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HOMELESSNESS

To Improve Data and
Programs, Agencies Have
Taken Steps to Develop a
Common Vocabulary

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Highlights of [GAO-12-302T](#), a testimony before the Subcommittee on Insurance, Housing, and Community Opportunity, Committee on Financial Services, House of Representatives

Why GAO Did This Study

According to the Department of Housing and Urban Development's (HUD) estimates of shelter use, the number of homeless families increased by 20 percent from 2007 to 2010 and families currently represent a much larger percentage of the shelter population than ever before. Multiple federal agencies administer programs designed to address the needs of children and youths experiencing homelessness, but some programs use different definitions of homelessness to determine eligibility. The definitions range from people living in emergency or transitional shelters or on the street to those living with others because of economic hardship or living in motels or campgrounds because they lack other adequate alternative accommodations.

This testimony discusses differences in the federal definitions of "homelessness" and other factors that may influence the effectiveness of programs serving persons experiencing homelessness, including children and youth. In completing this statement, GAO reviewed and updated, as appropriate, its June 2010 report, *Homelessness: A Common Vocabulary Could Help Agencies Collaborate and Collect More Consistent Data* ([GAO-10-702](#)). In that report, GAO recommended that federal agencies develop a common vocabulary for homelessness and determine whether it would be cost-effective to use this common vocabulary to develop and implement guidance for collecting consistent federal data on housing status. The agencies agreed with our recommendations. This statement also discusses the progress federal agencies have made in implementing these recommendations.

View [GAO-12-302T](#). For more information, contact Alicia Puente-Cackley at (202) 512-8678 or cackelya@gao.gov.

December 15, 2011

HOMELESSNESS

To Improve Data and Programs, Agencies Have Taken Steps to Develop a Common Vocabulary

What GAO Found

Definitional differences of homelessness have posed challenges to providing services for children and youth. Children and youth living in precarious situations, such as living with others or in hotels, historically were excluded from receiving government-funded services. Congress enacted the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act), which broadened the general definition of homelessness and provided greater statutory specificity concerning those who should be considered homeless. In November 2011, HUD issued a final rule on the definition of homelessness, adding a new category of homelessness—unaccompanied youth, and families with children and youth who are defined as homeless under other federal statutes. The HEARTH Act and HUD's recent definition changes may alleviate some challenges previously faced by children and youth in accessing services, but not enough time has passed to assess the impact of those changes. Some children and youth who previously were not considered homeless by HUD will now qualify as homeless. However, the broadening of the definition does not mean that everyone who meets the new definition would be entitled to benefits in all homeless assistance programs, and constraints on resources will likely continue to restrict access for some children and youths.

As of December 2011, the U.S. Interagency Council on Homelessness (Interagency Council) and federal agencies had taken steps to develop a common vocabulary for discussing homelessness and related terms, as GAO recommended in its June 2010 report. In January 2011, the Interagency Council convened a meeting of experts to discuss the development of a common vocabulary and the extent to which differences in definitions create barriers to accessing services. The Interagency Council issued a report to Congress in June 2011 that summarized the feedback received during the meeting. The report notes that a common vocabulary would allow federal agencies to better measure the scope and dimensions of homelessness, and may ease program implementation and coordination. As of December 2011, Interagency Council staff told GAO that they held three meetings—in August, September, and October 2011—to discuss implementation of a common vocabulary and data standard with key federal agencies such as HUD; the Departments of Commerce, Education, Health and Human Services (HHS), Labor, and Veterans Affairs (VA); and the Social Security Administration. The Interagency Council also noted that individual federal agencies have taken some positive steps to create this common data standard and improve coordination across agencies. For example, HHS and VA have been working with HUD to plan the potential transition of some of their programs to HUD's data system (Homelessness Management Information Systems). As GAO has reported in the past, a common vocabulary would allow agencies to collect consistent data that agencies could compile to better understand the nature of homelessness, and it would allow agencies to communicate and collaborate more effectively.

Chairman Biggert, Ranking Member Gutierrez, and Members of the Subcommittee:

I am pleased to be here to participate in today's hearing on the barriers that homeless children and youths face in securing services. The Census Bureau indicates that 22 percent of all children in the United States (16.4 million), lived in poverty in 2010, and some evidence suggests that homelessness among children is increasing. For example, according to the Department of Housing and Urban Development's (HUD) estimates of shelter use, the number of homeless families increased by 20 percent from 2007 to 2010 and families currently represent a much larger percentage of the shelter population than ever before.¹ Furthermore, the Department of Education (Education) identified 939,903 homeless students during the 2009-2010 school year, an 18 percent increase since the 2007-2008 school year. Multiple federal agencies administer programs designed to address the needs of children and youths experiencing homelessness, but some programs use different definitions of homelessness to determine eligibility. The definitions range from people living in emergency or transitional shelters or on the street, to those living with others because of economic hardship or living in motels or campgrounds because they lack other adequate alternative accommodations. Counts of homeless children vary by agency, partly because various federal programs have used different definitions. For example, Education's counts of homeless children have differed from HUD's counts, partly because Education's counts also include children doubled up in private residences or living in hotels or motels while HUD's have not.

