



July 8, 2019

Submitted via [www.regulations.gov](http://www.regulations.gov)

Office of General Counsel, Rules Docket Clerk  
Department of Housing and Urban Development  
451 7th Street SW, Room 10276  
Washington, DC 20410-0500

Re: HUD Docket No. FR-6124-P-01, RIN 2501-AD89 Comments in Response to Proposed Rulemaking: Housing and Community Development Act of 1980: Verification of Eligible Status

Dear Madam/Sir:

We are writing in response to the Department of Housing and Urban Development's (HUD) proposed rule to express our strong opposition to the changes regarding "verification of eligible status," published in the Federal Register on May 10, 2019 (RIN 2501-AD89; HUD Docket No. FR-6124-P-01) ("Proposed Rule"). Implementation of this proposed rule will serve to displace thousands of mixed-status families currently being assisted under HUD's subsidized housing programs and will have the negative effect of depriving otherwise eligible persons, including those belonging to vulnerable populations, from accessing these vital housing benefits. We urge that the proposed rule to be withdrawn in its entirety and that HUD instead retain its long-standing regulations with respect to mixed-status families.

Bay Area Legal Aid provides critical legal services to marginalized communities in the areas of housing, public benefits, health access, youth justice, and domestic violence prevention. Among its core priorities, Bay Area Legal Aid provides free wrap-around legal services to low income survivors of interpersonal violence (which includes domestic violence, sexual assault, human trafficking, and child abuse) in seven of the nine Bay Area Counties. Each year, we serve roughly 10,000 low income individuals residing in the San Francisco Bay Area. Within our dynamic practice, we strive to ensure that our clients obtain equal access to justice regardless of their income, race, ethnic background, gender identity, sexual orientation, or disability. A significant number of our clients are either immigrant tenants or U.S. citizens who form part of mixed-status households. Many of our clients are also immigrants and survivors of interpersonal violence. We are accordingly concerned about the manner in which these clients' rights will be adversely affected by HUD's proposed changes to these longstanding regulations.

## **I. The Proposed Rule is Inconsistent with the Plain Language of Section 214**

HUD maintains that its proposed rule will ensure “conformity of regulations with statutory mandates,” and further asserts that implementation of these changes “will bring HUD’s regulations into greater alignment” with the requirements of Section 214 of the Housing and Community Development Act. However, the very statute that purportedly informs HUD’s proposed rule does not support the agency’s position. The underlying statute does not require that non-qualifying family members who elect not to assert eligibility declare status or undergo a status check. Nor does Section 214 require PHAs to screen family members who do not elect to declare eligible status. In fact, Section 214 clearly permits housing authorities to choose not to affirmatively establish ineligibility.<sup>1</sup> Section 214 explicitly states that:

If the eligibility for financial assistance of at least one member of a family has been affirmatively established under the program of financial assistance and under this section, and the ineligibility of one or more family members has not been affirmatively established under this section, any financial assistance made available to that family by the applicable Secretary *shall be prorated, based on the number of individuals in the family for whom eligibility has been affirmatively established under the program of financial assistance and under this section, as compared with the total number of individuals who are members of the family.*<sup>2</sup>  
(emphasis added)

Existing law thus clearly contemplates that HUD must retain ongoing proration of housing subsidy assistance as the standard practice for households that include at least one program eligible family member and one or more other members who have opted not to declare eligible status.

HUD touts amendments to the Housing and Community Development Act introduced in 1988 as justification for its current proposal. Said amendments, however, did not nullify the above standard practice with respect to mixed-status families. If anything, Section 214’s legislative history shows that HUD’s proposed rule is predicated on a misapplication of these amendments. Section 214 was passed in 1980. As the statutory language makes abundantly clear, the 1988 amendments sought to address the specific circumstance in which mixed-status families who had been receiving *full* subsidy prior to the statute’s passage could avoid termination and thus prevent family break-up. The amendments accordingly provided for proration of assistance for the family – in lieu of termination – if either the head of household or their spouse had eligible immigration status.<sup>3</sup> In its proposed rule, HUD twists that provision, which provides for temporarily grandfathered assistance, to falsely claim that Congress only intended for prorated assistance to be provided for a limited time for all mixed-status families. Yet HUD ignores the fact that Congress added the proration provisions in 1996.<sup>4</sup> The 1988 amendments thus do not negate the subsequent section of the Act, which continues to mandate proration of assistance in

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<sup>1</sup> 42 U.S.C. § 1436a(i)(2)(A).

<sup>2</sup> 42 U.S.C. § 1436a(b)(2).

<sup>3</sup> Housing and Community Development Act of 1987, Pub. L. No. 100-242, § 164, 101 Stat. 1815.

<sup>4</sup> Use of Assisted Housing by Aliens Act of 1996, Pub. L. No. 104-208, § 572, 110 Stat. 3009.

circumstances where some members of the family have program-eligible status, while others in the family have opted not to contend program eligibility.

Congress has been consistent in striking an effective balance between providing housing subsidies for eligible immigrants and citizens, while also preserving the integrity of mixed-immigration status families. Adoption of HUD's proposed rule ignores the plain meaning of the statute and runs counter to existing law.

## **II. The Proposed Rule Contravenes HUD's Own Express Goals**

HUD claims that the current Administration's regulatory reform efforts compel the proposed rule's implementation, specifically referencing an exhortation in Executive Order 13828 calling on public agencies to "adopt policies to ensure that only eligible persons receive benefits and enforce all relevant laws providing that aliens who are not otherwise qualified and eligible may not receive benefits." In addition, Secretary Carson maintains that implementation of the proposed rule is necessary to address the nationwide subsidized housing waitlist crisis.<sup>5</sup> Yet HUD's proposal to eliminate assistance for mixed status households is misdirected and fails to accomplish its own touted goals.

### **A. The proposed rule will deprive eligible participants of their subsidies and will do nothing to reduce the housing waitlist crisis.**

HUD's unnecessary rule will actually worsen the housing crisis in that it will foment increased displacement and will have the effect of depriving otherwise eligible U.S. citizens and immigrants in mixed households of the ability to access the housing benefits for which they are eligible. Current law already ensures that only eligible individuals receive federal housing subsidies. The provision of prorated assistance for mixed-status families is designed so that those individual family members who have not claimed eligible status are not counted for purposes of calculating the federal subsidy allocated to the family.

Yet under the proposed rule, as many as 108,000 persons in mixed-status households stand to lose their subsidies and homes. Three out of every four individuals in these affected mixed-status families are lawfully eligible for continued federal housing assistance.<sup>6</sup> Moreover, two out of every three of these eligible individuals are U.S. citizens. The negative impact of this proposed rule also extends beyond those participants in mixed-status households. Under the new rule, PHAs and subsidized project owners in every state will be required to re-process eligibility and collect documentation from as many as 9.5 million citizens and 120,000 elderly noncitizens.<sup>7</sup> The rule mandates that all participants declaring U.S. citizen status under penalty of perjury must also provide evidence of their citizenship in the form of documentation, a burdensome and costly

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<sup>5</sup> Tracy Jan, Trump Proposal Would Evict Undocumented Immigrants From Public Housing, Wash. Post (Apr. 18, 2019), [https://www.washingtonpost.com/business/2019/04/18/trump-proposal-would-evict-undocumented-immigrants-public-housing/?utm\\_term=.f68fec836d53](https://www.washingtonpost.com/business/2019/04/18/trump-proposal-would-evict-undocumented-immigrants-public-housing/?utm_term=.f68fec836d53).

<sup>6</sup> HUD, Regulatory Impact Analysis, *Amendments to Further Implement Provisions of the Housing and Community Development Act of 1980*, Docket No. FR-6124-P-01, at 8 (Apr. 15, 2019).

<sup>7</sup> Housing and Community Development Act of 1980: Verification of Eligible Status, 84 Fed. Reg. 20,589, 20,592 (proposed May 10, 2019) (to be codified at 24 C.F.R. part 5).

practice that is unnecessary to protect program integrity.<sup>8</sup> Those participants who are unable to produce this documentation will face program termination and/or eviction, even though their program eligibility has already been established. Eliminating thousands of eligible individuals from federally subsidized housing programs runs contrary to the objectives HUD seeks to achieve.

Moreover, because federal housing assistance to mixed-status households is already prorated, shifting that subsidy to a family comprised entirely of eligible members does not result in a net increase of additional, eligible individuals who may now receive assistance. For example, a mixed status household comprised of two eligible persons and two undeclared status persons is only allocated a subsidy for the two eligible individuals. The elimination of this mixed-status family's assistance will thus only yield a subsidy amount sufficient to assist two newly-admitted individuals. It is undeniable that the U.S. is experiencing an alarming public housing and Section 8 voucher shortage. There are currently 3 million individuals on voucher waitlists around the country, with an additional 6 million that would like to be on these waitlists.<sup>9</sup> In light of these numbers, it is clear that eliminating assistance for mixed-status families – who comprise a mere one percent of all families assisted under HUD-subsidized programs – will not alleviate the housing subsidy crisis.

**B. Elimination of existing mixed-status rules will increase overall costs and will deplete the quality and quantity of affordable housing.**

Additionally, HUD's own analysis indicates that replacing mixed-status households with "fully eligible" ones will actually increase – and not decrease – overall subsidy costs. Data show that these mixed-status households generally have higher incomes than newly admitted families. In light of proration, shifting subsidies away from mixed-status households does not yield an increase in the number of eligible persons who may now be assisted. The amount of subsidy that HUD will accordingly pay for those eligible individuals replacing the mixed-status households will be higher on account of their lower average incomes and lack of proration. Indeed, HUD's own data also indicates that replacing mixed-status families currently receiving HUD assistance with households of members who are all eligible would cost between \$372 million to \$437 million annually.<sup>10</sup> HUD acknowledges that it would have to reduce "the quality and quantity" of federally assisted housing and also serve fewer households under the housing choice voucher program in order to offset these increased costs.<sup>11</sup>

At the national level, the proposed rule will also create new administrative and financial burdens that will compromise efficiency and will place additional strains on local PHAs and entities administering federal housing programs. Eligibility re-processing will subject those participants

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<sup>8</sup> Donna Cohen Ross, *New Medicaid Citizenship Documentation Requirement is Taking a Toll: States Report Enrollment Is Down and Administrative Costs Are Up*, CPBB (Mar. 13, 2007). <https://www.cbpp.org/research/new-medicaid-citizenship-documentation-requirement-is-taking-a-toll-states-report>

<sup>9</sup> See Alicia Mazzara, CBPP, *Housing Vouchers Work: Huge Demand, Insufficient Funding for Housing Vouchers Means Long Waits* (Apr. 19, 2017). <https://www.cbpp.org/blog/housing-vouchers-work-huge-demand-insufficient-funding-for-housing-vouchers-means-long-waits>.

<sup>10</sup> HUD, Regulatory Impact Analysis, *Amendments to Further Implement Provisions of the Housing and Community Development Act of 1980*, Docket No. FR-6124-P-01, at 11 (Apr. 15, 2019).

<sup>11</sup> *Id.*

who are unable to produce the required documentation to program termination or eviction. PHAs and subsidized housing administrators will thus be forced to re-direct their already scarce resources to administer this re-processing, as well as to contend with the increasing number of proposed evictions and program terminations that will ensue once the new rule is enacted. Indeed, multiple PHAs have voiced their opposition to HUD's proposed rule precisely on this basis. As John Clarke, President of the Public Housing Authorities Directors Association (PHADA), notes: "[r]emoving a family is not free. It takes staff time. It takes legal resources. Staff will have to sit in court instead of screening families or going over eligibility applications. It doesn't seem like a quality way to maximize the slim resources we do have."<sup>12</sup>

### **C. HUD's proposed rule contravenes the provisions of key executive orders.**

The proposed rule will also generate consequences that stand in diametrical opposition to the general goals of relevant executive orders that govern administrative agency actions. Executive Order 13828 sets as one of its goals the promotion of "flexibility and accountability both to ensure that State, local, and tribal governments, and other institutions, may tailor their public assistance programs to the unique needs of their communities." Federal policies should therefore "allow local entities to develop and implement programs and strategies that are best for their respective communities." Executive Order 13132 (entitled "Federalism") prohibits an agency from publishing any rule that has federalism implications if the rule "imposes substantial direct compliance costs on State and local governments, and is not required by statute, or preempts State law." However, it is clear that HUD's proposed rule contravenes federal statutes and will actually make it more difficult for states and municipalities to tailor housing opportunities to address their populations' specific housing needs. State and local governments – particularly those encompassing jurisdictions with both significant immigrant populations and housing shortages – will see substantial direct compliance costs if this rule is implemented.

One need only look to California to appreciate the severe impact and compliance costs that states will face if HUD's proposed rule goes into effect. As the state with the largest immigrant population, California is also home to at least 37 percent of the mixed-status households in the United States residing in subsidized housing. Implementation of HUD's proposed rule will further harm these communities through displacement and homelessness, compounding the existing housing problems and related costs with which our state and its municipalities must grapple. California cities are already in the midst of dealing with an unprecedented housing emergency. Exorbitant rental rates, low housing stock availability, and an increasingly insurmountable homelessness crisis continue to contribute to the displacement of immigrant and other low-income tenant populations in our state. The San Francisco Bay Area, where our organization is located, alone has the third-largest homeless population in the United States.<sup>13</sup> The Bay Area's notoriously high rents and existing shortage of affordable and transitional housing means that as much as 67 percent of the area's homeless population is without any form

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<sup>12</sup> Matt Quinn, Public Housing Agencies Oppose HUD's Plan to Evict Immigrant Families, *Governing* (May 21, 2019), <https://www.governing.com/topics/health-human-services/gov-hud-public-housing-immigrants-rule-hearing-congress.html>.

<sup>13</sup> Jill Cowan, How Large is the Bay Area's Homeless Population? *New York Times* (April 10, 2019), <https://www.nytimes.com/2019/04/10/us/bay-area-homeless-population.html>

of shelter.<sup>14</sup> Against this challenging backdrop, one can more clearly appreciate why implementation of HUD’s proposed rule is so harmful to state and local jurisdictions. As many as 937,000 Californians stand to lose their housing if they are unable to comply with the documentation requirements that the proposed rule imposes. Nullification of existing mixed-status regulations eliminates vital housing resources upon which our state relies to shelter this vulnerable population.

#### **D. HUD’s proposal will result in increased litigation and associated costs.**

If enacted, the proposed rule will expose HUD, PHAs and subsidized property owners to substantial litigation risks, thus undermining HUD’s express goals of promoting efficiency and streamlining of processes. First, PHAs and subsidized property owners will be forced to divert their personnel and monetary resources to litigating eviction actions not only against mixed-status households, but also against otherwise eligible program participants unable to produce the required documentation mandated under the rule's eligibility re-processing requirements.<sup>15</sup> Secondly, in light of how the rule disproportionately impacts people of color, the disabled, domestic violence survivors, and families with children, its implementation carries with it significant fair housing implications that will subject HUD and its program providers to increased risks of discrimination-related lawsuits.

#### **E. The rule would violate HUD’s obligation to affirmatively further fair housing.**

If implemented, this proposed rule would abrogate HUD’s statutory duty to affirmatively further fair housing. The Fair Housing Act (FHA) requires HUD to “administer the programs and activities relating to housing and urban development in a manner affirmatively to further the policies of” the FHA.<sup>16</sup> HUD defines “affirmatively furthering fair housing” to mean “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.”<sup>17</sup> The affirmatively furthering fair housing obligation also includes “fostering and maintaining compliance with civil rights and fair housing laws.”<sup>18</sup>

The proposed rule impedes the advancement of fair housing aims and stymies compliance with other civil rights laws. Indeed, it will serve to deny housing opportunities to thousands of immigrant families by employing immigration status as a pretext to discriminate against individuals based on their race and national origin. It is clear that elimination of the current mixed-status regulations will disproportionately impact communities of color. People of color alone comprise almost two-thirds of program participants who would be subject to the new rule’s onerous documentation requirements. Provision of federal housing subsidies aided in lifting approximately 800,000 Latinx persons out of poverty in 2017, more than 280,000 of whom are

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<sup>14</sup> *Id.*

<sup>15</sup> Matt Quinn, Public Housing Agencies Oppose HUD’s Plan to Evict Immigrant Families, *Governing* (May 21, 2019), <https://www.governing.com/topics/health-human-services/gov-hud-public-housing-immigrants-rule-hearing-congress.html>.

<sup>16</sup> 42 U.S.C.A. § 3608(e)(5).

<sup>17</sup> 24 C.F.R. § 5.152 (definition of “Affirmatively furthering fair housing”).

<sup>18</sup> *Id.*

children.<sup>19</sup> Enactment of this proposed rule would reverse this otherwise promising trend, as more than 85 percent of persons in mixed-status households who face termination of their assistance are Latinx/Hispanic. Asian American/Pacific Islanders (AAPIs) receiving housing assistance under the covered programs will also be disproportionately impacted by this proposed rule. As of 2018, more than 250,000 AAPIs received HUD subsidized housing assistance, many of whom form part of mixed-status households.<sup>20</sup> Implementation of HUD’s proposal will exacerbate the already high incidents of displacement that low-income AAPI individuals in the U.S. face relative to their counterparts.<sup>21</sup>

Furthermore, HUD’s very own data show that 70 percent of the households negatively impacted by this proposed rule are families with eligible children.<sup>22</sup> As minor children comprise the vast majority of eligible occupants of mixed-status households,<sup>23</sup> the proposed rule would also have a disproportionate and devastating impact on families with children. This clearly discriminatory policy is wholly inconsistent with HUD’s obligation to combat housing discrimination and segregation.

