate nighttime residence...; 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 accommodations; are living in emergency or transitional shelters; are abandoned in hospitals; or are awaiting foster care placement;

(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;

(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 who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (i) through (iii).

Children and youth are considered homeless if they fit both part A and any one of the subparts of part B of the definition above.

Of the survey responses received, 83% of respondents reported that they were currently serving families experiencing homelessness. Three respondents reported that they found barriers related to licensing regulations in providing services to children and families experiencing homelessness. These barriers included challenges in gathering the required enrollment

documentation related to well-child visits and immunizations, having two emergency contacts, and transportation within 30 minutes.

Nine respondents out of 24 reported that they found barriers related to child care financial assistance rules in providing services to children and families experiencing homelessness. The barriers that were stated include that families do not have a physical/ mailing address, no access to some of the required documentation such as pay stubs if they don't have a place to keep those, the copay between what the Child Care Financial Assistance program pays and what the program charges is often difficult, there are not enough allowable absences, that children can't come due to a lack of transportation, and "Families who are homeless do not always seem to meet the criteria for assistance" .

The survey also asked participants to identify any low cost/no cost support that the Child Development Division could provide in supporting programs in serving children and families experiencing homelessness. These responses include:

- Allow for categorical eligibility and don't require the documentation;
- Provide training for staff on client's rights, housing, appeals process, staying and eviction;
- Provide steps to move forward with housing;
- Access to washers and dryers;
- Emergency gas and grocery cards;
- Transportation to preschool;
- Not requiring two emergency contacts especially in situations of domestic violence or substance abuse;
- Provide 3-6-month transition period where services continue until life returns to normal;
- Change attendance requirements so that programs hold spots for children in these circumstances;
- Professional development around trauma, etc related to homelessness; and
- Leniency in regulations for these families.

The Child Development Division program staff reviewed the survey results to determine if policies should be reviewed related to the feedback that was received. It was found that many of the barriers identified are perceived barriers and not true barriers to participation. Guidance on these items will be provided in the guidebooks that are being created to accompany the new licensing regulations.

With regard to the suggestions for the Child Care Licensing program, the feedback was primarily around paperwork in children's files.

Solution: When a program is aware that a family is dealing with housing instability, program staff should enter a note to that effect in the child's file. Programs should do

their best to provide either direct support or referrals to support services to ensure children are up to date with well-child visits and immunizations. Licensing staff inspecting children's files on a site visits will ask for updates on missing information but violations related to documentation will not be cited for children in families experiencing homelessness.

In reference to emergency contacts, program staff can volunteer to be designated as emergency contacts for families experiencing homelessness so that they can support these children and families when unexpected crises occur.

When a program is providing transportation, licensing regulations do limit travel to or from a child's home or school to 45 minutes one way. If a program needs to transport a child for a greater distance that that because the family's housing is not secure and they have had to move, the program can request a variance for that child and family.

Below are clarifications regarding the feedback received on the Child Care Financial Assistance Program (CC FAP):

- No physical/mailling address.
CDD Response: This is not a barrier to participation. Families can use the address of a relative, the child care program itself, a state office address, etc. Child care program staff should work with families and CC FAP eligibility specialists to identify an appropriate mailing address. Families do need to list a contact phone number where a message can be left for the parent.
- No access to some of the required documentation such as pay stubs if they don't have a place to keep those.
CDD Response: In CC FAP, there is a category of service need called Family Support which is intended to help families experiencing highly stressful challenges. There is no income test for this category so no pay stubs are required. Homeless families are categorically eligible for assistance in this category which is a 100% benefit.
- Copay is often difficult
CDD Response: The state recognizes this as a challenge for all low-income people because our rates (established by the availability of funding) have not kept up with the cost of child care. Most communities have access to flexible funding on a short-term basis through Parent Child Centers. Some programs (such as Head Start and Strengthening Families Child Care grantees) do not require co-payments from families with 100%benefit in CC FAP.
- Sometimes there are not enough allowable absences. Sometimes they can't come due to lack of transportation.
CDD Response: There is quite a bit of flexibility in CCFAP in this regard. If a child attends one day a week, the program will be paid for the entire week. Families can ask for up to a 30-day hold on the slot if a family is experiencing challenges that prohibit attendance of a child for long periods.

- “Families who are homeless do not always seem to meet the criteria for assistance”
CDD Response: Sometimes families do not reveal that they are homeless. A new checkbox has been added to the CCFAP application which should help identify this circumstance and expedite eligibility.

CDD will post clarifications related to challenges faced by homeless families participating in CC FAP, and the programs that serve them, on the CDD website as a reference. Training for programs on serving children and families experiencing the trauma of homelessness will also address these clarifications.

Regarding the low cost/no cost suggestions,

- Allow for categorical eligibility and don't require the documentation.
CDD Response: Homelessness is considered categorical eligibility for Family Support Child Care. Family Support Child Care does not require the same level of documentation although because it is a Federal program, some documentation is still required.
ACTION: The CDD will contact the Reach Up program to make sure workers contact CIS Child Care Coordinators to support this process.
- Provide training for staff on client's rights, housing, appeals process, staying and eviction.
CDD Response: This is something that the CDD will be working on in the next year.
ACTION: The CDD is working with the Office of Economic Opportunity to provide training to child care programs in the next 6 months.
- Access to washers and dryers.
CDD Response: While this is not something the CDD can require, some child care providers do provide access to washers and dryers at their programs.
- Emergency gas and grocery cards
CDD Response: Supports for these services are often provided through local Community Action agencies, Parent Child Centers and the Reach Up program.
- Transportation to preschool.
CDD Response: There are some transportation services available for individuals qualifying for Family Support financial assistance through Children's Integrated Services Specialized Child Care. Local CIS Child Care Coordinators have information on these services in AHS regions.
- Not requiring two emergency contacts especially in situations of domestic violence or substance abuse.
CDD Response: It is important to have the contact information for individuals known to the child/family in case of a family emergency, even if it is not someone who may come to the program. The program may need to get in contact with someone on behalf of a

child. This is not the same as an authorization to have any other responsibility for the child.

- Provide 3-6-month transition period where services continue until life returns to normal.
CDD Response: Once children and families are deemed eligible for CC FAP, eligibility extends for a full twelve months..

- Change attendance requirements so that programs hold spots for children in these circumstances

CDD Response: Absence policies allow for quite a lot of short term absence. Programs can request to hold individual slots for up to 30 days with no attendance.

- Professional development around trauma, etc related to homelessness

CDD Response: Agreed – CDD is working with OEO and others to plan and provide this.

ACTION: The CDD will be providing professional development related to serving children and families who are homeless as well as trauma.

- Leniency in regulations for these families.

CDD Response: It is best to check with your Child Care Licensing Field Specialist or the CCFAP Program Administrator when individual circumstances arise. It is our intent to provide maximum support children in families experiencing homelessness

In summary, the Child Development Division has planned action steps to ensure that challenges and barriers for early care and learning and afterschool providers serving children and families experiencing homelessness are overcome. Where information and communication are a problem, we will proactively clarify our policies and practices. CIS Child Care Coordinators in AHS regions provide a resource for collaborative support for families experiencing homelessness. CDD is working with OEO to develop and offer training for programs on working with families experiencing homelessness and trauma. CDD remains open to hearing and addressing any additional barriers or challenges programs are experiencing related to serving homeless families.