

Honorable Mr. McCrory, Honorable Mr. Sanchez, Co-Chairs, and members of the Education Committee,

I am submitting this testimony regarding **H.B. No. 5222 ( Raised) An Act Expanding Eligibility in the Care4Kids Program for Homeless Families**. I applaud the action of this Committee and the Office of Early Childhood to provide accommodations for children experiencing homelessness and their families to access federally subsidized and quality child care through the Care4Kids subsidy program. This is in line with expectations under the federal Child Care and Development Fund Program Rules.

Young children experiencing homelessness are at higher risk developmentally and educationally, and quality child care and early education programs help to mitigate the long term effects of extreme poverty, mobility and precarious living arrangements. School-aged children experiencing homelessness benefit, too, from access to subsidized before- and after-school programs. For children of all ages who are experiencing homelessness, participation in these programs creates the stability often missing in their lives. Care4Kids can provides such stability. Additionally, many states consider their use of federal child care subsidies through the Child Care and Development Block Grant as a key component of their comprehensive statewide efforts aimed at increasing children's long term educational success.

Due to a variety of economic challenges, including the lack of affordable housing, working families also benefit from access to subsidized child care. For many parents, access to safe, stable and affordable child care is requisite to entering, re-entering or remaining in the workforce. Connecticut, in particular, is a state that uses child care subsidy dollars as a key component of statewide efforts aimed supporting working families (rather than as key to increasing at-risk children's long term success.) Unfortunately, even employment does not ensure sufficient income to afford housing, and assistance with child care costs is essential. Prioritizing working families experiencing homelessness is a step toward supporting all children and families who are experiencing homelessness regardless of work/school status, so this step is good yet still leaves many children and families behind.

Amid the wide range of funding demands in our state, thank you for recognizing the plight of a subgroup of homeless families. It is a start.

Important as this is, I do want to call to your attention to a discrepancy in the definition of homeless being used in H.B. No. 5222. This bill defines homeless using the HUD definition: ***"...as defined in 24 CFR Parts 91, 582"***. However, the federal child care regulations governing CCDF, which supports Care4Kids, is based on the McKinney-Vento Act's Education Subtitle definition of homeless: ***"...as defined in section 725 of Subtitle VII-B of the McKinney-Vento Act (42 U.S.C. 11434a)"***.

It seems there has been some confusion in the development of H.B. No. 5222. The bill describes the use of federal funds regulated by HHS's Office of Child Care but it uses a definition for funds regulated by HUD. Such confusion is not unusual since, nationally, the multiple definitions used for different funding streams creates misunderstandings for legislators,

providers and even for families trying to understand which services they may be eligible for. These differences among definitions create confusion as well as serious barriers to access.

I have included several citations below that will be helpful in clarifying the different definitions. This same confusion arose last year in a statewide meeting of housing and Head Start representatives in Connecticut in which the conveners focused on the HUD definition, although Head Start is obliged to use broader definition in determining eligibility for its services. While it would be helpful to design an early education and child care system around the needs of families who meet the HUD definition, especially to boost success in its efforts to divert and rapidly rehouse families away from the shelter system, the federal intent of creating access to child care subsidies includes attention to the best interest of vulnerable children. Preventing access to early education and child care to children living doubled-up due to economic circumstances or in other temporary or precarious living arrangements is out of alignment with the requirements of the US Departments of Education and Health and Human Services and their clear intent to identify and support children in all homeless situations, as defined more broadly, so that they have access to the developmental and educational opportunities *and stability* they require to be successful learners.

There is much more to say, but the important point of this testimony is to draw attention to the discrepancy in federal and state definitions this Bill language would codify. Should there be the opportunity in the future to align prioritized eligibility to the needs of children then there may be additional testimony that I could offer.

Thank you for your time,  
Grace Whitney, PhD, MPA, IMHE®  
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#### RESOURCES:

##### **Federal Child Care Regulations and Homelessness**

<https://www.schoolhouseconnection.org/wp-content/uploads/2016/12/CCDFSummary.pdf>

Definition of Homelessness The McKinney-Vento definition of homelessness used by all public schools in the United States includes children and youth who lack a fixed, regular, and adequate nighttime residence. This definition includes children and youth living in shelters, transitional housing, cars, campgrounds, motels, and sharing the housing of others temporarily due to loss of housing, economic hardship, or similar reasons. It is the same definition of homelessness used by Head Start, child nutrition, and other federal family and youth programs. Per the CCDF regulation below, States that receive CCDF funds via the state's Lead Agency, and all child care providers/programs funded by CCDF, also must use the McKinney-Vento Act's education subtitle's definition, bringing child care into alignment with other federal early childhood and education programs. §98.2 DEFINITIONS. Child experiencing homelessness means a child who is homeless as defined in section 725 of Subtitle VII-B of the McKinney-Vento Act (42 U.S.C. 11434a).

## **HB 5222 AN ACT EXPANDING ELIGIBILITY IN THE CARE4KIDS PROGRAM FOR HOMELESS FAMILIES.**

<https://cga.ct.gov/2020/TOB/h/pdf/2020HB-05222-R00-HB.PDF>

“...the criteria described in category 1 or category 4 of the definition of homeless, as defined in 24 CFR Parts 91, 582 and 583 by the United States Department of Housing and Urban Development”

### **Definition of Homelessness**

Preschool, Head Start, and Child Care Policies for Children Experiencing Homelessness Updated: October 4, 2016

<https://naehcy.org/wp-content/uploads/2018/04/ECEcrosswalkFINAL1042016-v2018.pdf>

### Public Schools including Preschool: Subtitle VII-B of the McKinney-Vento Act

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

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.”<sup>7</sup> 42 USC §11434a(2).

### Child Care and Development Block Grant

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.

Identical definition. §98.2.

### The Head Start Act and the Head Start Program Performance Standards

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

Identical definition. §1305.2.