

**National Association for the Education of Homeless Children and Youth  
National Health Care for the Homeless Council  
National Policy and Advocacy Council on Homelessness  
Volunteers of America**

**Questions and Answers About  
Expanding HUD's Definition of Homelessness**

To date, over seventy national, state, and local coalitions – including homelessness, housing, domestic violence, veterans, youth, and faith-based organizations have endorsed the call for the U.S. Department of Housing and Urban Development (HUD) to adopt a definition of homelessness that is more closely aligned to other federal definitions of homelessness. This document answers the most frequently asked questions about the campaign to modify HUD's homeless definition and includes a list of current endorsers.

**Why Do So Many Advocates and Service Providers Support a Broader HUD Definition of Homelessness?**

- The current HUD definition of homelessness is limited to people who are on the streets or who are staying in shelters. It excludes people who are forced to live in other homeless situations, including people staying with others temporarily because they have nowhere else to go (“doubled-up”), and people staying in motels due to lack of adequate alternatives.
- Families, children, and youth on their own are disproportionately excluded by the current HUD definition. The streets are untenable for families who lose their housing because living on the streets puts children at unthinkable risk – it means child welfare involvement and the separation of the family. Instead, many homeless families have no choice but to stay temporarily with other people, or in motels, often in overcrowded and unwelcoming circumstances. Youth on their own also are more likely to “couch surf” due to lack of other options. In addition, in many places across the country, there are no family or youth shelters, or those shelters are full, thus forcing families and youth into other homeless situations. For example, domestic violence shelters nationwide turn away nearly as many women as they serve.
- The current HUD definition of homelessness does not match the reality of who is homeless in communities nationwide. While this incongruity is especially true for smaller towns and rural areas, it is also true in urban areas, where many families and unaccompanied youth are excluded from services. Communities need the flexibility to address homelessness as it exists in their area; the HUD definition currently deprives communities of that flexibility and prevents them from meeting the needs that *they* are identifying.

**Are People Living in Doubled-Up Situations and Motels “Truly” Homeless?**

- Yes. People who have lost their housing and live in doubled-up situations and in motels have nowhere else to go and often change temporary locations on a daily or weekly basis. Shelters may be unavailable, or if available, may provide the untenable option of not

being able to accommodate all family members as a unit. People in motels are forced to exhaust their limited financial resources on inadequate and temporary living situations, which prevents them from saving for permanent housing. People in doubled-up situations are dependent on those families or individuals who take them into their homes. They can be forced to leave at any time; the issues of dependency and need are no different than those of shelter residents. Host families essentially serve as temporary shelters.

- Doubled-up and motel situations are precarious and damaging. They are crowded and unstable, leading to extraordinary rates of mobility. Often, these living situations are also unsafe, and, in the case of doubling up, create child welfare concerns as children may stay with many strangers. There are no services for families and youth staying in these makeshift arrangements— no provided meals, no supports. Youth who are on their own face particular risks to their health and safety when they share the housing of others because they have nowhere else to stay. Furthermore, because domestic violence shelters are frequently full, victims of domestic violence and their children often have no other option but to live doubled-up, exposing them to greater risks of returning to an abusive situation or being found by an abuser.
- People living in motels and doubled-up situations experience significant barriers to accessing comprehensive supportive services in their communities. For example, they may not know whom to contact or where to seek assistance for their most basic needs. They are essentially “on their own,” with no case management assistance for accessing suitable housing.

### **Doesn't the Current HUD Definition of Homelessness Target The Most Vulnerable, "Neediest" Homeless People?**

- The current HUD definition only targets some of the most vulnerable because it excludes so many children and youth. Children are equally vulnerable to the ill effects of homelessness – homelessness compromises the very foundations of child development. For example, infants and toddlers who are homeless are at extreme risk of developmental delays and health complications. Brain development, language acquisition, and motor skills can suffer serious harm from the instability experienced during homelessness. A recent working paper from the National Scientific Council on the Developing Child states, “Science does not support the claim that infants and young children are too young to be affected by significant stresses that negatively affect their family and care-giving environments.”
- Many of the appalling conditions of homelessness directly contribute to physical, mental, and emotional harm for school-age children and older youth. School-age children experiencing homelessness are diagnosed with learning disabilities and chronic and acute health conditions at much higher rates than other children. Youth on their own face similar challenges and also are at high risk of victimization. According to the federally funded National Runaway Switchboard, 5,000 unaccompanied youth die each year from assault, illness, or suicide. In addition, there is evidence that experiencing homelessness

as a child or youth is associated with experiencing deep poverty and homelessness as an adult.