### **III. HUD’s Regulatory Impact Analysis Does Not Support Adoption of the Proposed Rule**

Executive Order 12866 requires Federal agencies to assess the costs and benefits of any significant regulatory action, including, but not limited to, the action’s expected effects on “the efficient functioning of the economy and private markets, the enhancement of health and safety ... and the elimination or reduction of discrimination or bias.”<sup>24</sup> HUD is required to “assess both the costs and the benefits of the intended regulation and, recognizing that some costs and benefits are difficult to quantify, propose or adopt a regulation only upon a reasoned determination that the benefits of the intended regulation justify its costs.”<sup>25</sup>

HUD’s cost-benefit analysis is deficient in numerous ways. First, HUD severely undervalues the costs of the proposed rule to mixed-status families. Second, HUD fails to assess the costs of reducing the quantity and quality of assisted housing. Third, HUD does not account for the costs of the new documentation requirement to citizens and eligible elderly immigrants. Fourth, HUD fails to recognize and monetize the administrative costs required to implement the proposed rule. Fifth, HUD neglects to support the purported benefits of the rule with any evidence or

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<sup>19</sup> UnidosUS, “Federal Programs Lift Millions of Latinos Out of Poverty” (Washington, DC: UnidosUS, October 2018). <http://publications.unidosus.org/handle/123456789/1894>.

<sup>20</sup> US Department of Housing and Urban Development, Picture of Subsidized Households, 2018. <https://www.huduser.gov/portal/datasets/assths.html>

<sup>21</sup> National CAPACD analysis of US Census data (5-Year ACS, (2016). <https://www.nbcnews.com/news/asian-america/squeezed-rents-stagnant-incomes-communities-find-solutions-report-n572041>

<sup>22</sup> HUD, Regulatory Impact Analysis, *Amendments to Further Implement Provisions of the Housing and Community Development Act of 1980*, Docket No. FR-6124-P-01, at 8 (Apr. 15, 2019)

<sup>23</sup> *Id.* at 6 (noting that in mixed-status households, 73 percent of eligible occupants are children between 0 and 17 years old).

<sup>24</sup> Exec. Order No. 12866 § 6(a)(3)(C), 58 Fed. Reg. 51, 735 (Oct. 4, 1993). This rule was determined to be a significant regulatory action for the purposes of Executive Order 12866. 84 Fed. Reg. 19, 20591 (May 10, 2019).

<sup>25</sup> Exec. Order No. 12866 § 1(b)(6).

explanation. Finally, HUD does not adequately analyze the regulatory alternatives and fails to explain why it has opted to pursue the proposed rule in lieu of the less costly alternatives.

#### **A. HUD does not adequately assess the cost to mixed-status families.**

HUD underestimates the costs to mixed-status families by making unsubstantiated assumptions about how these families will react to the proposed rule, failing to include evident costs, and undervaluing the costs it does assess.

##### *1. HUD does not provide sufficient evidence to support its assumptions regarding mixed-status families' responses to the proposed rule.*

In the Regulatory Impact Analysis (“Analysis”), HUD assumes that smaller mixed-status households consisting of parents and children will leave HUD’s assisted housing as a result of the proposed rule.<sup>26</sup> HUD declares without any evidentiary substantiation that that these households are unlikely to separate in order to retain housing assistance because removing a non-qualifying parent would not maximize the welfare of the family: “The economic benefit of children growing in a two-parent household outweighs the financial assistance from the housing subsidy. Even if a parent is willing to sacrifice him- or herself for the sake of the household’s continuing receipt of housing assistance; a household would probably suffer a worse outcome by trying to adapt to the new rules than by leaving together.”<sup>27</sup> HUD may be correct in some instances, such as where there is no eligible adult household member and therefore the family is left with no choice but to leave their subsidized housing.<sup>28</sup> However, in instances where the family has an option of retaining their federal housing subsidy through forced family separation, it is far more likely that they will separate than HUD assumes.<sup>29</sup>

HUD’s own regulations recognize that households often make the challenging decision to separate from family members in order to maintain their subsidized housing.<sup>30</sup> Our clients rarely have any alternative affordable housing options. When faced with the decision to maintain safe and affordable housing for their children, or for the whole family to leave and face homelessness or displacement from their community, they often feel they have no choice but to split up. In addition, leaving HUD assisted housing often will not actually result in preserving family unity;

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<sup>26</sup> HUD, Regulatory Impact Analysis, *Amendments to Further Implement Provisions of the Housing and Community Development Act of 1980*, Docket No. FR-6124-P-01, at 7-9 (Apr. 15, 2019).

<sup>27</sup> *Id.* at 9.

<sup>28</sup> HUD does not specify the number of “Case 2” families (eligible children and ineligible parents) that have at least one eligible adult. It is therefore impossible to assess how many of these households have the option of retaining their federal housing subsidy through forced family separation.

<sup>29</sup> See, e.g., Douglas Walton, Michelle Wood, & Lauren Dunton, *Child Separation among Families Experiencing Homelessness*. Office of Planning, Research and Evaluation (OPRE), Administration for Children and Families, U.S. Department of Health and Human Services (March 2018), [https://www.acf.hhs.gov/sites/default/files/opre/opre\\_child\\_separation\\_brief\\_03\\_22\\_2018\\_508\\_2.pdf](https://www.acf.hhs.gov/sites/default/files/opre/opre_child_separation_brief_03_22_2018_508_2.pdf); Katy O’Donnell, *HUD moves to crack down on undocumented immigrants in public housing*, POLITICO (March 4, 2019), <https://politi.co/2UL5m7u> (families are more likely to separate than to lose their subsidized unit).

<sup>30</sup> See, e.g., 24 C.F.R. § 5.852(b); 24 C.F.R. § 982.310(h)(2); 24 C.F.R. § 982.552(c)(2)(ii) (households can exclude the “culpable” member in order to qualify for admission or avoid termination or eviction).

the only alternative usually available to our clients is a homeless shelter, and some shelter policies prevent two parent households and adult children from all staying together.<sup>31</sup>

HUD erroneously assumes, again without any evidentiary substantiation, that low-income households have adequate information, agency, and options to make what it defines as the “welfare maximizing decision.”<sup>32</sup> This assumption results in HUD’s failure to meaningfully consider the cost of forced family separation which will result in high social and public health costs in the decades to come.

HUD also makes the assumption that mixed-status families will leave voluntarily if the proposed rule is implemented.<sup>33</sup> HUD bases this assumption on the fact that non-qualifying household members are likely to be fearful of the consequences and that “[i]neligible members are likely to be illegal residents...”<sup>34</sup> These unsubstantiated assumptions result in HUD’s misguided conclusion that formal eviction will only be necessary in limited cases. HUD’s wager is that tenants’ will not have the ability to educate themselves on the scope and consequences of the proposed rule and to advocate for their legal rights. This is a dangerous and ultimately costly underestimation of the abilities of these households. In places like the San Francisco Bay Area, strong tenant and immigrant protections and a high-cost rental market mean that mixed-status families are more empowered and incentivized to assert their rights in court. HUD also fails to recognize that tenants who do not qualify for Section 214 housing are not necessarily undocumented. There are a number of categories of immigrants who are legally residing in the U.S. but are not eligible for Section 214 housing.<sup>35</sup>

## 2. HUD does not account for the cost of forced family separation.

HUD’s assumption that mixed-status households will leave together results in a failure to accurately account for the high costs of family separation that will result from the proposed rule. Even when HUD does acknowledge that there is a cost of no longer being proximate to non-qualifying family members that are forced to leave,<sup>36</sup> HUD fails to quantify or elaborate on this cost. Forced separation from parents and siblings can be emotionally devastating and disturbing

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<sup>31</sup> See, e.g., Marybeth Shinn, Jessica Gibbons- Benton, & Scott R. Brown, Poverty, *Homelessness, and Family Break-Up*, CHILD WELFARE, 94(1) (2015), 105–122 (attached) (“Of 2,307 parents recruited in family shelters across 12 sites, one-tenth were separated from partners and one quarter from one or more children.”); United States Interagency Council on Homelessness, *Supplemental Document to the Federal Strategic Plan to Prevent and End Homelessness: June 2010: Homelessness Among Youth*, Washington, D.C. (2010) (attached) (“Shelter policies regarding adolescent children can lead to family separation as older and adolescent males are frequently required to be housed in male, adult shelters.”).

<sup>32</sup> See Kimberly Skobba & Edward G.Goetz, *Mobility Decisions of Very Low-Income Households*, CITYSCAPE 15(2) (2013) 155-171, <https://www.huduser.gov/portal/periodicals/cityscape/vol15num2/ch11.pdf>.

<sup>33</sup> HUD, Regulatory Impact Analysis, *Amendments to Further Implement Provisions of the Housing and Community Development Act of 1980*, Docket No. FR-6124-P-01, at 14 (Apr. 15, 2019).

<sup>34</sup> *Id.* at 7, 14.

<sup>35</sup> Currently, legal immigrants that do not qualify for Section 214 housing include U-visa holders (for victims of violence), recipients of Deferred Action for Childhood Arrivals (DACA), student visa holders, employment visa holders, and Temporary Protected Status recipients.

<sup>36</sup> HUD, Regulatory Impact Analysis, *Amendments to Further Implement Provisions of the Housing and Community Development Act of 1980*, Docket No. FR-6124-P-01, at 11 (Apr. 15, 2019).

and lead to “feelings of immense sadness, loneliness, loss, confusion, and depression.”<sup>37</sup> The stressful and traumatizing experience for children of being separated from their family members can alter the architecture of a child’s developing brain and have lifelong consequences.<sup>38</sup> Even a temporary separation can have an enormous negative impact on the health and educational attainment of children later in life, and it may permanently disrupt the parent-child bond beyond repair.<sup>39</sup> These costs, including the future healthcare costs of triggering Adverse Childhood Experiences for the U.S. citizen children in these households,<sup>40</sup> must be considered in analyzing the impact of the proposed rule.

### 3. HUD’s assessment of eviction costs is insufficient.

HUD’s assessment of eviction costs is extraordinarily short-sighted in that it is limited to the expenses that would be imminently incurred by HUD. The Analysis does not include the costs that tenants would face in fighting an eviction, such as court costs, missed work, childcare, and attorney costs. The Analysis does not include the costs to the local courts of processing the eviction lawsuits. The Analysis does not include the costs to legal service providers of representing eligible tenants in their eviction cases. The Analysis does not include eviction costs for non-qualifying members separating from the rest of the household and leaving the unit<sup>41</sup> and does not provide a basis for this decision or articulate a rationale for excluding this in the Analysis.

HUD also fails to include the non-monetary but well-studied social costs of evictions. These costs include greater risk of homelessness, adverse physical and mental health outcomes, loss of employment, and decreased educational outcomes.<sup>42</sup> By providing such an incomplete analysis

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<sup>37</sup> See Arshi Shaikh & Hiren Rawal, *Interconnections among Homelessness, Family Separation, and Mental Health: Implications for Multi-Sectoral Social Services*, JOURNAL OF SOCIAL SERVICE RESEARCH, 45:4 (2018), 543-557 (attached).

<sup>38</sup> See Shruti Simha, *The Impact of Family Separation on Immigrant and Refugee Families*, 80 N C MED J. 95, 96 (2019), <http://www.ncmedicaljournal.com/content/80/2/95>.

<sup>39</sup> See Laura C. N. Wood, *Impact of Punitive Immigration Policies, Parent-Child Separation and Child Detention on the Mental Health and Development of Children*, 2 BMJ PAEDIATRICS OPEN (2018), <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6173255>.

<sup>40</sup> See, e.g., CENTERS FOR DISEASE CONTROL AND PREVENTION, ADVERSE CHILD EXPERIENCES (last visited July 7, 2019), <https://www.cdc.gov/violenceprevention/childabuseandneglect/acestudy/index.html>.

<sup>41</sup> HUD, Regulatory Impact Analysis, *Amendments to Further Implement Provisions of the Housing and Community Development Act of 1980*, Docket No. FR-6124-P-01, at 14 (Apr. 15, 2019).

<sup>42</sup> See Allison Bovell-Ammon & Megan Sandel, *The Hidden Health Crisis of Eviction*, BOS. U. SCH. OF PUB. HEALTH (2018), <http://www.bu.edu/sph/2018/10/05/the-hidden-health-crisis-of-eviction>; Desmond M. & Tolbert Kimbro R., *Evictions Fallout: Housing, Hardship, and Health*, 94 SOCIAL FORCES 295 (2015), [https://scholar.harvard.edu/files/mdesmond/files/desmondkimbro.evictions.fallout.sf2015\\_2.pdf](https://scholar.harvard.edu/files/mdesmond/files/desmondkimbro.evictions.fallout.sf2015_2.pdf); Will Fischer, *Research Shows Housing Vouchers Reduce Hardship and Provide Platform for Long-Term Gains Among Children*, CENTER ON BUDGET AND POLICY PRIORITIES (October 7, 2015), <https://www.cbpp.org/research/research-shows-housing-vouchers-reduce-hardship-and-provide-platform-for-longterm-gains>; Linda Giannarelli et al., *Reducing Child Poverty in the US: Costs and Impacts of Policies Proposed by the Children’s Defense Fund* (Jan. 2015), <http://www.childrensdefense.org/library/PovertyReport/assets/ReducingChildPovertyintheUSCostsandImpactsofPoliciesProposedbytheChildrensDefenseFund.pdf>; HEATHER SANDSTROM & SANDRA HUERTA, *THE NEGATIVE EFFECTS OF INSTABILITY ON CHILD DEVELOPMENT: A RESEARCH SYNTHESIS* (2013), <https://www.urban.org/sites/default/files/publication/32706/412899-The-Negative-Effects-of-Instability-on-Child-Development-A-Research-Synthesis.PDF>.

of costs, HUD fails to account for the cost-shifting burden that will fall upon the healthcare system, state and local governments, and other entities.

4. *HUD fails to properly consider the costs of homelessness.*

HUD does recognize that there is a potential outcome of homelessness, yet inexplicably decides to omit this cost from the calculation of total costs.<sup>43</sup> HUD also elects to omit assessing what number of mixed-status household members will face homelessness as a result of this proposed rule. Yet it is well established that evictions are a primary cause of homelessness, especially in areas like the San Francisco Bay Area where there is an affordable housing crisis.<sup>44</sup> Once again HUD fails to consider the social costs when assessing the cost of homelessness.<sup>45</sup>

5. *HUD's identification of moving costs is lacking.*

While HUD does address moving costs, the Analysis limits these costs to the “search for a new apartment, mak[ing] a deposit on a new apartment, and then mov[ing] to the new apartment.”<sup>46</sup> This is short-sighted and incomplete – HUD does not include consideration of the costs of temporary storage, changing neighborhoods, leaving one’s established community, having to change schools or jobs, seeking new healthcare providers, incurring new or increased transportation costs, or facing unemployment. HUD also elects to exclude moving costs for non-qualifying members leaving the unit,<sup>47</sup> and does not provide any basis for this decision or articulate a rationale for excluding this cost in the Analysis.

6. *HUD severely undervalues replacement housing costs.*

The Analysis grossly undervalues the cost of finding replacement housing. HUD claims that in order to find alternative housing, mixed-status families need only come up with an addition \$1,900 per person per year to offset the benefit of the federal housing subsidy.<sup>48</sup> HUD does not provide any explanation or citation for how this value was determined, which is particularly concerning since it seems unrealistically low. HUD recognizes that the average income of a mixed-status household is \$18,000.<sup>49</sup> Yet, the median rent (including utilities) for an apartment in California was \$1,450/month in 2017.<sup>50</sup> The circumstances are even more extreme for our clients. As detailed above, the San Francisco Bay Area is plagued by exorbitant rental rates, low

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<sup>43</sup> HUD, Regulatory Impact Analysis, *Amendments to Further Implement Provisions of the Housing and Community Development Act of 1980*, Docket No. FR-6124-P-01, at 13 (Apr. 15, 2019) (Summary of Costs table specifies that costs “do not include homelessness.”)

<sup>44</sup> *Protect Tenants, Prevent Homelessness*, National Law Center on Homelessness & Poverty (Oct. 2018), <http://nlchp.org/wp-content/uploads/2018/10/ProtectTenants2018.pdf>.

<sup>45</sup> HUD, Regulatory Impact Analysis, *Amendments to Further Implement Provisions of the Housing and Community Development Act of 1980*, Docket No. FR-6124-P-01, at 16 (Apr. 15, 2019) (“The costs of homelessness to society can be substantial, arising from the provision of transitional shelters and community supports, emergency services, health care, and criminal justice system.”); *see supra* note 42.

<sup>46</sup> HUD, Regulatory Impact Analysis, *Amendments to Further Implement Provisions of the Housing and Community Development Act of 1980*, Docket No. FR-6124-P-01, at 13-14 (Apr. 15, 2019).

<sup>47</sup> *Id.* at 14.

<sup>48</sup> *Id.* at 15.

<sup>49</sup> *Id.* at 12.

<sup>50</sup> *See* CBPP, *California Federal Rental Assistance Fact Sheet* (May 14, 2019), <https://www.cbpp.org/research/housing/federal-rental-assistance-fact-sheets#CA>.

housing stock availability, and an increasingly insurmountable homelessness crisis. In addition, immigrants and their families face additional barriers in finding affordable housing.<sup>51</sup> Compared to U.S. citizens, immigrant families are more likely to have higher housing costs, are more likely to face housing cost burdens, and are more likely to report difficulty paying for housing.<sup>52</sup> The Analysis disregards the unique costs faced by immigrants in the U.S. housing market.

### **B. HUD fails to assess the costs of reducing the quantity and quality of federally-assisted housing.**

The Analysis recognizes that HUD will ultimately decrease the number of households that receive federal housing subsidies since there is no increase in HUD's budget to offset the \$372-\$437 million in annual costs of implementing the proposed rule.<sup>53</sup> HUD declares that "... it is likely that the higher per household subsidies would be paid for by reducing average spending on housing assistance for all households, or reducing the number of households served."<sup>54</sup> HUD also acknowledges that it would likely be forced to reduce "maintenance of [public housing] units and possibly [resulting in] deterioration of the units that could lead to vacancy."<sup>55</sup> HUD fails to address the cost of how reducing federal housing subsidies would worsen the waitlist crisis for subsidized housing.<sup>56</sup> And HUD fails to assess the costs associated with a reduction in the quality of public housing. The conditions our public housing clients live in already fail to live up to the promise of "decent, safe, and sanitary"<sup>57</sup> – mold, roaches, rodents, water intrusion, faulty plumbing – and PHAs have long had insufficient funding to make necessary repairs.<sup>58</sup> Uninhabitable housing creates health costs for all tenants, rent abatement claims, and liability for HUD; none of these costs are addressed in the Analysis.

