



HORIZONS FOR HOMELESS CHILDREN

November 23, 2010

Administration for Children and Families
Office of Administration
Office of Information Services
370 L'Enfant Promenade SW
Washington, DC 20447

ATTN: ACF Reports Clearance Officer

To Whom It May Concern:

Thank you for the opportunity to comment on the Child Care and Development Fund Plan preprint for FFY 2012-2013. The revised preprint represents an improvement over previous versions, both in its format and its renewed focus on incorporating strong quality rating and improvement (QRIS) and early learning systems in child care delivery. However, given our country's persistent economic woes and the lasting harm of homelessness on children, we encourage ACF to recognize the special needs of young homeless children and the steps states have taken to include them as a priority population.

Founded in 1988, Horizons for Homeless Children is a non-profit provider of early education and child care for young homeless children, aged 0 to 6, in Massachusetts. Over the last 20 years, our Community Children's Centers have served thousands of young homeless children in Boston. In an attempt to stabilize the entire family and help them transition out of homelessness, HHC also connects parents to services, including: GED classes, parenting workshops and job training programs. Our teachers not only care for children, but our family advocates support their parents – often single mothers – to enable them to transition from the shelter system to a home and career.

In addition to the children we serve at our CCCs, HHC engages thousands of children each week in educational play at family homeless shelters across the state through our "Playspace Program." Under the direction of trained caregivers, Playspaces provide homeless children with a nurturing environment in which place to learn, play with other children and enjoy themselves while living in a shelter.

Since 2002, our Training and Technical Assistance Program has held workshops across the country to educate social service providers, early education, child care and shelter staff on the needs of young homeless children. HHC has presented at 100 local and national conferences, and worked with dozens of service providers to improve access and quality for child care and early education programs serving homeless children.

There is an urgent need across the country for quality child care and early education for young homeless children. In 2009, it was estimated that 1.5 million children, or one in 50, experienced homelessness over the course of the year. In light of the foreclosure crisis and persistent unemployment, it is likely that this number is higher today. While the McKinney-Vento Homelessness Assistance Act ameliorates some of the effects of homelessness on school-aged children, the impact of homelessness falls particularly hard on the very young, for whom homelessness can contribute to or exacerbate critical delays in physical, mental, and emotional development. At the same time, parents with young homeless children are unable to take important steps towards economic independence, such as pursuing an education, holding down a job, or finding a place to live, if they cannot place their children in quality child care programs.

Unfortunately, children who are most in need of early education and care are often the least likely to receive it. In Massachusetts, results of our most recent survey showed that fewer than half of children in homeless shelters around the state were accessing early education and child care.

A number of states have recognized the risks that homelessness poses to a child's development and have included children living in homeless shelters in their definitions of children in protective services, one of the federal priority categories. We believe that the redraft of the CCDDF preprint offers an opportunity to remind state agencies of this option. Unfortunately, the word "homeless" does not appear once in the current preprint.

We support the change in the preprint from an open-ended questionnaire to a more direct format, and we would encourage ACF to take this approach in question 2.2.4, "Eligibility Criteria Based Upon Receiving or Needing to Receive Protective Services." Specifically, we urge ACF to mention homeless shelters as interventions that could fall into the definition of protective services.

In addition to the emphasis on multiple choice questions, we value the emphasis on questions relating to access, continuity of care, and communication with the parents. We also support the renewed focus on outcomes, such as 2.1.4 ("Describe how the Lead Agency supports child care programs to increase the likelihood that CCDF-served children receive higher quality care") and 2.1.9 "Does the Lead Agency monitor the timeliness of eligibility determinations/re-determinations?"

Currently Section 2.4, Prioritizing Services for Eligible Children and Families, highlights the minimum requirement that Lead Agencies give priority to children with special needs, or in families with very low incomes. We would encourage you to amend the language in this section to remind state administrators that young homeless children can (and, in our view, should) be enumerated as belonging to these categories. The reality is that the "families with very low incomes" label does not adequately encompass homeless families as they often have no income, and as such these vulnerable families encounter significant obstacles as they try to access adequate child care for their young children. Without access to critical child care programs, these families are often unable to find

their way out of homelessness and into stable employment, housing, and mental and physical health care.

Likewise, we suggest that Question 2.2.4, Eligibility Criteria Based Upon Receiving or Needing to Receive Protective Services, be modified to include reference, as with children in foster care, to children in homeless shelters as a potential subset of children in protective services. This appears to be the way that states have treated prioritization of homeless children to date, though unfortunately just a handful of states have enumerated young homeless children as being a priority population. According to the summary of CCDF state profiles, only six states explicitly include homeless children in their definition of “children in protective services.”

Given this increased focus on outcomes, we were surprised to find that question 3.4.6 from the 2010-11 preprint was not included in the new version. This question asked whether the Lead Agency maintains a waiting list of eligible families that they are unable to serve and asks how the agency ensures that the list is kept current. As you are aware, even with increased funding under ARRA and TANF in recent years, the need for child care vouchers often exceeds the number that can be made available. Proper maintenance of waiting lists in these situations is critical, especially for priority populations such as children in protective services.

Horizons for Homeless Children is pleased to see an increased focus on quality improvement in the preprint. While previous preprints have recognized health and safety standards and early learning guidelines, the addition of the Quality Rating and Improvement System (QRIS) and the new focus on professional development and workforce initiatives will help improve child care and early education across the country.

To this end, the introduction of a planning process, self-assessment, and annual progress report is another outcome-focused improvement in the new preprint that Horizons for Homeless Children supports. While there may be some concern by Lead Agencies about the additional reporting burdens requested in the new preprint, the questions asked in the progress report are ones that an effective agency should be tracking already.

We encourage ACF to consider adding a question to the progress report asking how many children are in protective services or other priority categories. Our experience with the homeless community in Massachusetts and across the United States has shown that young homeless children most in need of intervention are, tragically, the most difficult to identify and track. In particular, please consider adding questions about homeless children and/or children in other priority categories to progress report question 2.2.1., asking how many children are served by programs implementing early learning guidelines, and question 3.2.6., asking how many CCDF subsidized children are enrolled in programs that participate in the state or territory’s quality improvement system.

We hope you will find these comments useful. Please do not hesitate to contact us if you have questions or would like more information about Horizons and the population we serve. We appreciate the opportunity to comment on the proposed preprint.

Sincerely,

Asa Fanelli
President