- In sum, a homeless adult is not more vulnerable than a homeless child or youth. These populations are vulnerable in different ways. It is both unethical and ineffective to position them against each other for housing and service dollars; today's homeless children and youth are at high risk of becoming tomorrow's homeless adults. If federal agencies do not adopt policies that are responsive to the needs of children and youth, homelessness – including “chronic” homelessness – will be perpetuated indefinitely.

### **Would People Sharing Housing Because of “Cultural Preferences,” “Voluntary Arrangements,” and “Traditional Support Networks” Be Considered Homeless Under an Expanded HUD Definition?**

- No. A recent U.S. Interagency Council on Homelessness newsletter raised concerns about the appropriateness of considering individuals or families homeless when they are “doubled up” and sharing housing due to “cultural preferences,” “voluntary arrangements,” and “traditional networks of support.” However, individuals and families in those living situations would not be considered homeless under the proposed change to HUD's definition of homelessness. The only “doubled up” people who would be newly defined as homeless for HUD homeless assistance programs are those who face those circumstances due to “loss of housing, economic hardship, or similar reasons.” Service providers would be able to make eligibility determinations on a case-by-case basis - just as they must currently do when attempting to determine whether a homeless individual meets the federal definition of “chronic” homelessness.
- The U.S. Interagency Council on Homelessness newsletter on this issue also suggested that an expanded definition of homelessness would be overly inclusive of minority families, under the assumption that those families are more likely to be homeless due to due to “cultural preferences,” “voluntary arrangements,” and participation in “traditional networks of support.” However, as discussed above, only families who are doubled up “due to loss of housing or economic hardship” would be newly defined as homeless. These criteria are race and ethnicity neutral - if many minority families would be captured by an expanded definition of homelessness, that is because many of those families are poor, and do not have their own housing. These families are properly deserving of homeless assistance through HUD McKinney-Vento programs.

### **How Do Other Federal Definitions of Homelessness Compare to the HUD Definition?**

- The definition of homelessness contained in the education subtitle of the McKinney-Vento Act includes children and youth in motels and those who share the housing of others due to loss of housing, economic hardship, or similar reasons. Prior to the inclusion of this definition in the McKinney-Vento education subtitle in 2002, similar language was contained in policy guidance issued by the U.S. Department of Education in 1995. Thus, school districts nationwide have been using this definition of homelessness successfully for more than a decade.

- The Violence Against Women Act, signed into law in January 2006, now incorporates the education definition of homelessness and therefore is more sensitive to the needs and realities of women and children fleeing domestic violence.
- Homeless assistance programs administered by the U.S. Department of Health and Human Services (Head Start, Health Care for the Homeless, the Treatment for Homeless Program) have adopted regulations that define homelessness more broadly than the HUD definition.
- Similarly, the Department of Labor’s Homeless Veterans Reintegration Program (HVRP) uses a broader definition of homelessness than the HUD definition. The HVRP definition reflects the reality that many single veterans and veterans with families bounce around between unstable living situations, unable to secure and retain the stable employment necessary to ensure that they can meet fixed monthly housing costs. Wisely, as HUD should also do in the case of individuals and families doubled up due to lost housing or economic hardship, the Department of Labor has recognized that it is better to assist these veterans before they find themselves on the streets or in emergency shelters.

**Won’t a Broader HUD Definition Put Greater Pressure on a Limited Source of Funding and “Dilute” the Effectiveness of the Homeless Assistance Program?**

- No. Broadening the HUD definition of homelessness will give communities the local flexibility to serve people who are homeless in their area who they cannot serve under the current definition. The fact that so many national, state, and local organizations support the broadened HUD definition is tangible evidence that providers would find this flexibility a welcome and needed change – not a burden. The end result would be a more effective homeless assistance program based on a realistic count of homeless people in a particular community.
- The current HUD Homeless Assistance Programs are not, in fact, “effective” for the many homeless populations who cannot participate in them because they are currently ineligible. A broadened definition would increase the program effectiveness for these populations, such as children and youth.
- Broadening the HUD definition of homelessness will bring more organizations serving children, youth, and families into Continuums of Care. This will bring additional local resources to bear in the effort to end homelessness. It will also create new stakeholders who will advocate for additional federal resources targeted towards preventing and ending homelessness.
- Funding levels are in no way a reflection of the magnitude of the problem. Homelessness exists, whether or not the federal government commits adequate funds to address it. Other federal agencies do not have limitless funding, but have sought to design program eligibilities that best meet the needs of all people who are homeless. HUD should do the same.