### **C. HUD fails to account for the costs of the new documentation requirements to citizens and eligible elderly non-citizens.**

HUD completely fails to recognize the costs to citizens and elderly eligible immigrants who would be forced to meet new documentation requirements under the proposed rule. Currently,

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<sup>51</sup> See ROBERT WOOD JOHNSON FOUND., *LIVING IN AMERICA* (Katherine E. Garrett ed., 2006), <https://www.rwjf.org/en/library/research/2006/08/living-in-america.html>.

<sup>52</sup> Eileen Diza McConnell, *Who Has Housing Affordability Problems? Disparities in Housing Cost Burden by Race, Nativity and Legal Status in Los Angeles*, 5 RACE & SOCIAL PROBLEMS 173, 178 (2013), <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3784340/pdf/nihms440365.pdf>.

<sup>53</sup> HUD, Regulatory Impact Analysis, *Amendments to Further Implement Provisions of the Housing and Community Development Act of 1980*, Docket No. FR-6124-P-01, at 11 (Apr. 15, 2019).

<sup>54</sup> *Id.* at 13.

<sup>55</sup> *Id.* at 3.

<sup>56</sup> See Alicia Mazzara, CBPP, *Housing Vouchers Work: Huge Demand, Insufficient Funding for Housing Vouchers Means Long Waits* (Apr. 19, 2017), <https://www.cbpp.org/blog/housing-vouchers-work-huge-demand-insufficient-funding-for-housing-vouchers-means-long-waits> (approximately 3 million families are currently on voucher waitlists, and an additional 6 million would be on these lists if the waiting lists had not been closed).

<sup>57</sup> See, e.g., Betty Marquez Rosales & Ravleen Kaur, *Rodents, Roaches and Broken Elevators: Why it Took Nearly a Decade for Richmond to Fix Public Housing*, RICHMOND CONFIDENTIAL (Nov. 3, 2018), <https://richmondconfidential.org/2018/11/03/rodents-roaches-and-broken-elevators-why-it-took-nearly-a-decade-for-richmond-to-fix-public-housing/>.

<sup>58</sup> Pam Fessler, *Trump Administration Wants to Cut Funding for Public Housing Repairs*, NPR (May 16, 2019), <https://www.npr.org/2019/05/16/723231160/trump-administration-wants-to-cut-funding-for-public-housing-repairs> (Public housing officials estimate there is currently a \$50 billion backlog of desperately needed repairs).

U.S. citizens and elderly non-citizens establish their eligibility for federal housing assistance by submitting a signed declaration, under penalty of perjury, attesting to their citizenship or immigration status. Under the proposed rule, HUD would require housing agencies and private landlords to collect additional documentation such as a birth certificate or passport.

The Analysis fails to take into account that birth certificates, passports, and nationality documentation can be very difficult for low-income individuals to provide, especially for women, people of color, survivors of domestic violence, and individuals with disabilities.<sup>59</sup> Obtaining documents such as a birth certificate can be costly and time consuming.<sup>60</sup> It often requires other documents that participants may also lack, such as a government-issued photo ID, and there are fees that low-income individuals may not be able to afford. Translating documents from other languages into English can be costly and time consuming. Tenants and applicants who could not provide the newly required documentation would lose their rental assistance or be denied admission and risk homelessness as a result.

By assuming that such documents are already on-hand or easy to obtain, HUD demonstrates further ignorance of the low-income population which it has been tasked to serve. HUD has failed to recognize that this new requirement could result in the loss of subsidized housing for eligible tenants and has neglected to assess the cost of this requirement for tenants and applicants.

#### **D. HUD fails to recognize and monetize the administrative costs of implementing the proposed rule.**

Throughout the Analysis, HUD omits obvious administrative costs associated with the proposed rule. HUD does not include administrative costs in the Summary of Costs table,<sup>61</sup> claims that “[a]dministrative costs are not expected,”<sup>62</sup> and while recognizing that some activities would require more administrative work load and costs, concludes that these costs would be “small and insignificant.”<sup>63</sup> As stated above in Section II subsection B, Public Housing Authorities have pointed out the error in HUD’s assessment.

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<sup>59</sup> See, e.g., Brennan Center for Justice, “Citizens Without Proof: A Survey of Americans’ Possession of Documentary Proof of Citizenship and Photo Identification,” NYU School of Law, November 2006, [https://www.brennancenter.org/sites/default/files/legacy/d/download\\_file\\_39242.pdf](https://www.brennancenter.org/sites/default/files/legacy/d/download_file_39242.pdf); Robert Greenstein, Leighton Ku, and Stacy Dean, “Survey Indicates House Bill Could Deny Voting Rights to Millions of U.S. Citizens,” Center on Budget and Policy Priorities, September 22, 2006, <https://www.cbpp.org/research/survey-indicates-house-bill-coulddeny-voting-rights-to-millions-of-us-citizens>; Donna Cohen Ross, “New Medicaid Citizenship Documentation Requirement Is Taking a Toll: States Report Enrollment Is Down and Administrative Costs Are Up,” Center on Budget and Policy Priorities, March 13, 2007, <https://www.cbpp.org/research/new-medicaid-citizenship-documentationrequirement-is-taking-a-toll-states-report>; Government Accountability Office, “States Reported That Citizenship Documentation Resulted in Enrollment Declines for Eligible Citizens and Posed Administrative Burdens,” GAO-07- 889, June 2007, <https://www.gao.gov/products/GAO-07-889>.

<sup>60</sup> See, e.g., Center on Budget and Policy Priorities, “The New Medicaid Citizenship Documentation Requirement: An Overview,” April 20, 2006, <https://www.cbpp.org/research/the-new-medicaidcitizenship-documentation-requirement>.

<sup>61</sup> HUD, Regulatory Impact Analysis, *Amendments to Further Implement Provisions of the Housing and Community Development Act of 1980*, Docket No. FR-6124-P-01, at 13 (Apr. 15, 2019).

<sup>62</sup> *Id.* at 4.

<sup>63</sup> *Id.* at 17..

There will be costs of implementing the proposed rule such as changing written policies and training housing provider staff. Housing authority staff and landlords will have to inform all tenants of the change in documentation requirements since citizens, eligible immigrants, and tenants who have not contested their eligible immigration status will all need to submit additional documentation under the proposed rule. It is expected that these changes will require more staff time at both the application and recertification stage.<sup>64</sup>

When discussing the submission of evidence of eligible immigration status for current participants who have not claimed eligibility, HUD summarily declares that “[m]ost are likely not to be eligible and so there will be no additional work.”<sup>65</sup> This fails to take into account that the proposed rule would then require the housing provider to commence termination or eviction lest they violate due process requirements. And as detailed above, HUD completely disregards the fact that there will likely be citizens and eligible immigrants who will face termination and eviction proceedings because of the barriers to obtaining the new required documentation.

HUD acknowledges in a footnote that tenants are entitled to a grievance procedure when notified of termination or eviction.<sup>66</sup> And yet HUD does not mention the costs associated with administering the grievance process in instances where an expected 25,000 households have to be terminated. And even if HUD is correct in wagering that tenants who have not claimed eligibility may not feel safe fighting their termination in court, the administrative process is less threatening and more accessible and thus it is outrageous that HUD should assume that tenants will similarly be scared away from exercising their due process rights.

Once all of the households that cannot meet the requirements under the proposed rule have been terminated or evicted, Housing Authorities then face the administrative cost of processing applicants from the waitlist. HUD recognizes that “the cost of turnover may be sizeable”<sup>67</sup> and that “the turnover that is created as a result of the requirement will generate administrative costs.”<sup>68</sup> Turnover will entail eligibility screening, repairing and inspecting units, processing new household paperwork, reviewing leases, and entering into HAP contracts. HUD does not state the amount of sizeable turnover costs, or provide any explanation for why an amount cannot be stated.

HUD is in the unique position to make quantitative estimates of the expenses and staff time required to implement policy changes, train staff on new policies, re-process eligibility documentation, issue termination or eviction notices, facilitate grievance hearings, litigate evictions, repair recently vacated units, screen new households for eligibility, inspect new

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<sup>64</sup> See, e.g., U.S. GOV'T ACCOUNTABILITY OFFICE, *Medicaid: States Reported That Citizenship Documentation Requirement Resulted in Enrollment Declines for Eligible Citizens and Posed Administrative Burdens* (June 2007), <https://www.gao.gov/new.items/d07889.pdf> (after Medicaid began implementing a citizenship documentation requirement, states reported increased administrative costs: staff had to spend more time providing help to applicants and beneficiaries, on applications, and on redeterminations of eligibility).

<sup>65</sup> HUD, Regulatory Impact Analysis, *Amendments to Further Implement Provisions of the Housing and Community Development Act of 1980*, Docket No. FR-6124-P-01, at 17 (Apr. 15, 2019).

<sup>66</sup> *Id.* at fn. 10.

<sup>67</sup> *Id.* at 4.

<sup>68</sup> *Id.* at 17.

properties, and process new household paperwork. And yet HUD has elected to exclude and disregard all of these critical costs in the Analysis.

**E. The purported benefits of the proposed rule are unsupported by evidence or explanation.**

HUD claims that there are a number of benefits to the proposed rule without providing adequate evidence or explanation to support these claims. The Analysis states that the proposed rule would reduce unnecessary regulatory burdens.<sup>69</sup> Yet HUD fails to elaborate on how increasing verification requirements would reduce, rather than increase, regulatory burdens. The Analysis also claims that the proposed rule would make current regulations more “effective” without explaining what it means by “effective.”<sup>70</sup> And HUD claims that the proposed rule would enhance the “rule of law” without justifying the underlying assumption that the proposed rule is more consistent with Section 214 than the current regulations.<sup>71</sup> As elaborated on in Section I above, the proposed rule is not more consistent as it ignores the plain meaning of the statute and runs counter to existing law. Finally, HUD inappropriately includes the amount of transfers in its assessment of benefits, claiming that it “is illustrative of the portion of the transfer redirected to better target housing subsidies to the intended recipients.”<sup>72</sup> “Transfer payments are monetary payments from one group to another that do not affect total resources available to society” and therefore should not be included in the estimates of the benefits of a regulation.<sup>73</sup> The supposed benefits claimed by HUD may be difficult to quantify. But this does not excuse HUD from the requirement to “carry out a careful evaluation of non-quantified benefits and costs.”<sup>74</sup>

**F. HUD does not adequately analyze regulatory alternatives.**

HUD identifies and briefly describes two alternatives that would be less costly and would achieve a similar objective to the proposed rule.<sup>75</sup> And yet HUD fails to explain why it has opted to pursue the proposed rule in lieu of these less costly and relatively more humane alternatives.

Given the high costs that HUD does recognize, the numerous costs that HUD failed to include, the unsubstantiated and summary nature of the claimed benefits, and HUD’s inability to explain the reason for forgoing less costly alternatives, HUD’s examination of the benefits is inadequate for the purpose of determining if the proposed rule is cost-benefit justified.

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<sup>69</sup> *Id.* at 10.

<sup>70</sup> *Id.*

<sup>71</sup> *Id.*

<sup>72</sup> *Id.*

<sup>73</sup> OFFICE OF MGMT. & BUDGET, EXEC. OFFICE OF THE PRESIDENT, OMB CIRCULAR A-4, REGULATORY ANALYSIS 26-27 (2003).

<sup>74</sup> *Id.* at 38.

<sup>75</sup> HUD, Regulatory Impact Analysis, *Amendments to Further Implement Provisions of the Housing and Community Development Act of 1980*, Docket No. FR-6124-P-01, at 17 (Apr. 15, 2019).

## **IV. The Proposed Rule Will Harm Vulnerable Populations**

### **A. Children**

The proposed rule endangers the overall wellbeing of children and will result in the eviction of over 55,000 minors who are otherwise eligible for subsidized housing.<sup>76</sup> As these children lack the legal capacity to enter into lease agreements, the adult heads of household, including those who do not receive assistance, must sign and administer these leases on behalf of their children. Yet, by prohibiting the non-assisted adults from living in subsidized units, HUD is directly eliminating covered housing assistance for these U.S. citizen and LPR children.

We at Bay Area Legal Aid have seen all too well how retaining subsidized housing options for mixed-status families is critical to promoting safety and stability for children. One of our clients, a minor child with disabilities, was living with his undocumented mother as part of a mixed-status household in public housing. The child suffered from very severe asthma—one of the most severe cases the SF General Hospital asthma clinic has ever seen—and he required medical injections every two weeks to help manage his asthma. The stability of medical care was life-saving, and having stable, subsidized housing was also crucial to this child continuing his medical treatments and receiving care and support from his mother.

Indeed, the proposed rule will invariably lead to mass family separations and will force families to make harmful choices that will undermine their children's health. Mixed-status families will be compelled to make the arduous decision to either completely abandon their subsidized housing as a family unit, or to separate in order for the eligible members to retain their assistance. However, those families comprised solely of eligible children and non-assisted adults will be afforded no choice but to fully abandon the assisted housing, as the proposed regulation prohibits these adults from administering the lease. Whatever the case may be, it is clear these destabilizing scenarios will produce long-term impacts on child and family health. Studies show that families who undergo eviction are more likely to experience chronic homelessness, to settle into uninhabitable or overcrowded housing, and be susceptible to a deterioration of their physical and mental health.<sup>77</sup> The alternative – family separation – is no better, as it produces stress and trauma for the children that can stymie their long-term development.<sup>78</sup>

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<sup>76</sup> HUD, Regulatory Impact Analysis, Amendments to Further Implement Provisions of the Housing and Community Development Act of 1980, Docket No. FR-6124-P-01, at 6-8 (Apr. 15, 2019) (73% of eligible family members are children and there are a total of 76,141 eligible individuals in the covered programs, for a total of 55,582 eligible children; 70% of households are composed of eligible children with ineligible parents, for a total of 38,907 eligible children in households with ineligible parents).

<sup>77</sup> Bovell-Ammon A & Sandel M., *The Hidden Health Crisis of Eviction*, BOS. U. SCH. OF PUB. HEALTH (2018). <http://www.bu.edu/sph/2018/10/05/the-hidden-health-crisis-of-eviction/>; Desmond M. & Tolbert Kimbro R., *Evictions Fallout: Housing, Hardship, and Health*, 94 SOCIAL FORCES 295 (2015).

<sup>78</sup> Simha S., *The Impact of Family Separation on Immigrant and Refugee Families*, 80 N C MED J. 95, 96 (2019). <http://www.ncmedicaljournal.com/content/80/2/95.full.pdf+html>

## B. The Elderly

More than 1.9 million seniors who are otherwise unable to afford market-rate housing in the U.S. depend on federal subsidies for their shelter.<sup>79</sup> As a consequence of their age, limited incomes, and higher incidents of disability, the elderly already struggle to obtain food, clothing, shelter, medications, and other essentials for daily living.<sup>80</sup> Seniors who reside in mixed-status households will thus be subject to long-term homelessness if HUD's proposed rule goes into effect. The proposed rule will also prevent intergenerational, assisted families from living together and will negatively impact these families' cohesiveness, stability, and success. HUD's proposal ultimately ignores the valuable resources that live-in grandparents provide through childcare for minor household members, and also fails to acknowledge the critical role that adult household members play in providing long-term care for these elderly relatives.

Moreover, eligible seniors who do not otherwise form part of mixed-status households will also face increased risk of displacement under HUD's proposed rule. We have previously noted how HUD's new rule provisions will 1) require all U.S. citizens assisted under the covered programs to furnish documentary proof of citizenship, and 2) compel as many as 120,000 eligible, noncitizen seniors to provide additional documentation of their immigration status.<sup>81</sup> Elderly individuals will face serious obstacles in obtaining this documentation in light of difficulties with locating papers provided to them several years ago, navigating trips to government offices to obtain the information, or saving up for fees associated with generating or replacing lost documentation.<sup>82</sup>

## C. People with Disabilities

People with disabilities comprise a large percentage of the individuals served in programs - covered under the proposed rule. According to HUD data, about 20 percent of households that receive HUD rental assistance include at least one disabled household member.<sup>83</sup> People with disabilities often have extremely limited income<sup>84</sup> and are subject to increased incidences of housing discrimination.<sup>85</sup> Along with seniors, persons with disabilities will also face significant

<sup>79</sup> <https://apps.cbpp.org/4-3-19hous/PDF/4-3-19hous-factsheet-us.pdf>

<sup>80</sup> See Justice in Aging, Supporting Older Americans' Basic Needs: Health Care, Income, Housing and Food (Apr. 2018). [www.justiceinaging.org/wp-content/uploads/2018/04/Supporting-Older-Americans%E2%80%99-Basic-Needs-Health-Care-Income-Housing-and-Food.pdf](http://www.justiceinaging.org/wp-content/uploads/2018/04/Supporting-Older-Americans%E2%80%99-Basic-Needs-Health-Care-Income-Housing-and-Food.pdf)

<sup>81</sup> Housing and Community Development Act of 1980: Verification of Eligible Status, 84 Fed. Reg. 20,589, 20,592 (proposed May 10, 2019) (to be codified at 24 C.F.R. part 5).

<sup>82</sup> Donna Jafe, For Older Voters, Getting the Right ID Can Be Especially Tough, NPR: ALL THINGS CONSIDERED (Sept. 7, 2018). <https://www.npr.org/2018/09/07/644648955/for-older-voters-getting-the-right-id-can-be-especially-tough>.

<sup>83</sup> Debra L. Brucker, Veronica Helms, and Teresa Souza, "Health and Health Services Access Among Adults With Disabilities Who Receive Federal Housing Assistance," Housing Policy Debate, Vol. 28 (August 29, 2017). <https://www.tandfonline.com/doi/full/10.1080/10511482.2017.1357048>

<sup>84</sup> L. Kraus et al., "2018 Disability Statistics Annual Report," 9 (2019). [https://disabilitycompendium.org/sites/default/files/user-uploads/Annual\\_Report\\_2018\\_Accessible\\_AdobeReaderFriendly.pdf](https://disabilitycompendium.org/sites/default/files/user-uploads/Annual_Report_2018_Accessible_AdobeReaderFriendly.pdf) ("In 2017, the poverty rate of individuals with disabilities (ages 18-64) was 29.6 percent. In contrast, in 2017 the poverty rate of individuals without disabilities was estimated at 13.2 percent.")