My statement today is based on our June 2010 report on differences in the federal definitions of "homelessness" and other factors that may influence the effectiveness of programs serving persons experiencing homelessness, including children and youths.² To improve federal agencies' understanding of homelessness and help mitigate the barriers

¹The technical term is "homeless persons in families" and includes households with at least one adult and one child. This data point is according to HUD's 1-year estimates of shelter use. According to HUD's 2010 estimate, about 59 percent of the members of these homeless families—335,000—were children under age 18. Data limitations about homeless children and youths are discussed later in this statement.

²See GAO, *Homelessness: A Common Vocabulary Could Help Agencies Collaborate and Collect More Consistent Data*, [GAO-10-702](#) (Washington, D.C.: June 30, 2010).

posed by having different definitions of homelessness, we made two recommendations in that report to federal agencies—working through the U.S. Interagency Council on Homelessness (Interagency Council). We recommended that they

- Develop joint federal guidance that establishes a common vocabulary for discussing homelessness and related terms. Such guidance may allow agencies to collaborate more effectively to provide services to those experiencing homelessness.
- Determine whether it would be cost-effective to use this common vocabulary to develop and implement guidance for collecting consistent federal data on housing status for programs that address homelessness.

Specifically, this statement focuses on how differences in the definition of homelessness may influence the effectiveness of programs, as well as the progress federal agencies have made in implementing our recommendations.

For our 2010 report, we reviewed relevant laws, regulations, and government reports across a number of programs specifically targeted to address issues related to homelessness. We also interviewed officials at HUD; the Departments of Health and Human Services (HHS) and Education; the Interagency Council; and the Departments of Justice and Labor. We conducted in-depth interviews with a variety of stakeholders, including advocates and researchers, as well as service providers, state and local government officials, and HUD field staff that had extensive experience with homeless programs. We conducted four site visits to large and medium-sized urban areas that were geographically distributed across the United States. To update information for this testimony, we interviewed officials from the Interagency Council and reviewed relevant documents related to actions taken to implement our recommendations.

This statement summarizes our June 2010 report that was based on work conducted between May 2009 and June 2010. We updated our work in November and December 2011. Both of these performance audits were conducted in accordance with generally accepted government auditing standards. These standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

Definitions of Homelessness

Congress first provided a general definition of homeless individuals in 1987 in what is now called the McKinney-Vento Act.³ In 2002, Congress added a definition for homeless children and youths to be used in educational programs.⁴ In 2009, Congress enacted the Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH Act).⁵ The HEARTH Act broadened the general definition of homelessness and provided greater statutory specificity concerning those who should be considered homeless. In November 2011, HUD issued a final rule to implement changes to the definition of homeless in the HEARTH Act.⁶ The rule expands who is eligible for various HUD-funded homeless assistance programs. The broadened definition adds a new category of homelessness, which includes unaccompanied youth and families with children and youth who are defined as homeless under other federal statutes—such as the Runaway and Homeless Youth Act and the Head Start Act.⁷ As a result, persons meeting other federal statutes' broader definitions of homelessness also can be eligible for HUD programs.

Data on Homeless Children and Youths

The data on those experiencing homelessness have a number of shortcomings and consequently do not fully capture the extent and nature of homelessness. According to the Interagency Council's 2010 federal strategic plan, the actual number of youths experiencing homelessness is unknown. As we reported in 2010, these data shortcomings derive from the difficulty of counting a transient population that changes over time and lack of comprehensive data collection requirements. For example, HUD, HHS, and Education each collect data for its own purposes, resulting in

³The act was originally named the Stewart B. McKinney Act but was changed to the McKinney-Vento Act in 1989.

⁴Before the inclusion of this definition in the McKinney-Vento education subtitle in 2002, similar language was contained in policy guidance issued by Education in 1995.

⁵Pub. L. No. 111-22 § 1001, et seq. (May 20, 2009).

⁶The rule was published in the *Federal Register* on December 5, 2011 (76 Fed. Reg. 75994) and will be effective January 4, 2012.

⁷42 U.S.C. 5701 et seq. and 42 U.S.C. 9831 et seq.

differences in what data are collected and how they are aggregated. Often agencies solely count those receiving federally funded services, and because unaccompanied youth are often not connected to services or shelters, they are difficult to count. Furthermore, Education may not fully capture the extent of homelessness among school-aged children because, as we reported in 2010, districts we visited used a system of referrals and self-reporting to identify these children. As we reported in 2010, many school officials and advocates said the term “homeless” carried a stigma that made people reluctant to self-report.