## **Wouldn't It Be Difficult for HUD-funded Agencies to Determine Homeless Status Under This Broader Definition?**

All federally funded agencies make determinations of eligibility on a case-by-case basis; this would be the same under a broader HUD definition. Public schools and other agencies have been determining eligibility based on doubled-up and motel situations for more than a decade. Based on his or her experiences, determining eligibility of doubled-up status poses no greater challenge than determining if someone meets the current definition of “chronic homelessness,” (i.e., “an unaccompanied homeless individual with a disabling condition who has either been continuously homeless for a year or more, or has had at least four episodes of homelessness in the past three years”). In both cases, eligibility can be verified through a combination of any available supporting documentation and statements made by third parties.

### **List of National, State, and Local Endorsers as of May 23, 2006**

#### National Organizations

Child Welfare League of America  
Family Promise  
National Association for the Education of Homeless Children and Youth  
National Center on Family Homelessness  
National Coalition Against Domestic Violence  
National Coalition for Homeless Veterans  
National Coalition for the Homeless  
National Health Care for the Homeless Council  
National Law Center on Homelessness & Poverty  
National Low Income Housing Coalition  
National Network for Youth  
National Network to End Domestic Violence  
National Policy and Advocacy Council on Homelessness  
Stand Up For Kids, Inc.  
Volunteers of America

#### Statewide/Regional Organizations

Alaska Coalition on Housing and Homelessness  
Arkansas Hunger Coalition  
California Coalition for Rural Housing  
Central Texas Homeless Alliance  
Florida Coalition for the Homeless  
Illinois Coalition to End Homelessness  
Indiana Coalition on Housing and Homeless Issues  
Iowa Coalition for Housing and the Homeless  
Michigan Coalition Against Homelessness

Minnesota Coalition for the Homeless  
New Mexico Coalition to End Homelessness  
New York State Rural Housing Coalition  
Northeast Louisiana Delta Community Development Corporation  
Northern Kentucky Housing and Homeless Coalition  
Southeast Minnesota Continuum of Care  
Texas Homeless Network  
Upstate Homeless Coalition of South Carolina  
Washington Low Income Housing Institute  
Western Regional Advocacy Project  
Youth Empowerment Program of Ohio

#### Local Organizations

Albuquerque Health Care for the Homeless  
Cabell-Huntington Coalition for the Homeless, (WV)  
Camillus Health Concern, Inc., Miami, FL  
Caracole, Inc., Cincinnati, OH  
Catholic Charities of New Orleans  
Chicago (IL) Coalition for the Homeless  
Committee for Housing Stability, Dalton, GA  
Community Enrichment Center, Fort Worth, TX  
Continuum of Care for Cabell and Wayne Counties and Huntington, WV  
Corbin's United Effort, Corbin, KY  
Dubuque Continuum of Care, Dubuque, IA  
The Empowerment Program, Denver, CO  
Greater Wheeling Coalition for the Homeless, Inc. (WV)  
Hazard Perry County Community Ministries, Inc. (KY)  
Homeless Action Group, Atlanta, GA  
Homeless Coalition of Hillsborough County, Inc. (FL)  
Homeless Health Care Center, Chattanooga, TN  
Homes for Life Foundation, Los Angeles, CA  
Housing Partnership for the New River Valley, VA  
Interfaith Council for Homeless Families, Morris County, NJ  
Johnson County Local Homeless Coordinating Board, IA  
LA Coalition to End Hunger & Homelessness, Los Angeles, CA  
McCreary County Community Housing Development Corporation, KY  
Neighborhood Development Foundation, New Orleans, LA  
Neighborhood Housing Services, New Orleans, LA  
New Orleans Neighborhood Development Collaborative  
Norfolk Homeless Consortium, Norfolk, VA  
Phoenix Health Center, Louisville, KY  
Restoration Enterprises, Redding, CA  
St. Paul / Ramsey County Homeless Advisory Board, MN  
Virginia Beach Homeless Advocacy Resource Partnership, VA  
Women In Need, Inc., New York, NY