<sup>85</sup> National Fair Housing Alliance, "Making Every Neighborhood A Place of Opportunity: 2018 Fair Housing Trends Report," 52 (2018) at <https://nationalfairhousing.org/wp-content/uploads/2018/04/NFHA-2018-Fair-Housing->

barriers in complying with the documentation requirements that the proposed rule will impose, thereby increasing their risk of displacement notwithstanding their previously established eligibility. Many disabled people grapple with mobility issues, do not drive, and are oftentimes unable to access public transportation. They will thus encounter unique obstacles with obtaining the necessary paperwork from governmental offices. Indeed, persons with disabilities are less likely than non-disabled persons to have state-issued identification.<sup>86</sup> Because persons with disabilities have limited incomes as a direct result of physical and/or mental health challenges, they will also encounter obstacles with affording the high fees associated with generating or replacing lost documentation. For example, we recently assisted a client with disabilities in obtaining birth certificates for herself and her two children; we had to procure financial assistance so she could cover the costs and it took over two months with help from service connectors to get the documentation from three separate counties. Termination of assistance under the proposed rule could put people with few options at risk, with tremendous cost to their health, earning potential, and well-being and cause other significant harm.

## **V. Immigrant survivors of gender-based violence.**

Survivors come to Bay Area Legal Aid seeking help with a myriad of legal issues, including housing, domestic violence restraining orders, family law, consumer law, health access, access to public benefits, and immigration. Many of the survivors we help are immigrants of varying status and many are people of color. In 2018, we closed 2,040 cases in which clients identified as a survivor of domestic violence, sexual assault, or human trafficking. Out of these cases, 516 were on behalf of non-citizens. Due to our work with survivors, we are aware of the impact of access to housing on their safety, health, welfare, and well-being, as well as, on their children.

Certain immigrant survivors of gender-based violence such as human trafficking, sexual assault, and domestic violence will be severely and disproportionately harmed by HUD's proposed rule. Traumatized and vulnerable, survivors are also often indigent and face numerous challenges to their basic well-being. Ready access to safe, affordable housing is thus critical to their ability to flee abusive homes. For some, their basic survival hangs in the balance.

Affordable housing is essential to increasing survivors' chances of escape, recovery, and prevention of future abuse.<sup>87</sup> Strikingly, domestic violence, including sexual abuse, is reported as the acute cause of homelessness among 22% to 57% of all homeless women.<sup>88</sup> For survivors,

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[Trends-Report\\_4-30-18.pdf](#) (“As has been the case in past years, the majority of complaints from 2017 involved housing discrimination against people with disabilities.”)

<sup>86</sup> s.e. smith & Rebecca Cokley, Reforming Elections Without Excluding Disabled Voters, Ctr. for Am. Progress (Mar. 29, 2019), <https://www.americanprogress.org/issues/disability/news/2019/03/28/468019/reforming-elections-without-excluding-disabled-voters/>.

<sup>87</sup> *Preventing Intimate Partner Violence Across the Lifespan: A Technical Package of Programs, Policies, and Practices*, Centers for Disease Control and Prevention (2017) <https://www.cdc.gov/violenceprevention/pdf/ipv-technicalpackages.pdf>; see also Breiding, M.J., Chen J., & Black, M.C. (2014). *Intimate Partner Violence in the United States — 2010*. Atlanta, GA: National Center for Injury Prevention and Control, Centers for Disease Control and Prevention, [https://www.cdc.gov/violenceprevention/pdf/cdc\\_nisvs\\_ipv\\_report\\_2013\\_v17\\_single\\_a.pdf](https://www.cdc.gov/violenceprevention/pdf/cdc_nisvs_ipv_report_2013_v17_single_a.pdf).

<sup>88</sup> Wilder Research Center, Homelessness in Minnesota, 2003 (2004) <https://www.wilder.org/wilder-research/research-library/homelessness-minnesota-2003-study>; Center for Impact Research, Pathways to and from Homelessness: Women and Children in Chicago Shelters (2004), <http://advocatesforadolescentmothers.com/wp->

access to confidential shelters is at best a temporary solution. Shelters are few and come with restrictions. Often times, demand exceeds the number of spaces available at a shelter. Securing stable housing is often one of the biggest hurdles for a survivor to overcome in fleeing their abuser. Housing can be determinative as to whether a survivor can escape an abusive intimate partner in many cases. At Bay Area Legal Aid, we have witnessed how the availability of subsidized housing can make a critical difference in a survivor's ability to escape abuse.

Our survivor clients' ability to afford market-rate housing is often limited by their abusers. Violent perpetrators are well-aware of the link between a victim's financial independence and her access to safety. Three-quarters of women report staying in an abusive relationship due to economic barriers.<sup>89</sup> Financial abuse is extremely common in intimate partner violence relationships with between 94% and 99% of survivors reporting experiencing financial abuse.<sup>90</sup> Abusers will keep financial information from survivors, ruin credit, interfere with the survivor's employment through threats and tactics to hinder the survivor from going to work, and more.<sup>91</sup> Getting financial support from the abuser can prove to be futile. California Family Law courts allow married parties to seek spousal support. If the survivor has a child or children in common with the abuser, they may seek child support. However, it's been our experience that many abusers do not pay the support they have been court-ordered to pay. Some quit their jobs voluntarily so that they don't have to pay. Survivors may file contempt proceedings in court to obligate their abusers to pay but this is time-consuming and not always effective in getting the money they need to secure housing for themselves and their children. Furthermore, seeking such financial support from the abuser is not always the safest option as this may prove to be the trigger of further physical abuse. One of our clients for example, was physically attacked by her abuser on the day of her spousal support hearing right outside the courthouse. Having access to housing assistance enables survivors to be able to afford to leave abusive relationships and keep themselves and their families safe and housed.

We have seen in our practice how the availability of subsidized housing opportunities empowers immigrant survivors of gender-based violence to permanently escape domestic abuse. One of our clients, an undocumented mother of two children, fled her abuser and was able to secure a Section 8 voucher and safe housing for her U.S. citizen children. As she no longer had to depend on her abuser for shelter, she was better able to focus on collaborating with us to secure U Visa relief. Our client complied with the U Visa requirements and was eventually able to obtain legal

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[content/uploads/homelessnessreport.pdf](#); Institute for Children & Poverty, *The Hidden Migration: Why New York City Shelters Are Overflowing with Families* (2004); Homes for the Homeless & Institute for Children & Poverty, *Ten Cities 1997-1998: A Snapshot of Family Homelessness Across America* (1998), <https://files.eric.ed.gov/fulltext/ED424338.pdf>; See also [http://www.nsvrc.org/sites/default/files/NSVRC\\_Publications\\_Reports\\_Housing-and-sexual-violence-overview-of-national-survey.pdf](http://www.nsvrc.org/sites/default/files/NSVRC_Publications_Reports_Housing-and-sexual-violence-overview-of-national-survey.pdf).

<sup>89</sup> The Mary Kay Foundation. (2012). 2012 Mary Kay Truth About Abuse Survey Report. <http://content2.marykayintouch.com/Public/MKACF/Documents/2012survey.pdf>.

<sup>90</sup> See, e.g., Postmus, J. L., Plummer, S. B., McMahon, S., Murshid, N. S., & and Mi Sung Kim, M. S. (2012). *Understanding economic abuse in the lives of survivors*, JOURNAL OF INTERPERSONAL VIOLENCE, 27(3),411-430, [https://pdfs.semanticscholar.org/1d39/80ba5c87bde12b4c7c6caa51d418b615339e.pdf?\\_ga=2.201378707.30892259.1562627311-460765426.1562627311](https://pdfs.semanticscholar.org/1d39/80ba5c87bde12b4c7c6caa51d418b615339e.pdf?_ga=2.201378707.30892259.1562627311-460765426.1562627311); Adams, A., Sullivan, C., Bybee, D., & Greeson, M. (2008), *Development of the scale of economic abuse*, VIOLENCE AGAINST WOMEN, 13, 563-588, <http://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.894.9371&rep=rep1&type=pdf>.

<sup>91</sup> *Id.*

permanent residency in this country. It is clear that, had our client and her family not been allowed to retain their federal housing subsidy under the mixed-status rules, they would have been forced to return to an abusive and dangerous living situation.

The current mixed-status household rules allow eligible family members to reside in the same home as survivors that may not qualify for federal housing subsidies. This is critical for our survivor clients, because their circumstances often require them to rely on subsidized housing to be able to afford shelter for them and their children. By contrast, the proposed rule prohibits families from residing together in subsidized housing unless all members of the household establish eligibility for the subsidy. If the proposed rule goes into effect, ineligible survivors and their eligible children who are trying to escape violent homes will be trapped in a false “choice” – homelessness or remaining with an abuser. Those already living in subsidized housing who are evicted and forced to return to a violent home will face an even greater risk to their safety. It is commonly known that the danger to a victim actually increases once she escapes, with one estimate noting a 75% increase in violence for at least two years following an escape.<sup>92</sup>

Maintaining housing stability is also crucial for children who have been exposed to domestic violence to feel safe, heal, and strengthen resilience. Disrupting the lives of children who have been witnesses or subjected to abuse by forcing them to leave their homes will lead to long-term harm to their development, recovery, health, and academic and social success.<sup>93</sup> For example, one of our U-Visa clients lives in subsidized housing and receives mixed-status prorated rental assistance for her two U.S. citizen children. Obtaining this housing subsidy was critical to protect her and her children from her abuser who had kept her imprisoned at home and had repeatedly sexually assaulted her when she was living with him. Our client’s autistic son is now being raised in a home that is free from abuse where his mother can focus on meeting his special needs so that he can thrive.

Current and future survivors who are eligible for subsidized housing will be vulnerable to eviction under the proposed rule. The rule requires proof of immigration status and submitting such evidence will be challenging for those whose abusers have destroyed or withheld their documents from them as a tool of abuse. In several of our cases, abusers have withheld or even destroyed the survivors work authorization and other proof of legal status. One particular survivor was able to retrieve her work permit which her abuser had stolen from her purse only after she obtained a court-order mandating the return of her work authorization.

At Bay Area Legal Aid, we work very closely with other domestic violence prevention programs to adequately serve and support survivors. With lack of housing being one of the greatest barriers to accessing safety, many domestic violence prevention programs rely on housing subsidies to

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<sup>92</sup> The Center for Relationship Abuse Awareness, *Barriers to Leaving an Abusive Relationship* (last visited 7/8/19) <http://stoprelationshipabuse.org/educated/barriers-to-leaving-an-abusive-relationship/>; see also Liam Kelly, *Domestic Abuse ‘You’re Most at Risk of Being Killed When You Try to Leave’*, THE GUARDIAN (Dec. 10, 2014), <https://www.theguardian.com/society-professionals/2014/dec/10/domestic-abuse-risk-trying-leave-housing-community>; Jerry Mitchell, *Most Dangerous Time for Battered Women? When They Leave*, CLARION LEDGER (Jan. 28, 2017), <https://www.clarionledger.com/story/news/2017/01/28/most-dangerous-time-for-battered-women-is-when-they-leave-jerry-mitchell/96955552/>.

<sup>93</sup> Rollins, C., Billhardt, K., & Olsen, L. (2013). Housing: Safety, Stability, and Dignity for Survivors of Domestic Violence. *Domestic Violence Housing First*.

meet housing needs that allow survivors and their families to escape and overcome abuse. This rule, if adopted, would have a negative impact on these providers as they would be unable to place survivors in such housing. Furthermore, stabilizing our clients' housing is critical for us to be able to effectuate our legal advocacy.

## **VI. Conclusion**

Not only do HUD's proposed changes to the mixed-status rules contravene federal statutes, they are also bad policy. Prohibiting mixed-status families from accessing assisted or public housing will displace thousands of otherwise eligible program participants and will do nothing to alleviate the current subsidized housing waitlist crisis. The proposed rule will compromise the health and safety of vulnerable populations - such as children, the elderly, and persons with disabilities - whose dependence on federal housing subsidies is critical to their long-term wellbeing. Moreover, HUD's proposal will lead to even more barriers for survivors of gender-based violence and their families to escape abuse and seek safety, trapping them in abusive situations or causing them to face destitution and homelessness. We thus respectfully urge HUD to immediately withdraw its current proposal, and that it instead dedicate its efforts to advancing policies that concretely expand—rather than undermine—equal and affordable housing opportunities.

Respectfully submitted,



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## ATTACHMENTS

Please find attached three studies cited in our Bay Area Legal Aid Comment Letter:

1. Marybeth Shinn, Jessica Gibbons- Benton, & Scott R. Brown, Poverty, *Homelessness, and Family Break-Up*, CHILD WELFARE, 94(1) (2015).
2. United States Interagency Council on Homelessness, *Supplemental Document to the Federal Strategic Plan to Prevent and End Homelessness: June 2010: Homelessness Among Youth*, Washington, D.C. (2010).
3. Arshi Shaikh & Hiren Rawal, *Interconnections among Homelessness, Family Separation, and Mental Health: Implications for Multi-Sectoral Social Services*, JOURNAL OF SOCIAL SERVICE RESEARCH, 45:4 (2018).

# Poverty, Homelessness, and Family Break-Up

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This study examines the extent and correlates of family separations in families experiencing homelessness. Of 2,307 parents recruited in family shelters across 12 sites, one-tenth were separated from partners and one-quarter from one or more children. Additional separations before and after shelter entry and reasons, from parents' perspectives, were documented in qualitative interviews with a subsample of 80 parents. Separations were associated with economic hardship, shelter conditions, and family characteristics.

***Acknowledgements:** This study was supported by the National Institute of Child and Human Development, grant #5R01HD066082. Survey data collection was funded by contract C-CHI-00943, Task Orders T-0001 and T-0003 from the Department of Housing and Urban Development to Abt Associates. We thank Abt Associates, Inc., Emily Holt and Meghan Henry for conducting the interviews and Lindsay S. Mayberry and Chase Darmstadter for contributions to coding.*

Poverty and homelessness are associated with the break-up of families. A number of studies have documented that children in families who experience homelessness frequently become separated from their parents. In a national sample in 1996, Burt and colleagues (1999) found that three-fifths of women served by homeless programs had children under the age of 18, but only 65% of the mothers lived with any of their children. Park and colleagues (2004) found that 24% of more than 8,000 children who entered shelter with a parent for the first time in New York City in 1996 received child welfare services within five years of shelter entry—three-quarters of them after the family became homeless. Many smaller, local studies document associations of housing problems and homelessness with elevated rates of foster care placements and far higher rates of informal child separations unknown to child welfare authorities (for reviews, see Barrow & Lawinski, 2009; Courtney, McMurty, & Zinn, 2004).

Fewer studies have sought to explain these separations. In studies of the general population, poverty is related to child maltreatment, especially neglect (Sedlak et al., 2010) and to “substandard” parenting (Berger, 2007). Among families experiencing homelessness, Park and colleagues (2004) found that recurrent and longer shelter episodes and domestic violence predicted child welfare services. They suggest that families in shelters are subject to stress and lack of privacy, and also heightened scrutiny: a “fishbowl effect” may lead staff to report to child protective services. Similarly, McDaniel and Slack (2005) suggest that life events, such as a move, may make low-income parents more visible, leading to protective service reports. Cowal and colleagues (2002) compared mothers who entered shelter with continuously housed mothers using public assistance and found that drug abuse, domestic violence, and any institutional placement of the mother predicted separation for both groups, but homelessness was by far the strongest predictor. Barrow and Lawinsky (2009) found that the same factors, along with children’s needs, were important in a sample of mothers

experiencing homelessness, but described precarious housing as “a constant backdrop.” In the face of crises that came “in twos and threes,” mothers negotiated with fathers, maternal and paternal kin, and agencies to find “better choices among troubling alternatives” (pp. 166-167) for themselves and their children.

The current mixed-methods study uses survey data to document the extent of child separations in a large multi-site sample of 2,307 families recruited in homeless shelters, and uses both quantitative and qualitative data to examine explanatory factors posited in the literature. In particular in the survey data, we examine associations of separations with the parent’s prior homelessness, substance abuse, domestic violence, felony conviction (a proxy for institutional placement), and foster care placement in childhood, along with parent and child demographic characteristics. The quantitative data also allow examination of the extent to which separations vary by site and shelter, suggesting policy differences in the homeless service and child welfare systems that may affect separations. Qualitative interviews with a subsample of 80 families elucidate from parents’ perspectives how poverty, housing problems, and the homeless service system contribute to separations.

Although our primary focus is on child separation, we additionally examine the extent to which partners are separated from each other. Families experiencing homelessness are often headed by single parents (Rog & Buckner, 2007), but this is partly a consequence of shelter and housing program policies that exclude men (U.S. Conference of Mayors, 2006). Thus we examine how separations of parents from partners they consider a part of their family vary by site and shelter, and reasons families give in qualitative interviews.

## **Methods**

### ***Participants***

The Family Options study enrolled 2,307 families with children 15 years of age and under who had spent at least one week in one of 57 emergency

shelters in 12 sites,<sup>1</sup> drawn from all regions of the United States and varying housing and labor markets, from September 2010 to January 2012. Families were recruited into an experiment in which they received priority access to housing and service interventions. Very few families ( $n = 13$ ) declined to participate, although 183 who failed to pass eligibility screening for available interventions were not enrolled. (Common reasons for exclusion included insufficient income or lack of employment, family composition, size of available units, poor credit history, criminal convictions, and lack of sobriety.) We interviewed one adult at study enrollment, prior to random assignment, giving preference to mothers in two-adult families, because when parents are separated, children more frequently stay with the mother.