The Interagency Council

The McKinney-Vento Act authorized the creation of the Interagency Council as an independent establishment whose membership is statutorily defined.⁸ The HEARTH Act directed the Interagency Council to coordinate the federal response to homelessness and create a national partnership at every level of government and with the private sector to reduce and end homelessness.⁹ The Interagency Council is also required to develop and annually update a federal strategic plan to end homelessness, as well as perform several other duties such as collecting and disseminating information relating to homeless individuals, developing joint federal agency initiatives to fulfill its goals, and providing professional and technical assistance to states, local governments, and other public and private nonprofit organizations. In fiscal year 2011, Congress appropriated \$2.68 million for the Interagency Council to carry out its responsibilities. We are presently reviewing potential fragmentation, overlap, and duplication in federal homelessness programs, including agencies’ and the Interagency Council’s role in coordinating programs, and will issue a report in spring 2012.

⁸The Interagency Council was established by title II of the McKinney-Vento Act, Pub. L. No. 100-77 § 20, as the “Interagency Council on the Homeless.” In 2004, Congress renamed it “United States Interagency Council on Homelessness.” Pub. L. No. 108-199 § 201 (Jan. 23, 2004). The Interagency Council includes members from the following: the Departments of Agriculture, Commerce, Defense, Education, Energy, Health and Human Services, Homeland Security, Housing and Urban Development, Interior, Justice, Labor, Transportation, and Veterans Affairs; Corporation for National and Community Service; General Services Administration; Office of Management and Budget; Social Security Administration; U.S. Postal Service; and the White House Office of Faith-Based and Community Initiatives (now known as the White House Office of Faith-Based and Neighborhood Partnerships).

⁹See Pub. L. No. 111-22 § 1004.

Definitional Differences Have Limited Providers' Ability to Serve Children and Youths

Definitional differences of homelessness have posed challenges to providing services for children and youths. As we reported in 2010, many advocates, government officials, service providers, and researchers we interviewed identified differences in definitions of homelessness as an important barrier to providing services, and several noted that families and youths living in precarious situations historically were not eligible for federal assistance under a narrow definition of homelessness. Some said that families and youths who were doubled up or living in hotels because of economic hardship often had similar or greater needs for services than those who met narrower definitions, but were excluded from receiving government-funded services. Those that cited differences in definitions as a barrier also said that families and youths with severe housing needs had to be on the street or in shelters to access some federally funded homeless assistance but shelters were not always available or appropriate for them. For instance, a researcher and a service provider suggested that adult shelters were not appropriate for unaccompanied youths or young adults, and few shelters were designed specifically for them. Furthermore, some family facilities do not provide shelter for males above a certain age, so families with male teenage children might not be able to find shelter together.

As we reported in 2010, many of those involved in homeless programs with whom we spoke were particularly concerned about the exclusion of families and youths from programs that addressed the needs of chronically homeless individuals.¹⁰ Before the passage of the HEARTH Act, families who otherwise met the criteria for chronic homelessness programs were not able to participate because chronic homelessness was defined to include only unaccompanied individuals. Our interviewees noted that the emphasis on funding programs for chronic homelessness meant that families have been underserved. A youth service provider further noted that youths effectively were excluded from programs for

¹⁰Before enactment of the HEARTH Act, there was no statutory definition of chronic homelessness. In a 2003 *Federal Register* release announcing a joint agency initiative to end chronic homelessness, HUD, HHS, and the Department of Veterans Affairs defined the term to mean "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." Notice of Funding Availability for the Collaborative Initiative to Help End Chronic Homelessness, 68 *Fed. Reg.* 4018, 4019 (Jan. 27, 2003). In an amendment to title IV of the McKinney-Vento Act (which authorizes the emergency shelter and transitional housing programs administered by HUD), the HEARTH Act added a definition of "chronically homeless" that includes individuals or families who qualify under the definition. Pub. L. No. 111-22 § 1101, 123 Stat. 1669.

those experiencing chronic homelessness because youths generally did not live in shelters or keep records of where they had been living or for how long.

While the HEARTH Act and HUD's recent definition changes may alleviate some challenges, not enough time has passed to assess the impact of the changes. The broadening of the definition of homeless does not mean that everyone who meets the new definition would be eligible for or entitled to benefits in all homeless assistance programs. For some programs, the definition of homeless determines whether individuals are eligible for program benefits and meeting the definition entitles the individual to certain benefits. For example, the Education of Homeless Children and Youth program entitles students to certain benefits as long as they meet the definition. However, for other programs, such as HUD's homeless assistance grants or HHS's Runaway and Homeless Youth programs, benefits are limited by the amount of funds appropriated for the program. For these programs, meeting the definition of homeless does not necessarily entitle individuals or families with children to benefits. Additionally, these programs have other eligibility criteria such as income levels, ages, or disability status to help determine and prioritize who receives the benefits.