The adult respondents were predominantly female (91.6%), with a median age of 29. Over a quarter (27.4%) had a spouse or partner with them in family shelter. A plurality (43.7%) had one child with them in shelter but 11.1% had four or more. In half of the families (49.9%), at least one child was under age 3. Study families were 41% African American, 21% white, non-Hispanic, 20% Hispanic (all races), 7% Asian/Pacific Islander, and 11% mixed or other (with Hispanics excluded from all remaining categories). Families were deeply poor—median annual household income was \$7,440—and many came from poverty: during childhood, 15.9% of respondents had been homeless and 27.1% had lived in foster care, a group home, or an institution. Poverty was also longstanding: 62.8% had experienced a prior episode of homelessness and 84.6% had been doubled up (living in the same unit with another family) as an adult because they could not pay the rent (for details see Gubits, Spellman, Dunton, Brown, & Wood, 2013).

We conducted semi-structured qualitative interviews with a non-random subsample of 80 families—77 mothers and 3 fathers—from

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<sup>1</sup> Sites were Alameda County, California – Oakland, Berkeley, Haywood, Alameda; Atlanta Georgia; Baltimore, Maryland; Boston, Massachusetts; Connecticut – New Haven, Bridgeport, Norwalk, Stamford; Denver, Colorado; Honolulu, Hawaii; Kansas City, Missouri; Louisville, Kentucky; Minneapolis, Minnesota; Phoenix, Arizona; and Salt Lake City, Utah.

four geographically dispersed sites (Alameda County, Connecticut, Kansas City, and Phoenix) an average of 6.4 months after random assignment. Demographic characteristics of the subsample were similar to those of the full sample (for detail, see Mayberry, Shinn, Benton, & Wise, 2014).

### *Measures*

The adult respondent (in the full sample) reported on all family members who were with her in shelter and also about spouses, partners, and minor children “who are part of the family but are not living with you right now in [shelter name].” Additional variables are shown in Table 1 and described in detail in Gubits and colleagues (2015).

The qualitative interviews covered family composition, housing decisions, family routines and rituals, and social supports. The family composition section that is the focus here asked the respondent about separations from children (for any reason) and from partners (if associated with housing or housing programs). Additional questions probed for reasons for separation and how it unfolded, how long the respondent expected the separation to last, whether the respondent had reunified with the child and on what that depended, and whether the respondent felt the separation was the best option for the child. Respondents who had never separated from a child were asked whether there was ever a time when they had considered doing so, and why. Interviews averaged about an hour, with interviews where respondents reported separations taking longer than others. Interviews were recorded and transcribed.

### *Analyses*

Quantitative predictors of child separation (listed in Table 1) were analyzed in SAS using logistic regression at the level of the child, with standard errors corrected for clustering of children within families. Because we were interested in separations from partners only if they were related to housing, we did not examine

individual level predictors, but tested only whether the proportion of families with a spouse or partner living elsewhere at the time of study enrollment differed by site and shelter. Analyses for shelter included the 42 shelters with at least 20 enrollments.

Qualitative interview transcripts were analyzed using NVivo9. Research team members each read a subset of the interviews. The team then developed a thematic coding scheme inductively for each section of the interview. Next, two analysts refined the coding scheme for a specific section of the interview and examined inter-rater reliability. Reliability for existence of and reasons for separation for children (across 32 interviews) and partners (across 20 interviews) were kappa = .85 and .91 respectively. Discrepancies were resolved by consensus. One analyst completed the remaining coding, but both discussed difficult-to-classify cases. We coded all instances of separation of the respondent from children, including normative separations (e.g. due to custody after divorce). For partner separations, we considered only separations related to housing and housing programs.

## Results

The quantitative interviews provide data on the extent of separations among families experiencing homelessness. In the full sample of families who had spent seven days in shelter, 10.1% of adult respondents reported that a spouse or partner was living elsewhere. Nearly a quarter (23.9%) had a minor child who was not in the shelter with the family (living with other relatives, friends, in foster care, or in other living situations). Only 0.7% of respondents reported that a child was in foster care. Rates of separation in the quantitative data for the qualitative subsample of 80 were similar (10% for partners, 25% for children).

The quantitative interviews also allow for the identification of adult and child characteristics associated with child separations. Table 1 shows the results of a logistic regression predicting child separation. Child age (categorical variable) was strongly associated with the likelihood of separation. A third (33.7%) of children age 13 to 17 were separated compared to 22.2% of children age 8 to 12, 13.4%

of children age 3 to 7, and only 4.5% of children age 0 to 2. There was little variation in separations by child gender, with 15.5% of girls and 16.7% of boys being separated, and no interaction between child age and gender ( $p=.86$ ). Younger parents and those with more children, previous experiences of homelessness, and prior felony convictions were more likely to be separated from their children. Race and income (categorical variables) also mattered. Households that reported less than \$5,000 in annual income had 2.6 times higher odds of having a separated child compared to households with incomes of \$25,000 or more. White non-Hispanic respondents had 1.5 times the odds of having a separated child compared to black non-Hispanic respondents, with no differences between black non-Hispanics and other groups. Interestingly, alcohol and drug abuse, domestic violence at any time in adulthood, and having been in foster care as a child were not predictive of separations.

Rates of child separations ranged across sites from 9% to 24% of children (leading to a significant site effect controlling for parent and child characteristics). Separations were most common (exceeding 20% of children, 39% of families) in Salt Lake City, and Baltimore, and least common (below 10% of children, 13% of families) in Boston and Connecticut. Child separation rates differed by shelter ( $F(1, 41) = 4262.90$ ,  $p < .0001$ ) without other controls. Partner separations were also associated with site ( $F(1, 11) = 70.60$ ,  $p < .0001$ ) and shelter ( $F(1, 41) = 119.53$ ,  $p < .0001$ ), with separations highest in Baltimore (24% of all families; 88% of those with a spouse or partner) and lowest in Honolulu (4% of all families and 5% of those with a spouse or partner). Spousal (but not child) separations were generally higher in the East than in the Midwest or West.

The qualitative interviews help to explain the circumstances of these separations and others that occurred before and after the survey and how separations were influenced by poverty, housing, and housing programs. Of the 80 participants, 43 (54%) reported 57 instances in which they had been separated from a total of 78 minor children; if a family separated from two or more children at the same time, under

**Table 1. Logistic regression predicting child separations from parent and family characteristics (N = 5,165 children)**

Variable	OR	95% CI
Male child	1.07	[0.90, 1.26]
Number of children in household	1.35	[1.24, 1.46] ***
Parent age	0.93	[0.92, 0.95] ***
Single parent	0.83	[0.64, 1.06]
Previously homeless	1.43	[1.11, 1.83] **
Alcohol abuse	1.13	[0.81, 1.57]
Drug abuse	1.27	[0.93, 1.73]
Foster or institutional care in childhood	1.13	[0.87, 1.46]
Prior felony conviction	1.84	[1.31, 2.58] ***
Adult domestic violence experience	0.90	[0.70, 1.16]
<i>Categorical variables</i>	<u>df</u>	<u>Chi-square</u>
Child age group	3	248.99 ***
Household income category	5	23.85 ***
Race/Ethnicity	4	11.29 *
Site	11	22.57 *

Note. OR = odds ratio; CI = confidence interval. 231 observations excluded due to missing values. Chi-square indicates joint significance of categorical variables in the full model. Standard errors adjusted for clustering of children in families.

\* $p < .05$ , \*\* $p < .01$ , \*\*\* $p < .001$ .

the same circumstances, we considered this one instance. If a family separated from the same child on two occasions, we coded each instance separately. Most separations occurred during periods of homelessness or housing instability.

### *Reasons for Child Separations*

Table 2 displays reasons for separation coded into eight categories with combinations of reasons coded into the uppermost category (row) on the list, because we deemed this more central. Thus, for example, if a respondent attributed her inability to feed her children adequately to lack of money for food, we coded this as hardship rather than inability

**Table 2. Reasons for separation of parent from minor children (with multiple reasons for a single instance counted in uppermost category on the list)**

Code	Definition	Instances of Separation	Families Affected	Children Affected
Shelter	Issues related to entries or living in shelter, including conditions of shelter, shelter rules that separate families, not wanting the child to be exposed to shelter.	9	9	13
Arrest	Respondent was arrested.	8	6	10
Protective Services	Protective Services removed child for reason other than parental arrest.	6	3	10
Hardship	Respondent chose separation due to poverty, housing instability, unemployment, hunger, or inability to provide for child.	15	15	20
Inability to parent to own or family's standards, reasons other than hardship	Respondent was unable to parent the child appropriately in her own judgment, or that of family members who intervened. Includes respondent's substance abuse.	5	5	6
Child behavior	Child's behavior was dangerous to him/herself or others, or otherwise unacceptable, and respondent was unable to address the behavior.	3	3	3
Child safety	Respondent chose separation due to unsafe living situation. Includes domestic and neighborhood violence.	5	4	6
Normative other parent or relative custody	Other parent or family member has custody of child by respondent or child choice or custody decision, unrelated to issues above.	6	6	9
Total	A child or family could have multiple instances	57	43	76

to parent to own or family standards, or if protective services removed a child upon a respondent's arrest, we coded this under arrest rather than protective services. Most of the children stayed with their other parent or another relative during the separations, but we coded these separations as normative (six families and instances) only if they were unrelated to the other reasons on the list. Half of the non-normative separations (24 families and instances) were related to economic and housing hardship, or shelter.

### *Hardship*

Economic hardship unrelated to shelter was the most common reason for separations (15 families and instances). In most cases, the family was experiencing housing instability, living in motels or doubled up with others because they could not afford their own place, or moving from place to place. Respondents described wanting their child to have stability and a sense of normalcy. In four instances, parents were unable to provide the children's basic needs.

At the time I was pregnant, and we were living in motels. I found myself getting broke. We were eating fast foods. I got paid from my job and I called their dad, and I said, "[Ex-Partner], I love my boys, I know you love them too, but I need help right now." We met and he took the boys ... I didn't have a refrigerator or nothing like that, so I don't want my boys to ... it was beginning to be too much.

### *Shelter*

Nine families separated from children either upon shelter entry or during a shelter stay (sometimes one occurring before the study), typically so that children could avoid exposure to shelter conditions:

... it took its toll on my children. They were going to sleep in class because of the babies waking up in the middle of the night at the shelter.

I was letting her grandmother take her out of the shelter because she was losing weight and she was getting bad. She hearty but she was getting bad like the other kids.

In two cases, the shelter could not accommodate all minor children. Nor would shelters typically take extended families. When a three-generational family was evicted, the mother and grandmother each took a child so both could go to family shelters. In another instance (not in Table 2), an adult child, age 20, was excluded from a shelter but later rejoined his mother and siblings in housing.

### *Parenting or Child Safety*

Several categories of reasons for separation reflect the parent's inability to care adequately for the child or to maintain a safe environment. Six respondents (eight instances) were arrested (all before study entry), and five (five instances) were unable to parent according to their own standards, or those of their family, most commonly due to substance abuse. Several of these parents sought treatment, and some were reunited with children afterwards. In three cases, relatives took the child from the parent because of the parent's youth or substance abuse. Four respondents (five instances) cited child safety due to the environment inside or outside of the household. Typically, separations coded under Safety were related to hardship and housing instability but safety was the proximal issue. For example, one respondent had to move somewhere she deemed unsafe after an eviction; another left an unsafe area and moved in with a violent boyfriend. Three families (six instances) were separated by a protective services agency due to parental substance abuse and neglect. In all but two other instances, both involving arrest, the respondent arranged for family members to take the child without formal agency involvement.

### *Child Behavior*

In three families (three instances), separations began because of children's behavior. In two cases, children reacted badly to a move away

from relatives, and the respondent sent them to those relatives; in the third, the child was picked up by police and sent, briefly, to a mental health facility.

### ***Best Option***

Although many parents who were separated from a child described a sense of loss and reported that the child missed them, 34 of the 43 parents considered the painful decision to be the best option among difficult choices because the child was stable and better provided for. Separations enabled the child to remain in a good school or to develop a bond with extended family.

As much as it hurt me to be separated from my daughter, you know, sometimes you have to make sacrifices. You have to put them first. You have to think about what's best for them for that time until things get better or you figure something out.

Other children had negative experiences, including one who was molested and another who was physically abused during the separation.

### ***No Separations from Children***

Among parents who had not been separated from children, 13 of 37 had considered a separation, typically for reasons associated with hardship or shelter:

Maybe before we got into the shelter, because it was hard to get into that shelter... So instead of taking my kids to a park, there was numerous shelters I had called. And there was one shelter where the woman said, "we can take your kids for the night so they don't have to sleep outside. We'll take them, but we can't take you." And I was like, well, if I have to sleep in a park, my kids are definitely going to go there. 'Cause I don't want them to do it. But—so yeah. I considered it then, but it didn't happen. Thank God!

### *Partner Separations*

Of the 80 respondents, 12 (14 instances) had been separated from a partner for housing-related reasons. Half of the partner separations had to do with rules of shelters or housing programs that excluded men, unmarried couples, or people with criminal convictions. Although respondents felt they had no housing options that would allow partners to stay together, many of them described the resulting strain:

[T]hen I had to move all the stuff out, and there wasn't no help at the time, because it was just a shelter for women and children. He wasn't with me ... so it was like – if he was here, it would be so much easier, but they didn't allow that.

Two respondents left doubled-up situations that had accommodated partners to obtain housing that they deemed better for themselves and their children. Two others moved into doubled-up situations that required separating from partners. One of these families was living in their car:

And it was just better for him [partner] to send me back to my family for me to get a support down there than it was for me to stay here. Because everybody was telling us that Children and Youth would come take my daughter if they found us in a car and all this. So we just wasn't willing to risk that. So he just—we just sold the furniture and stuff that we had, and he bought us tickets and sent us back home.

Most respondents who experienced a housing-related separation from their partners reported negative impacts on their children.

...when [partner] did move in with us the baby was kind of like he knew who he was but it was kind of like hmm, I haven't seen this guy in a while. Like where'd you come from? .... He didn't really know who [partner] was and then he finally figured, oh yeah, this is my dad so he's supposed to be around me.

### *Reunification with Children and Partners*

All but five respondents anticipated that the separations from their children would be temporary. However, 20 of 57 separations (35%) lasted longer than the parent anticipated, often because it took her longer than expected to secure stable housing or to become financially able to care for the children.

Of the 57 incidences of separation from children, 34 had ended in reunification at the time of the qualitative interview. Respondents indicated that securing adequate housing permitted 14 of these reunifications. Nine parents reported that ongoing separations would continue until the parents secured housing. These parents were living in shelter or transitional housing (five), doubled up with other households in the same apartment (three), or in a subsidized apartment that was too small to accommodate all children (one). Thus the ending of nearly half of all separations (23/57) depended on housing.

Similarly, nine of the 14 separations from a partner had ended in reunification at the time of the qualitative interview, typically because the respondent or the partner was able to secure housing that could accommodate the entire family. Reunification in three additional cases depended on housing.

No parent indicated that shelters or other housing services attempted to reunite them with their families. Rather, shelter and housing programs tended to consider only members present with the respondent in evaluating housing needs, resulting in assignment to places too small for the full family. Respondents also reported that staff in shelters and transitional housing threatened to involve protective services if parents did not comply with shelter rules (Mayberry et al., 2014), and this led to one removal (where the parent violated a shelter rule about substance use.)

### **Discussion**

As in other studies in the literature, this study shows that separations from children are rampant in families who experience homelessness. In our large 12-site sample, nearly a quarter of families who had spent

a week or more in shelter were living apart from one or more of their children, although fewer than one percent had a child in foster care. Including separations at other times, over half of the qualitative subsample had been separated. Other studies have found that both separations and foster care placements often increase in the months following shelter entry (Cowal et al., 2002; Park et al., 2004), so the numbers may continue to grow.

Family demographic characteristics were associated with the likelihood of separations. Older children are much more likely to be separated from their families, with children age 13 to 17 being at particularly high risk. Mothers may be more likely to keep younger children with them, with older children more likely to stay with other relatives so that they are not exposed to shelter conditions or can maintain continuity in schooling. Despite some shelters having policies excluding older male children, no evidence of an interaction effect between age and gender was found. Larger households also faced greater difficulty staying intact or reunifying, perhaps in part due to constraints on unit size. White families are likely to have more resources to stay out of shelter than families of color; those who nonetheless become homeless may be more troubled, leading to higher rate of separations.

Both the quantitative and qualitative data point to the importance of extremely low incomes and resulting hardship in tearing families apart. Parents faced agonizing choices between keeping children with them and protecting them from shelter conditions or providing for their welfare. As in the study by Barrow and Lawinski (2009), most separations involved parental agency in difficult circumstances, and most separations were arranged informally between parents and other relatives.

Parental behavior also mattered. Arrests and felony convictions were associated with separations in the qualitative and quantitative data respectively. Substance abuse, perhaps surprisingly given previous studies, figured only in the qualitative data, and having experienced domestic violence as an adult was not associated with separations, perhaps because of the long time frame. Relatives sometimes intervened when they thought the respondent was not parenting appropriately.

Local policies also influenced parental options and choices, as evidenced by the fact that rates of separation varied substantially by site and shelter. Partner separations contributed to, but did not fully explain, the lower numbers of two-parent families in the East (as has been found in other studies, c.f. Rog & Buckner, 2007). Although some shelter staff threatened to call protective services in order to induce compliance with rules and did so in one case, the additional visibility of parenting under the watchful eyes of service providers does not explain informal separations. Children were rarely taken into foster care.

This study is the first to document the extent to which poverty and homelessness lead partners to separate from one another. One in ten parents had a partner living elsewhere while the family was in shelter. The quantitative and qualitative data clearly implicate shelters in separations of partners, although the fact that over a quarter of families in shelter had two parents suggests improvements over past years in shelters' ability to accommodate at least nuclear families. Housing voucher programs also separate parents where one has a criminal record. The interviews show that the forced separation of fathers from their families is hard on mothers and children.

## **Implications for Research and Policy**

We recruited families who had spent at least a week in shelter, and it is possible that families who can resolve homelessness quickly would have lower rates of separation than the families surveyed here. Nevertheless, results are troubling with implications for both research and policy. With respect to research, the fact that studies of children who experience homelessness exclude those who are separated from their parents means that samples are seriously biased. Whether child separations reflect hardship, parental behavior, or child behavior, children who are separated are likely to be faring worse than children who remain with their families. Estimates of effects of homelessness on children may be underestimates. Shelter policies excluding men may have led researchers to exaggerate the role of single parenthood in homelessness.

With respect to policy, programs that work with poor families, from income support and housing programs to shelters and transitional housing programs to correctional institutions to substance abuse treatment programs, should pay more attention to preserving families. Separations are hard on both parents and children, and separation from parents in the family of origin is a predictor of future homelessness in adults (Rog & Buckner, 2007).

Family preservation may conflict with other policy goals. For example, in a congregate shelter or transitional housing program, one family's husband and father may be seen as a potential danger to the next family's child, and public housing rules designed to preserve the safety of the community by excluding criminals separate parents from their families. Welfare time limits may encourage adults to work, but lead to hardship, hunger, and ultimately separations for families. Prisons are designed to isolate and punish inmates, but the separation also punishes children and partners. Naming and quantifying the problem at least allows it to be taken into consideration in policy choices. Scatter-site homeless and housing programs, alternative sentencing, and substance abuse treatment programs that permit children to stay with parents may be able to reduce family separations. Housing programs should take family members living elsewhere into account in assigning units, to permit reunification. Child welfare authorities in particular should serve as advocates for minimizing separations of children from parents, and reunification when separations cannot be avoided.

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## USICH BRIEFING PAPER

### PREFACE:

Five federal workgroups were convened to initiate development of the federal plan. At their first meeting, each workgroup was presented with an overview of the literature. These were prepared and presented by Carol Wilkins and Janice Elliott, under contract with USICH.

## Homelessness among Youth

### *Scope of the Problem*

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1. Reliable and consistent estimates of the scope of youth homelessness are lacking. Estimates vary depending on definitions of homelessness (including youth who are staying in unstable, temporary arrangements or couch-surfing; homeless unaccompanied or as members of homeless families) and age range (12-18, 12-21, or 12-24).<sup>1</sup> Little research has examined patterns of youth homelessness and factors associated with extended or repeated episodes of homelessness

#### **Estimates of youth experiencing homelessness:**

- Estimates are that 8% of youth between ages 13 and 21 experience homelessness over the course of a given year.<sup>2</sup>
- Researchers estimate that about 5% to 7.7% of youth—about 1 million to 1.6 million youth per year—experience homelessness.<sup>3</sup>
- Other sources suggest that approximately 110,000 youth are living on the streets and other public places, cars, abandoned buildings: 55,000 homeless youth age 18-24 living long-term on streets or in public places plus 55,000 young teenagers age 12-17 living on the streets.<sup>4</sup>

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<sup>1</sup> U.S. Department of Health and Human Services, Administration for Children and Families. (2007). *Promising Strategies to End Youth Homelessness: Report to Congress*. Washington, DC.

<sup>2</sup> Ringwalt, C., Greene, J., Robertson, M., & McPheeters, M. (1998). The prevalence of homelessness among adolescents in the United States. *American Journal of Public Health, 88*, 1325-1329.

<sup>3</sup> National Alliance to End Homelessness. (2006, May). *Fundamental Issues to Prevent and End Youth Homelessness. Youth Homelessness Series, Brief No. 1.*

<sup>4</sup> National Alliance to End Homelessness, et al. (2009, February 10). *Advocates sign-on letter to President Barack Obama urging him “to support federal policies to confront the social crisis of youth homelessness in America.* Retrieved April 19, 2010 at <http://www.endhomelessness.org/content/article/detail/2202>.

- US Department of Education reports that in 2008-2009 52,950 unaccompanied homeless youth were served by local education agencies (school districts) that receive McKinney-Vento subgrants. This is about 69% more than the number of unaccompanied youth reported in 2006-2007. About two-thirds of all homeless children identified by schools are doubled up and staying with family or friends; 23% are in shelters, 4% unsheltered, and 6% staying in hotels or motels. (Information about primary nighttime residence is not reported separately for unaccompanied youth.)<sup>5</sup>
- Unaccompanied youth were 2.2% of the total number of sheltered homeless individuals in 2009 (22,631 out of 1,034,659 total) down from a high of 4.7% in 2006.<sup>6</sup> Children and youth under the age 18 comprised 22% of the all person in shelters and transitional housing in 2009 (over 344,000 young persons sheltered)
  - 50% of sheltered homeless children (172,000) are under age 6;
  - Families tend to stay in shelters for longer periods of time than other shelter users
  - Increases in the numbers of people seeking family shelter increases the risk of unaccompanied youth homelessness. Shelter policies regarding adolescent children can lead to family separation as older and adolescent males are frequently required to be housed in male, adult shelters.

**2. Youth become homeless as a result of:**

- Leaving (including running away) home often, but not always, as a result of a severe family conflict which may include abuse
- Being locked out or abandoned by parents or guardians
- Leaving foster or institutional care (including running away, aging out or being discharged)
- Some youth are members of families experiencing homelessness or severe residential instability.

**3. Research on demographics provides an inconsistent profile<sup>7</sup>:**

- Some studies suggest that racial and ethnic minority youth, gay, lesbian, bi-sexual and transgendered and questioning (LGBTQ) are over-represented
- Others suggest no significant differences between homeless youth and the larger population

**4. Relationship between homelessness and education:**

- Many youth who become homeless have a history of academic difficulties including suspensions and expulsion<sup>8</sup>
- If the youth has not dropped out prior to becoming homeless, the experience of homelessness frequently disrupts schooling<sup>9</sup>

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<sup>5</sup> National Center for Homeless Education. (2010, April). Education for Homeless Children and Youth Program: Analysis of Data From the SY2008-09 Federally Required State Data Collection for the McKinney-Vento Education Assistance Improvements Act of 2001 and Comparison of the SY2006-07, SY2007-08, and 2008-09 Data Collections.

<sup>6</sup> U.S. Department of Housing and Urban Development, Office of Community Planning and Development. (2009, July). *The 2008 Annual Homeless Assessment Report to Congress (AHAR)*. Washington, DC.; and U.S. Department of Housing and Urban Development, Office of Community Planning and Development. (2010). 2009 Annual Homeless Assessment Report (AHAR), forthcoming.

<sup>7</sup> U.S. Department of Health and Human Services. (2007). *Promising Strategies*.

<sup>8</sup> U.S. Department of Health and Human Services. (2007). *Promising Strategies*.

<sup>9</sup> U.S. Department of Health and Human Services. (2007). *Promising Strategies*.

- A recent study of 18-21 year-old homeless youth found that, at the point of program intake, two-thirds had not obtained a high school diploma or a GED certificate.<sup>10</sup>
- “Young people who are able to stay in the same community or in the same schools as before they became homeless have a better chance of avoiding the dangerous consequences for youth who do not have familiar support.”<sup>11</sup>

**5. Homeless youth and trauma:<sup>12</sup>**

- Youth who become homeless are more likely to have experienced some of multiple forms of trauma including sexual abuse, neglect, early parental separation, and/or out-of-home placement
- Homeless youth are highly vulnerable to coercion and trauma and at risk of suffering from anxiety disorders and PTSD
- Additionally, those that have been abused or neglected are at increased risk of abusing or neglecting their own children. The likelihood of personality disorders, depression, anxiety, and substance abuse is also higher among those who have been abused and neglected. Research also shows that abuse and neglect affects a youth’s behavior and ability to learn.

**6. Homeless youth and foster care<sup>13</sup>**

- Each year approximately 29,000 youth ages 18 and older transition from foster care to legal emancipation or ‘age out’ of the system<sup>14</sup>
- 25% of former foster youth had been homeless within 2.5 to 4 years after exiting foster care
- “National data for 1998 show that 54% of placements into foster care involved neglect; 23% involved physical abuse; and 12% experienced sexual abuse”.<sup>15</sup>

**7. Homeless youth engage in risky subsistence strategies**

- This includes: selling drugs, panhandling, stealing, and sex work as a means of getting money and food<sup>16</sup> and that they have high rates of prior arrests and convictions. For instance, in a Chicago study, 58.2% of youth reported engaging in stealing, 51.5% selling or trading drugs, 24.2% selling or trading sex (30.9% of female respondents), and 46.5% reported one or more prior arrests, 52.7% of which resulted in a conviction.<sup>17</sup>
- GLBTQ: one out of five homeless youth self-identify as lesbian, gay, bisexual, transgender or questioning
- **Substance abuse<sup>18</sup>**
  - Homeless adolescents have higher rates of substance use disorders than housed youth (according to research); rates are estimated at 70-85%

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<sup>10</sup> Barber, C., Fonagy, P, Fultz, J., Simulinas, M., & Yates, M. (2005). Homeless near a thousand homes: Outcomes of homeless youth in a crisis shelter. *American Journal of Orthopsychiatry*, 75, 347-355.

<sup>11</sup> National Alliance to End Homelessness. (2006, May). *Fundamental Issue.s*

<sup>12</sup> U.S. Department of Health and Human Services. (2007). *Promising Strategies*.

<sup>13</sup> National Alliance to End Homelessness. (2006, May). *Fundamental Issues*.

<sup>14</sup> National Alliance to End Homelessness. (2010, January). *Youth Homelessness*. Fact Sheet. Washington, DC.

<sup>15</sup> U.S. Department of Health and Human Services. (2007). *Promising Strategies*.

<sup>16</sup> U.S. Department of Health and Human Services. (2007). *Promising Strategies*.

<sup>17</sup> Center for Impact Research. (2005). *Wherever I can lay my head: Homeless youth on homelessness*. Chicago: Author.

<sup>18</sup> National Alliance to End Homelessness. (2006, May). *Fundamental Issues*.

- 75% of street youth using marijuana, 33% using hallucinogens, stimulants, and analgesics, and 25% using crack, other forms of cocaine, inhalants and sedatives. Street youth have the highest rate of use and use often increases with age.
- Many have co-occurring alcohol, other drug use, or mental health disorders
- **Mental health**
  - Research shows higher prevalence of depression, suicidal initiations, and other mental health disorders among homeless youth than among housed matched groups or the general population
  - “Homeless youth are a higher risk for anxiety disorders, depression, post-traumatic stress disorder, and suicide”<sup>19</sup>
- **Physical Health**<sup>20</sup>
  - Chronic health conditions that are common among homeless youth:
    - Asthma and other respiratory problems
    - Hypertension
    - Tuberculosis
    - Diabetes
    - Hepatitis

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<sup>19</sup> National Alliance to End Homelessness. (2006, May). *Fundamental Issues*.

<sup>20</sup> National Alliance to End Homelessness. (2006, May). *Fundamental Issues*.

## Overview of Best & Promising Practices

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Following is an overview of effective practices and strategies to prevent and end youth homelessness. There are six major areas that are consistently referenced in reports and studies on youth homelessness that must be addressed in order to successfully prevent and ultimately end homelessness for this population. These include:

**1. Independent Goal-based Service Planning**

Services for youth should be driven by service planning that has concrete objectives around measurable outcomes such as obtaining housing, employment, vocational training, education and life skills. These should reflect the long-term goals that the young adults have for themselves.

**2. On-going support services connected to mainstream resources**

Services for youth should also be available for as long as the youth needs support. Connecting youth to mainstream resources such as case management, SSI, Food stamps, and Medicaid is a critical service.

**3. Independent Living Skills Training**

Because homeless and at-risk youth often come from dysfunctional environments, they have not been exposed to or taught normal day-to-day skills needed to function in society. Youth need to learn how to survive on their own by learning skills such as career development, education, job training, financial management, residential living/home management skills, and personal hygiene and safety.

**4. Connections to supportive and trusting adults and a support network**

Youth need access to their parents or other reliable and trusting adults to support them and assist them in securing housing, education and employment. Peers can also play a key role in creating a supportive network.

**5. Employment and Education**

In order to have income to meet basic life needs, youth must have an education and vocational training so that they can secure employment and income.

**6. Affordable Housing**

In order to ensure that youth can obtain and maintain stable and safe housing, they must have access to affordable housing opportunities; this might be in the form of public housing, Section 8, or other forms of rental assistance. For youth with disabilities, access to permanent supportive housing can be an important resource for maintaining stable housing.

The information that follows is organized according to strategies for unaccompanied youth, youth still in families and strategies that serve all youth.

## Strategies for youth who are part of families

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### 1. Homelessness Prevention and Rapid Re-housing

Strategies that prevent family homelessness or help families quickly regain housing can provide significant benefits for youth who might otherwise become homeless with their families. Too often youth are separated from other family members when homeless shelters do not accommodate older children (particularly male teenagers). Rapid re-housing usually offers families short-term rental assistance and/or other flexible financial help (for security deposits, utility bills or moving costs) and services that help families get into housing and establish connections to ongoing support. This can be an effective strategy for keeping families together and preventing or quickly ending homelessness for youth who can stay with their families.

### 2. Prevention of Child Abuse and Neglect

#### a. Parent Education<sup>21</sup>:

- Can be effective in reducing rates of child abuse and neglect among high risk families and shows promise in preventing youth homelessness
- Schools are a delivery system for parent education targeted to teenagers
- Behavior principles: Parent Nurturing
- Psychological principles: Parent Effectiveness Training
- Some parent education programs lead to reductions in risk factors for child abuse; most studies focus on short-term gains; little known regarding long-term impacts

#### b. Home Visiting<sup>22</sup>

- Bring services to families with young children
- Factors that maximize program effectiveness:
  - Comprehensive, frequent visits
  - Flexible core educational program
  - Staffing by well trained professionals
  - Connecting families to needed services
- Studies of home visiting programs have not tested the same intervention so it is not possible to link interventions to documented outcomes.

#### c. Family Preservation

- Working with families to keep them intact and prevent youth from running away or being locked out<sup>23</sup>
  - 12-week comprehensive intervention program for at-risk youth and their parents
  - Services include: mediation, parenting workshops, short-term respite care for older adolescents, safe haven for young children

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<sup>21</sup> U.S. Department of Health and Human Services. (2007). *Promising Strategies*.

<sup>22</sup> U.S. Department of Health and Human Services. (2007). *Promising Strategies*.

<sup>23</sup> National Alliance to End Homelessness. (2009, March 20). *Model Programs of Prevention and Re-Housing for Unaccompanied Youth - Youth Service Inc.'s Family Preservation Program*.

- Goal is to have cases closed from Department of Human Services upon program completion.

d. **Functional Family Therapy**

- Outcome driven, tested over 30 years
- Family based prevention/intervention for youth 11-18 at risk of or presenting problem behaviors
- Multiphase intervention with specific goals for each phase
  - Engagement and motivation
  - Behavior change – guided and modeled by clinicians
  - Generalization – applying positive changes to other issues
- Studies have shown a reduction in adolescent re-arrests by 20 to 60% compared to no treatment, other family therapy interventions, and traditional juvenile court practices such as probation.

e. **Multi-Systemic Therapy**

- Intensive family and community-based clinical intervention targeted to chronic, violent or substance abusing juvenile offenders age 12-17 at risk of institutional placement
- Uses community based systems (family, peers, school and neighborhood) to facilitate and promote change in natural environment
- Home based delivery model – empowers parents
- Evaluated in randomized clinical trials, for serious juvenile offenders achieved demonstrated reduction of 25 to 70% in long term rates of re-arrest.

**3. School based services**

In addition to strategies that help to support families and prevent child abuse and neglect, school-based strategies can also help to keep young people connected to their schools, teachers and mentors. These relationships can help to protect youth from the risks associated with family conflict, unstable housing, and homelessness.

Congress has provided strong educational rights for homeless children and youth. These services are available for youth who are homeless with their families as well as unaccompanied youth. Under the education subtitle of the McKinney-Vento Act, all school districts must keep homeless children and youth in the school they were attending before they lost their housing, or the school in which they were last enrolled, if that is in their best interest. School districts also must provide transportation to make this school stability possible. If a school move is necessary, homeless children and youth can enroll in school and begin attending immediately, even if they cannot produce normally required documents. Every school district in the United States must designate a homeless liaison to ensure that these rights are implemented in the district. Homeless liaisons have many critical responsibilities, including identification, enrollment, and collaboration with community agencies.

**4. Other strategies that can help to prevent youth homelessness**

For youth who need more intensive support services, therapeutic foster care can be effective. Emergency foster care can also provide some protection from homelessness for youth when families experience a crisis, such as the arrest of a parent.

## Strategies for unaccompanied youth

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### 1. Supporting Successful Transitions to Independent Living<sup>24</sup>

- a. **Affordable housing** is critical to youth aging out of foster care
- b. **Independent Living Skills Training**
  - Research has shown that the following are critical components in preparing youth to live on their own:
    - Assessments: academic/educational levels; employment/vocational skills; personal and social skills; health; residential living/home management skills; personal hygiene and safety; spending/budgeting/banking.
    - Life skills preparation and training: education/job training; career development; assistance securing stable and affordable housing; accessing community resources;
  - Results from the most comprehensive study of outcomes for youth formerly in foster care demonstrate that consistent training in the following areas was associated with positive outcomes:
    - Health care
    - Education
    - Employment training opportunities
    - Must go beyond classroom instruction and provide experiential learning and practice
    - The Ansell Casey Independent Living Skills assessment and curriculum addresses communication, daily living, career planning, home life, housing and money management, self-care, social relationships, work life, work and study skills.

### 2. Gateway Services: RHYA (Runaway Homeless Youth Act) Street Outreach and Drop In

- a. **Street outreach – engage those most mistrustful**
  - Successful outreach: trained in youth development principles, know how to communicate with young people; respect personal space.
  - Able to connect to services
  - Know street culture
    - Peers as outreach workers promising strategy
  - Collaboration among outreach teams to provide greater coverage and reduce duplication of effort<sup>25</sup>

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<sup>24</sup> Although there are over 130 transitional living programs currently in operation serving more than 4,000 youth annually, scant data exists regarding their effectiveness. In fact, while a literature search conducted for this report found a significant increase in the number of peer reviewed articles focused on youth who are homeless in the past decade, with over 60 articles published in the past three years alone, only three of these – less than 5% -- contained evaluations of programs or program outcome data, only one of which examined the outcomes of a transitional housing program. Source: U.S. Department of Health and Human Services. (2007). *Promising Strategies*.