Although more children and youth may be eligible for HUD programs under HUD's new definition, barriers to serving them may persist. For example, according to our 2010 report, HHS officials told us that in the 2009 program year, less than half of families in Head Start who experienced homelessness acquired housing. HHS attributed this to a lack of affordable housing and long waiting lists for housing assistance, not necessarily definitional differences. Also, officials at HHS acknowledged that Head Start programs across the country sometimes were not using the appropriate definition of homelessness to identify children who qualified for services. As a result, some homeless families did not receive Head Start services.

We also reported in 2010 that some interviewees stated that definitional differences of homelessness made collaboration more difficult. Because homelessness is a multifaceted issue and a variety of programs across a number of departments and agencies have been designed to address it, collaborative activities are essential to reducing homelessness in a cost-effective manner. According to some interviewees, different definitions of homelessness and different terminology to address homelessness have made it difficult for communities to plan strategically for housing needs

and for federal agencies to collaborate effectively to provide comprehensive services.

Federal Agencies Have Taken Steps to Develop a Common Vocabulary

As of December 2011, the Interagency Council and federal agencies have taken steps to develop a common vocabulary for discussing homelessness and related terms, as we recommended in our June 2010 report. The HEARTH Act mandated that after the completion of our June 2010 study, the Interagency Council convene a meeting of experts to discuss the need for a uniform federal definition of homelessness and the extent to which differences in definitions create barriers to accessing services. In January 2011, the Interagency Council held a meeting with 85 participants from a variety of stakeholder organizations and issued a report to Congress in June 2011 that summarized the feedback received during the meeting.¹¹ According to the June 2011 report, developing a common vocabulary would entail developing shared terminology for talking about the many different types of homelessness, such as living on the streets, in shelters, or doubled up with family or friends. However, each federal agency still would maintain its own program eligibility criteria as defined by statute, regulation, or administrative rules. The June 2011 report notes that a common vocabulary would allow federal agencies to better measure the scope and dimensions of homelessness, and may ease program implementation and coordination.

During the January 2011 meeting, participants also identified next steps for building a common vocabulary and data standard on housing status, which, according to the Interagency Council, would allow measurement of homelessness across agencies or at the federal level. As part of the next steps for building a common vocabulary, the Interagency Council developed an interagency workgroup that will conduct an inventory of current data standards across agencies to build on common reporting requirements. Additionally, the workgroup will focus on classifying existing reporting requirements into a common vocabulary that describes the varying conditions of homelessness that different federal agencies target. As of December 2011, Interagency Council staff told us that they held three meetings—in August, September, and October 2011—to discuss implementation of a common vocabulary and data standard with key

¹¹U.S. Interagency Council on Homelessness, *Report to Congress: Community Forum to Discuss GAO Recommendation to Develop a Common Federal Vocabulary on Housing Status*, June 2011.

federal agencies such as Education, HUD, HHS; the Departments of Commerce, Defense, Labor, and Veterans Affairs (VA); the Social Security and General Services Administrations; and the Office of Management and Budget.

The Interagency Council also noted that individual federal agencies have taken some positive steps to create this common data standard and improve coordination across agencies. In an update to its strategic plan in October 2011, the Interagency Council noted that agencies such as HHS and VA have been working with HUD to better coordinate data collection, analysis, and reporting.¹² For example, HHS, HUD, VA, and the Interagency Council issued joint guidance and hosted a webinar on strategies to improve the accuracy of HUD's point-in-time counts of people experiencing homelessness, particularly for youth and veterans. Additionally, HHS and VA have each been working with HUD to plan the potential transition of some of their programs to HUD's data system (Homelessness Management Information Systems, or HMIS). The Interagency Council has a goal of transitioning two other federal agencies to HMIS by December 31, 2014.

In conclusion, changes to the definition of homeless based on the HEARTH Act and HUD's final rule may alleviate some of the challenges the narrower definitions previously presented. Also, federal agencies' efforts to develop a common vocabulary and data standard will likely allow agencies to measure homelessness more consistently. However, a broader and more consistent definition of homeless does not mean that everyone who meets the new definition would be entitled to benefits in all homeless assistance programs, and constraints on resources will likely continue to restrict access for some children and youth.

Chairman Biggert, Ranking Member Gutierrez, and Members of the Subcommittee, this concludes my prepared statement. I would be pleased to respond to any questions that you may have at this time.

¹²The Interagency Council issued its first strategic plan in June 2010, which included an objective to strengthen capacity and knowledge, including creating a common data standard and uniform performance measures if feasible. See U.S. Interagency Council on Homelessness, *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*, June 2010. For the 2011 update, see *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness Update 2011*, October 2011.

GAO Contacts and Acknowledgments

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