**b. National runaway switchboard**

- Facilitates access to services and/or bus tickets to help runaways return home

**c. Drop-In Centers**

- Initial point of contact for services
- Provide immediate subsistence needs
- Site for case management

**3. Shelter and Stabilizing Services<sup>26</sup>**

**a. Shelter**

- Should emphasize stabilizing youth and reunification with families
- Younger youth and those experiencing first episode of homelessness are more likely to reconcile with families if early intervention is available.
- Many youth in shelters are younger and first time homeless; street homeless youth more likely to have been homeless longer or more frequently
- Youth shelters provide a safe alternative to adult shelters and the dangers of victimization and life on the streets
- Research supports that the first episode of homelessness is critical time for intervention
  - Follow-up when youth are reunited with families is critically important
- Barriers to accessing services at shelters include:
  - Program rules (wake up time, curfew, and prohibitions on smoking, alcohol and drugs)
  - Fears/concerns for personal safety
  - Fears/concerns of poor treatment by shelter staff
  - Some shelters screen youth who present with severe problems
- Federal law requires that shelter programs contact a youth's family within 72 hours of admission to the shelter
  - Critical step to reunification – a primary goal of the Runaway and Homeless Youth Program
  - Some state laws require that shelters contact parent or guardian sooner for permission to enter shelter program

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<sup>25</sup> Examples include: StreetWorks Collaborative, Minneapolis 12 youth serving organizations conducting street outreach to homeless youth – emphasis on relationship building, provide basic needs and referrals and financial assistance available for one shot deals; Community Human Services, Oakland Peer-based Outreach team providing emotional support and basic needs; able to make referrals to wide array of housing and services.

<sup>26</sup> Some promising shelter strategies include: Maine's Rapid Response Program - Over 25 state and local agencies work together to intervene during the first 72 hours of homelessness. Program keeps children in school, provides family intervention services and mediation and evidence shows decrease in suicide, gang involvement, criminal activity, drug and alcohol use. and Daybreak Emergency Shelter, Dayton, OH - Serves homeless youth up to 18 ; wide array of services provided, safe shelter with high security, philosophy of re-parenting and providing high level of support Strong aftercare program; on-going services available for as long as youth wants to stay connected. Positive outcomes include: 54% of minors returned home, 37% found safe alternative housing (relatives, Daybreak housing, or foster care); 81% of 18-year-olds found permanent safe housing; 27% of 18-year-olds secured employment while living in shelter.

- As a result many shelters require identification and/or parent contact information (This is a barrier to accessing shelter for many youth)

#### 4. Transitional Housing

##### a. TLP (Transitional Living Programs)<sup>27</sup>

- Provide shelter, life skills and services to children who cannot be reunited
- For youth 16-21 and generally provide up to 18 months of assistance
- Serve youth leaving foster care and homeless youth
- Avoid long term dependency on social services
- Make successful transition to independent living
- Living accommodations include host family homes, group homes or supervised apartments
- Services include case management and
  - Life skills
    - Employment training
    - Mental and physical health care
    - Housing placement
    - Benefits assistance
- Research indicates that to be most effective TLP services should recognize adult-like status of homeless youth and teach life skills that youth may not have learned earlier
- Requirements to remain in TLP:
  - Rent payment required (based on ability to pay)
  - Contribute money toward household expenses or savings
  - Attend school/educational program and/or remain employed
  - Be drug and alcohol free and meet house rules (curfew)
  - Participate in activities
  - Assist in housekeeping
  - Be part of the program by assisting staff in screening new youth entering program
- Compared to other programs, TLPs offer more privacy, are more service intensive, and have more requirements and expectations for youth participation. Some will not admit ‘hard-to-serve’ adolescents

##### b. Foyer Model<sup>28</sup>

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<sup>27</sup> Youth Villages Transitional Living, multiple locations nationwide

- Serving 17-22 year olds; Program lasts 6-8 months and provides: life skills, community reintegration, vocational skills, and job training and experience
- Youth work closely with transitional specialists to assist through every aspect of the program
- Positive outcomes include: after 24 months - 87% are living in stable housing and 78% are in school, working, or both

<sup>28</sup> Chelsea Foyer, New York City

- Common Ground – developer and facilities manager Good Shephard Services providing support services
- 40 units (in 207 unit building) for 18-25 year olds who are aging out of foster care, homeless or at-risk of becoming homeless

- Developed in Europe
- Youth who cannot live at home assisted in transitioning to independent living
- In addition to housing, residents receive intensive case management, and linkages to job training, education and life skills development

**5. Longer-term affordable housing<sup>29</sup>**

- In most communities there has been less experience with permanent affordable housing for youth, and significantly less documentation and evaluation, compared to housing models for homeless adults
  - Differences with transitional programs:
    - Permanent housing is more flexible
    - Provides longer-term support
    - Has fewer admission criteria
  - Give residents the rights and responsibilities of tenants
  - Longer term housing falls into scatter site and cluster/congregate care models
  - Typically target youth 18-25

**6. Permanent supportive housing for homeless youth**

- Serve persons of legal age (18 and up)
- Scatter and single site models
- Service participation may be voluntary
  - Little difference noted in service participation between voluntary and mandatory programs
- Rent payments generally required

**7. Rapid Re-housing<sup>30</sup>**

- Documented to be effective in serving range of homeless populations

- 
- Focus on individualized support services developed in “Action Plan” with a focus on lifeskills and workforce development. Youth enter into a contract and pay a program fee that is saved and returned upon exit. Discharge planning is key and begins upon entry into the program
  - Alumni report that: 90% are living in stable housing; 92% are employed part-time; 75% have health insurance; 93% earned a high school diploma or GED; 44% are pursuing higher education or vocational training

<sup>29</sup> Housing Supports for Youth Aging out of Foster Care

- New York City, Section 8 Priority Code - provides Section 8 vouchers or public housing units to qualified current and former ACS Independent Living clients
- Connecticut Department of Children and Families, Community Housing Assistance Program – youth receives subsidy to cover rent, food, utilities, transportation, and other living expenses. Youth must be enrolled in school or working. Average length of stay is 2 years.
- England’s Children Leaving Care Act of 2000 – government focused attention on performance management and tracks 9 indicators including housing. Government provides resources to housing for all youth leaving care – in 2008, 88% of youth leaving care are in “suitable accommodations” up from 69% in 2001 (Common Ground Conference Report).

<sup>30</sup> Hennepin County Rapid Rehousing County contracts with providers to provide: host home programs with family reunification services for recently homeless youth; rapid exit screening and advocacy services in drop-in centers and shelters and short-term housing subsidies

- Studies show that young people benefit most if intervention occurs at first instance of homelessness and if connections are maintained to school of origin

#### 8. Transition in Place<sup>31</sup>

- Programs transfer units into the tenant's name once tenant is ready for independent living – a housing subsidy may or may not continue. Generally tenants can access supportive services as needed moving forward.

## Strategies applicable to all youth

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### 1. Supporting Positive Youth Development strategies that focus on at-risk youth

- a. **Positive Youth Development** approach includes prevention and resiliency. These models incorporate elements and practices that include:
  - Focus on preparing youth for successful adulthood by fostering development of positive traits, personal and social developmental assets
  - Strengthening social, emotional, behavioral, cognitive and moral competencies
  - Opportunities for youth to engage in leadership, planning and decision-making
  - Building self-efficacy, a sense of competence and personal identity and control over their future
  - Connection to caring adults
  - Nurturing, trusting and mutual relationships with adults and peers
  - High expectations for success and achievement
  - Structure and consistency in program delivery
  - Longer term interventions (9 months +)
- b. **National Guard Youth Challenge Program** provides training, mentoring and leadership development for at risk youth. The program begins with a residential phase and may provide an opportunity for stability for youth who do not have safe or stable housing.

### 2. Reducing Violence and Delinquency Among Juveniles<sup>32</sup>

- a. **“Youth Courts”**
  - Modeled on successful ‘homeless courts’ which seek to decriminalize lifestyle crimes associated with being homeless

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<sup>31</sup> Daybreak Housing Program, Dayton Ohio

- o 33 Scatter Site apartments in the community – lease starts off in the name of agency and youth tenant; when tenant is ready, lease is transferred into only client's name
- o Aftercare services available, strong alumni connections, clients can access on-going services

<sup>32</sup> National Alliance to End Homelessness. (2006, May). *Fundamental Issues*.

- Especially relevant for youth since they are susceptible for arrest for ‘status’ crimes by virtue of being under age 18
- According to the National Association of Youth Courts there are over 1400 youth courts though out the country

**b. Intensive After Care Program**

- Provides a continuum of supervision and services to high risk juvenile offenders during institutionalization and after release.
  - Pre-release preparation and planning
  - Supportive services by institutional and aftercare staff
  - Long term re-integration services – access to services and monitored
- 5 principles:
  - Preparing youth for progressively increased responsibility
    - Facilitation youth-community interaction and involvement
    - Work with youth and support system to develop successful traits and adjustment
    - Developing new resources and supports
    - Monitoring and testing in community
  - Comprehensive case management – team oriented approach
    - Identify and assess high-risk youth using validated instruments
    - Develop individualized care plans
    - Small case loads
    - Available 24/7
  - Supervision and monitoring based on system of graduating sanctions
  - Rewards that holds youth accountable and provides incentives for positive behavior
  - Linkages with community resources and social networks
- IAP interventions reduce juvenile recidivism rates and lead to successful transition from justice system into the community and thereby reduce homelessness among high-risk population

**c. “Serious and Violent Offenders Re-entry Initiative”**

- Interagency effort that funds state criminal and juvenile justice agencies to develop, implement, enhance and evaluate re-entry strategies
- Three phases:
  - Institution based programs to help incarcerated youth prepare for re-entry.
  - Community based programs that work with ex-offenders pre- and post-release
  - Community based long term support programs
- Only 10% of target population is youth

**d. “Responsible Reintegration of Youthful Offender” – Department of Labor**

- Addresses workforce challenges to young offenders
- Demonstration grants in 15 states that link youth offenders to jobs in high-growth industries

**e. Individual Development Accounts** assist in developing effective financial management skills

- IDAs are an important step toward financial literacy and are the start of asset-building; through these programs youth build financial knowledge, save for education and receive matching funds.<sup>33</sup>

**f. Connections to caring adults**

- Explore resources of families: biological, foster and adoptive
- Facilitate visitation between youth and family
- Engage families in development of plans for youth
- Develop alternative support systems

**3. Targeted Supportive Services**

**a. Stages of change model**

- High risk youth intervention adapting stages of change model<sup>34</sup>
- Assessment of where young people are in relation to their readiness and/or willingness to change
- A guide to inform youth worker's use of self in their work with young people;
- A foundation for designing engagement and competency-building programming that meets young people where they are

**b. Critical Time Intervention (CTI)**

- Well-researched and cost effective Evidence Based Practice assists homeless persons in their transition from the streets, homeless shelters, psychiatric hospitals or the criminal justice system into the community.
- The primary goal of CTI is to prevent recurrent homelessness and other adverse outcomes among formerly homeless individuals during the period following placement into the community. This is accomplished by strengthening the individual's long-term ties to services, family, and friends and providing emotional and practical support during the critical time of transition.

**c. Employment Services**

- **Social enterprise:**<sup>35</sup> owning and operating businesses that offer employment and job training

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<sup>33</sup> Juma Ventures in San Francisco pioneered the first IDA program for youth. It is one component of a program that also include job skills training, part-time employment, college preparation services, financial literacy education, and case management support. Documented results of the program include: increased rates of high school graduation; continuance on to higher education; maintaining enrollment in higher education, and among highest risk youth – those entering from the juvenile justice system, reductions in recidivism rates, San Francisco. Source: Juma Ventures. (n.d.). *Program Overview*. Retrieved April 19, 2010 at [http://www.jumaventures.org/pages/what\\_program\\_overview.html](http://www.jumaventures.org/pages/what_program_overview.html)

<sup>34</sup> Crime and Justice Institute. (2006, January 26). *Interventions for High-Risk Youth: Applying Evidence-Based Theory and Practice to the Work of Roca*. Boston, MA: Crime and Justice Institute.

<sup>35</sup> New Door, San Francisco, assists 14-21 at-risk youth with employment opportunities both in agency run and outside businesses, job training, and community building activities. 91% of job-training clients are working two years after hire. 93% of job-training clients are in stable housing upon graduation compared to 35% when entering the program; no enterprise employees are homeless after two-years. 23% of clients received public assistance upon entering the program; at the two-year

- **Internship programs:**<sup>36</sup> place high-risk youth in internship in local business/community organization, provide mentors to supervise youth
  - **Job readiness:** classroom instruction and job search support; training and life skills and budgeting training
  - **Job Corps:** or other employment programs for youth that offer a residential component combining training and work experience with a place to stay, meals, and access to some basic support services and life skills
  - **Supported Employment**
    - An evidenced-based practice used to assist persons find and keep competitive employment. Originally conceived for mentally ill persons, the program can be employed for youth and other populations.
    - Obtain competitive employment in the community and provide support to ensure success in the workplace
    - Principles include: consumer choice/preferences, employment integrated with treatment, on-going support once employment is obtained, job search/employment work begins upon entrance to program<sup>37</sup>
- d. SOAR SSI Training**
- Targeted training to increase approval rates for SSI coverage on initial application
  - Training has been demonstrated to be highly effective with multiple groups with significant disability and services needs including:
    - People living with HIV/AIDS
    - People with disabilities leaving criminal justice settings
    - Homeless persons with disabilities including the chronically homeless

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follow-up none receive public assistance. Source: New Door Ventures. (2010). *Program Impact*. Retrieved April 19, 2010 at [http://www.newdoor.org/browse/program\\_impact\\_and\\_evaluation](http://www.newdoor.org/browse/program_impact_and_evaluation)

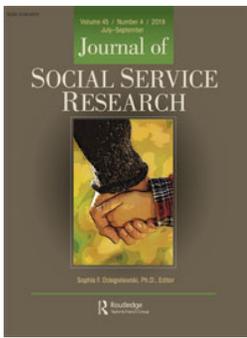
<sup>36</sup> YouthCare, Seattle: Employment Training Programs

- Works with homeless, transitioning and at-risk young people ages 16-23 year olds on job training, placement, retention and provides internship opportunities.
- Working Zone Tile Project -- 10-week arts-based, pre-employment training program
- Barista Training and Employment - 8-week work training program with hands-on barista training, customer service training, career exploration, internships, resume and interviews skills training. Program includes one year of case management and employment counseling
- YouthTech – 16 week training program in Cisco Systems IT Essentials I: PC Software and Hardware. Youth learn to build, configure, upgrade, and maintain a personal computer system. They receive 12 community college credits.

Source: YouthCare. (n.d.). *Shelter Support Success*. Retrieved April 19, 2010 at <http://www.youthcare.org/index.php/services/training>

<sup>37</sup> Washington State Dept. of Social and Health Services, Office of Research and Data Analysis, Olympia, WA (1996). one study in showed that of 576 persons with developmental disabilities and/or mental illness receiving Supported Employment training, 70% were still employed after one year.

- SOAR has a rigorously structured curriculum to train case managers in processing applications with Social Security including detailing the information to be initially presented to SS and comprehensive follow-up
- Data shows that of the 4386 total decisions of SOAR applications, 71% were positive (compared to 10-15% which is the average for this population) and took an average of 89 days for the decision.



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To cite this article: Arshi Shaikh & Hiren Rawal (2019) Interconnections among Homelessness, Family Separation, and Mental Health: Implications for Multi-Sectoral Social Services , Journal of Social Service Research, 45:4, 543-557, DOI: [10.1080/01488376.2018.1481174](https://doi.org/10.1080/01488376.2018.1481174)

To link to this article: <https://doi.org/10.1080/01488376.2018.1481174>



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## Interconnections among Homelessness, Family Separation, and Mental Health: Implications for Multi-Sectoral Social Services

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### ABSTRACT

This qualitative study explored the interconnections among the phenomena of homelessness, family separation, and mental health and substance abuse issues within the social services, geographic, and infrastructure context of northern Ontario. In-depth semi-structured interviews were conducted with thirteen participants. Findings revealed the effects of colonization in the form of poor and overcrowded housing conditions in the northern First Nations, difficulties in obtaining affordable and suitable housing in northern towns and cities, reliance on the scarce social services for survival, and valiant attempts to cope with the cold climate of northern Ontario. All participants reported multiple and inter-generational experiences of separation from family due to involvement of child welfare system, placement in residential schools, death of family member(s), flooding, and epidemics. Participants described their lifelong struggles with mental health and substance abuse issues. All three phenomena were tied together in various configurations of causes and consequences. The implications include the need for critical examination of the historical policies and practices, early intervention for mental health and substance abuse issues, greater support for youth transitioning out of care, creation of a continuum of housing options, collaboration across multiple social services sectors, and incorporation of Indigenous worldview and practices in the mainstream services.

### KEYWORDS

Homelessness; family separation; mental health; Indigenous; Northern Ontario

Homelessness is a global issue, encountered within both developed and developing countries (Busch-Geertsema, Culhane, & Fitzpatrick, 2016). In Canada, homelessness emerged as a pressing social issue in the 1980s, when the federal government began to curtail investments in affordable, low-cost, and subsidized housing (Gaetz, Gulliver & Richter, 2014; Piat et al., 2015). Initially, the problem primarily appeared to affect a single man. However, in recent years, homelessness also appears to affect youth, women fleeing violence, seniors, and Indigenous people (Gaetz et al., 2014). Recent estimates show that over 235,000 Canadians experience homelessness in a year (Gaetz et al., 2014).

In Ontario, as elsewhere in Canada, most research pertaining to homelessness is carried out in the urban centres situated within the southern parts of the province (Figueiredo, Hwang, &

Quiñonez, 2012; Gharabaghi & Stuart, 2010; May, 2015). Researchers' knowledge about homelessness and housing issues generally reflects their southern sensibilities and southern realities. This limited focus poses special challenges for northern social service and health care providers, who deliver services within a unique historic, geographic, cultural, linguistic, and socio-economic context (Graham, Brownlee, Shier, & Doucette, 2008). Notable differences in the access to a range of housing and homelessness services, mental health and health care services, and transportation are observable between northern and southern Ontario (Canadian Mental Health Association, 2009, 2011; Kauppi et al., 2015). Furthermore, individuals with lower socio-economic status living in southern Ontario have greater options available for affordable housing as compared to people with lower socio-economic

status residing in northern Ontario (Kauppi et al., 2015).

Given such differences, northern service providers emphasize the need to generate knowledge rooted in the local northern context, in order to inform service development and delivery over a sparsely populated and vast geographic area (Kauppi, Pallard, Stephen, & Neegan, 2013; Graham et al., 2009). This research meets this need by exploring the dynamic interconnections among homelessness, family separation, and mental health and/or substance abuse issues in the mid-sized urban centre of Greater Sudbury, in northern Ontario. By examining these three phenomena, which are most commonly found to be co-existing among vulnerable and marginalized homeless persons (Barker et al., 2014; Pallard, Kauppi & Shaikh, 2015), we anticipate that more local knowledge will enhance understanding about the complex needs of homeless persons among service providers. We also expect that research findings will provide an impetus to the service providers to achieve greater integration and coordination of services across the homelessness and housing services, children and youth services, and mental health care sector in northern Ontario.

Homelessness is created and sustained by the interaction of two major sets of contributing factors: individual-level risk factors, such as family conflict, childhood abuse and trauma, mental illness; and structural-level risk factors, such as low income, lack of affordable housing (Kauppi, Gasparini, Belanger, & Patridge, 2003; Piat et al., 2015). Separation from family is one such individual-level factor strongly linked to homelessness (Kauppi & Pallard, 2015). Such a separation may occur as a result of multitude of factors, including being removed by the child welfare agency (Barker et al., 2014), being placed in a residential school (Kauppi et al., 2013; Leach 2010; Menzies, 2006; Ruttan, LaBoucane-Benson, & Munro, 2008), being rejected by family (Gharabaghi & Stuart, 2010), or by running away from home due to abuse and maltreatment (Andres-Lemay, Jamieson, & MacMillan, 2005).

In addition to coping with pervasive family separation, the homeless population also faces significant mental health and substance abuse

issues, such as posttraumatic stress disorder, major depression, psychotic illness, and alcohol or drug dependence (Lowe & Gibson, 2011; Merscham, van Leeuwen, & McGuire, 2009; Pallard et al., 2015). For instance, runaway and thrown away individuals are likely to experience mental health and substance abuse issues while on the streets (Benoit-Bryan, 2011; Greene, Ringwalt, Kelley, Iachan, & Cohen, 1995; McCarthy & Thompson, 2010; Whitbeck, Hoyt, & Bao, 2000). Furthermore, Indigenous homeless people who were placed in residential schools often experience intergenerational trauma, mental health issues and substance abuse problems during adulthood (Bombay, Matheson, & Anisman, 2009, 2011; Menzies, 2006, 2010).

Despite the frequent co-occurrence of homelessness, separation from family, and mental health and/or substance abuse, few scholars have examined the intersecting realms of these three phenomena. Previous research instead focused only upon the dynamic relationship between two of these phenomena. For instance, Zlotnick (2009) focused upon the intersections between homelessness and foster care, while Merscham et al. (2009) examined mental health and substance abuse indicators among homeless youth. Moreover, a large body of literature falls within the positivist tradition and utilizes quantitative methods. In contrast, our research falls within the qualitative paradigm, and describes the interconnections among the three phenomena from the perspectives of marginalized individuals who experienced all three adversities in life. As Liamputtong (2007) emphasized, scholars need to initiate research from the perspective of oppressed and marginalized people, in order to gain deep insights into complex social issues. Such insights are relevant for service providers in underserved and geographically dispersed northern communities where homeless persons, in particular Indigenous persons, often have complex life trajectories characterized by family dysfunction and violence, placement in residential schools and foster care, overcrowded and substandard housing conditions on reserves, chronic and episodic homelessness, and addictions and mental health problems (Kauppi et al., 2003, 2013).

## Method

We designed this qualitative study to explore the personal experiences of participants with homelessness, family separation, and mental health and addiction issues in the context of northern Ontario.

## Setting

The City of Greater Sudbury, where this study took place, is a major urban centre in northeastern Ontario. Greater Sudbury encompasses a land area of 3410.62 square kilometers, with a population density of 47.1 persons per square kilometer (Statistics Canada, 2012). The main cultural groups in the Greater Sudbury include Anglophone, Francophone, and Indigenous people (Kauppi & Pallard, 2015). The mining industry, and service sectors such as retail, health care and social services fuel the local economy (Pallard et al., 2015). Among the city's population of 160, 770 (Statistics Canada, 2012), the February 2015 period prevalence count of homeless persons identified 440 individuals as absolutely homeless, and 979 individuals as at risk of homelessness (Kauppi, Pallard, & Faries, 2015a). Indigenous (that is, First Nations, non-status Indians, and Metis) persons comprised 44.5% of the homeless individuals, suggesting an overrepresentation when compared to their overall proportion (8.2%) in the general population of the city.

Research shows that people from other northern communities, including First Nations, migrate to Sudbury in search of education and employment opportunities, or mental health and addiction services, and end up facing homelessness for varied reasons – including lack of job opportunities, low wages, tight private housing markets or long wait lists for subsidized housing, mental health and addiction issues, and racism (Kauppi & Pallard, 2015). Even though Greater Sudbury plays a major role providing social and health care services across northern Ontario, funding its network of services is inadequate to provide the continuum of comprehensive services necessary across such a vast geographic area (Canadian Mental Health Association, 2009;

Kauppi & Pallard, 2015; Kauppi, Pallard, & Faries, 2015b). The high and complex needs of service users often overwhelm the social and mental health service system. Service providers encounter multiple challenges in the forms of shortage of personnel and monetary resources, restricted agency mandates, fragmented services and supports, and gaps in services.

## Sampling and Recruitment Strategies

We employed a combination of different sampling methods, including criterion and snowball in order to recruit participants (Creswell, 2013). The inclusion criteria were as follows: (i) experience of homelessness during the lifetime, (ii) separation from family in childhood or adolescence, (iii) presence of mental health and/or substance abuse issues with or without formal diagnosis, (iii) 18 years or above, and (v) able to speak English.

We defined homelessness in a comprehensive and inclusive manner (Daly, 1996; Echenberg & Jensen, 2008), and invited individuals facing absolute homelessness as well as those at risk of homelessness to take part in the research project. We defined absolute homelessness as lack of a place that a person may consider to be a home or lack of a place where he/she can sleep regularly. This may involve chronic, periodic, or temporary situations where an individual might be living on the streets, in emergency shelters, living in a car, with family or friends, or in a long-term institution. Being at-risk of homelessness referred to particular circumstances under which a person might be at an elevated risk of becoming homeless in the immediate future (i.e. pending eviction, extremely low income, familial abuse, inability to pay rent, existing medical condition with no benefits).

Another criterion for inclusion pertained to the history of family separation and mental health and/or substance abuse issues. We conceptualized family as an immediate biological family, while recognizing the fact that participants may not define a family in a similar way, and may prefer to include non-biological relationships in their definition of a family. Similarly, we conceptualized family separation as placements in foster

care, group homes and residential schools, along with being thrown away or running away. However, we were cognizant of the possibility that participants' life stories of family separation may go beyond these experiences. Moreover, we recruited participants in the study who self-identified as suffering from mental health issues and/or substance abuse. We did not require formal diagnosis, since many homeless individuals are unable to access specialized mental health care services (Folsom et al., 2005).

We approached a wide range of organizations and service providers such as shelters, the health clinic, and the drop-in centre, to assist with the recruitment of participants and to arrange for the logistical support to conduct interviews at agency premises. Due to the unstable residential and personal lives of homeless individuals, and their possible attempts to hide their identities and involvement in research, we adopted these recruitment strategies after consulting the literature on the research involving vulnerable populations (Hough, Tarke, Renker, Shields, & Glatstein, 1996; Liamputtong, 2007). Also, we used a snowball method, recruiting a few of the participants through their connections with participants we had already interviewed.

### **Participants**

Thirteen individuals, ten men and three women, participated in the study. Participants were mainly unemployed and single. The participants ranged in age from 18 to 57 years. A large number ( $n = 9$ ) of participants were Indigenous, and relied on social assistance for survival. We encountered several challenges in recruiting female participants. The most common challenges were not meeting the inclusion criteria, or not showing up for the interview. Social service providers indicated that other difficulties in recruiting female participants pertained to potential participants being incarcerated for sex work at the time of study, or being hospitalized for critical illness. In this paper, we have used pseudonyms, and suppressed the names of certain small towns, cities and First Nation communities to conceal the identity of participants.

### **Data Collection Method**

After obtaining ethics approval from Laurentian University, we began our data collection process by engaging the participants in face-to-face semi-structured interviews. We considered in-depth interview to be an appropriate method, since our purpose was to explore the subjective experiences of homelessness, family separation and mental health and substance issues, and to derive a comprehensive understanding of the interconnections among these three phenomena. Hesse-Biber and Leavy (2006) assert that in-depth interviews have the potential to provide valuable access to subjugated voices and knowledge. Hence, this method is particularly considered suitable for research involving such vulnerable and marginalized people as homeless individuals.

We prepared and pilot tested an interview guide, then refined it subsequent to pilot testing. We conducted interviews at a safe, peaceful, and private place, while taking the preference of the participants into consideration. We conducted all but one of the interviews on the agency premises, and we held that one at the university office. The length of the interviews varied from participant to participant. The longest interview lasted for approximately two and half hours, including a short break. On the other hand, the shortest interview lasted for fifty-five minutes. We audio-taped the interviews using digital and micro-cassette recorders, and posed debriefing questions to all the participants in order to ensure that they were not in an emotionally or physically vulnerable situation while terminating the interview session. The participants received a reimbursement of \$20 for the expenses of participation, and a resource book prepared by the Sudbury Action Centre for Youth.

### **Data Analysis Method**

We received support for the verbatim transcription of the interviews from the research team of *Poverty, Homelessness and Migration (PHM)* at the Centre for Research in Social Justice and Policy, Laurentian University. We then analyzed the interviews in light of Tesch's (1990) outline of the circular and iterative process. After

completely immersing ourselves in data, we identified and segregated the relevant and non-relevant sentences and paragraphs, or text segments. We coded the relevant segments with essence capturing words in the margins of text, then clustered similar codes together into broader categories, from which the interrelationships began to emerge. These interrelationships formed the basis of more abstract subthemes and themes presented below. At every step of the process, we consulted with each other, shared ideas, compared codes, and refined categories and themes. Also, we maintained an audit trail and a reflective journal to record thoughts and decisions taken throughout the research process.

## Findings

Findings emerged in the form of three overlapping and interconnected themes and subthemes pertaining to the adversities of homelessness, a history of family separation, and mental health and substance abuse issues.

### Homelessness

All participants encountered unstable lives and homelessness in their adulthood. Their experiences of homelessness were strongly connected with their former experiences of separation from family as well as mental health and addictions issues they and their family members had encountered throughout their life history.

### Experiences of Homelessness

Experiences of homelessness typically involved living on the streets, in shelters, in tents in the northern wilderness, and couch surfing at the homes of friends and relatives. For instance, Tina said that “I came downtown, living on the streets for a little bit, living from couch to couch.” For some participants it meant a movement between absolute homelessness and precarious housing conditions, such as possible impending eviction. Some participants were living in low-rent apartments, lacking functional electric and heating systems, infested with mice and cockroaches, and marred by holes in the walls. All participants described their struggles for survival, and stated

that gradually they became more skilled and adept at meeting their basic needs while living on the streets. Participants often experienced hunger and starvation, and managed to feed themselves by accessing the soup kitchen or salvaging food from the dumpsters. At times, some participants engaged in panhandling or sex work to meet their basic needs.

Along with their struggles around food and money, participants had to face challenges around finding a place to sleep at night. David found a spot in a parking area where he slept on a mattress with several other homeless individuals, while Tim managed to sleep on benches or in a tent erected under the bridge. Other spots for sleeping included abandoned buildings, furnace rooms, concrete block shelters, railroad cars, and washrooms of motels. Sleeping outdoors was particularly difficult in the winter months. Harry used multiple blankets and placed plastic around to block the cold wind. Justin protected himself against cold by wearing four sweaters, two coats and winter boots. Darcy slept outdoors in a sleeping bag during frigid winter and found his toes frozen in the sub-zero temperature; while Gary managed to sleep in cardboard boxes during cold nights.

Sleeping outdoors, either in the forest, on the streets, or on the beach, seemed to pose several challenges for the participants during the hot summer months, too. As Harry stated:

lots of mosquitoes are bad outside... especially in bushes. I had a hard time last night because of the mosquitoes. I just cover up my head, I started bleeding right from the head... Gotta get drunk so you don't feel them bite you (Harry).

During the day time, regardless of the temperature, the participants mentioned walking all over the city, either alone or in the company of fellow street people. They portrayed homelessness as lonesome, upsetting, stressful, overwhelming, and depressing, an experience of life creating deep feelings of emptiness. Tina mentioned “some days it is overwhelming... you go crazy out there. Like where am I going to get my next sandwich. It is pretty hard out there; you know it is totally rough”. Justin described his internal struggles characterized by denial, shame and stoic

acceptance of life circumstances as a homeless person.

I remember the very first time I became homeless, I didn't know what to expect. I didn't want anyone to know about it. After some time, I almost felt it got to a point where I am almost comfortable with it. Over the years, it is just to a point where some people notice that I am almost content with it (Justin).

Some participants reported they moved from one place to another in order to travel and explore the world, meet new people, make new friends or to get away from their troubles and problems. Often participants migrated in search of work and a better life. No matter where the participants migrated and lived, there was no escape from homelessness, mental health issues, and alcohol and drug abuse.

While on the streets, participants met fellow homeless individuals with whom they often developed strong bonds. Cindy mentioned having a street mother who seemed to take good care of her, in contrast to her biological mother. Some participants met their partners on the streets. However, instability and high mobility also created rifts between partners, thus precluding establishment of long-term stable and meaningful relationships.

On the other hand, participants witnessed violence, and felt "unsafe" on the streets. Neil described the experiences of "people dying, getting killed, murdered ... a lady friend, just gave up on life and just died ... a lot of sad moments." Similarly, several participants narrated incidents of fights, murders, and robbery. Adam mentioned living under constant fear, and thinking "when am I going to get robbed, when am I going to get stabbed or who is gonna try to punch me out?" Some participants also reported engaging in self-harm, excessive drinking, substance abuse, and suicidal tendencies.

Some of the participants recognized the significance of available services, primarily the soup kitchen, the corner clinic, and the Salvation Army, in ensuring their sustenance. Gordon said "outreach people are angels that nobody recognizes." However, some participants mentioned that they did not receive adequate services for their mental health and addiction issues, and consequently migrated to different places and

provinces to get those services. At times, street people, particularly Indigenous individuals, experienced discrimination while accessing services. Despite the many challenges in life, participants showed remarkable resilience and strengths.

Adam emphasized the survival skills and strengths of homeless persons,

we are very nice people if you get to know some of us, like extremely nice people and you know you can learn a lot of from all of us, from a homeless person because the homeless person has learned over the years how to survive in the winter and in the summer on the streets. They have learnt to survive (Adam).

### *Indigenous Homelessness*

Nine out of thirteen participants identified themselves as Indigenous (i.e., Cree, Ojibway, Algonquin, Métis), and discussed the housing issues they encountered in remote northern First Nation communities. David, Harry, and Gordon mentioned the severe shortage of houses in their communities, compelling several families to live under one roof. Gordon stated that "if we would have put the people that are living in that house don't belong there, I would say 70% of the people there would be homeless on my reserve alone." He further explained that "homelessness starts in my community. That's why my people are migrating south, because of homelessness itself ... we are overcrowded in those little reservations." In addition, they reported houses in First Nation communities to be lacking such basic amenities as electricity and running water. Darcy described this condition, stating "there was no hydro back then and no water taps inside the house ... I had to carry the water you know from a quarter of mile away." Gordon moved from a small northern town to a remote fly-in First Nation community further up north at the age of six, and realized that "it was like taking a step back in civilization". He expressed his dislike for the reserve by stating "it is like a prison, just like a camp, tell me about concentration camp."

Participants asserted that many social issues, including addictions, violence, incarceration, abuse, and suicide, were directly linked with poor, overcrowded, stressful and chaotic housing conditions. Gordon explained "think of all the

craziness that happens with thirty people in one house ... there were fights ... I guess living in the chaos of a little house full of children ... anybody can go nuts, I guess.” Some participants reasoned that their housing issues and unorganized lives were the result of colonization, residential schools, inter-generational trauma, and loss of land and culture. Gordon further asserted that

It is all chaos ... because they took us out of our own culture ... . Let's say we were a circle and they tried to shove us into a triangle ... and it's so ingrained that I can't even pick up my own culture now. Ever since we allowed to have people build our own homes ... yeah, colonization is what started homelessness (Gordon).

### *Pathways and Perceived Contributing Factors to Homelessness*

In addition to the pervasive issues of inadequate and overcrowded housing within the Indigenous communities, participants' narratives identified multiple pathways and contributing factors to homelessness. Some participants confirmed a strong association between their unstable life (i.e., multiple placements in care, repeated separation and reunion with biological family) in childhood, and current experiences of unstable housing conditions in adult life. Transition out of care without adequate support and skills for independent living was another major contributing factor identified by the participants. For instance, after aging out of care, David did not return to his biological family, since his parents were divorced and he could not get along with his mother's boyfriend. Hence, he became homeless after transitioning out of care. On the other hand, Darcy and Harry ended up in jails and penitentiaries after aging out of foster care, then later faced homelessness when they were released from the jails.

Some participants were reunited and reconnected with family members after their placement in care or residential schools. However, issues such as parental addictions, abuse, altered family structures, or family dysfunction, cut these reunions short, resulting in the participants being kicked out of, or leaving their parental homes. For instance, Adam and Cindy were reunited

with their biological mothers after aging out of care. However, they faced abuse and maltreatment from their parents, and ended up on the streets. Later, Adam managed to acquire accommodation at a shelter. However, his involvement with the police resulted in his eviction from the shelter. As well, Harry ended up on the streets after getting into a fight with the group home staff members. Tina faced homelessness when she was asked to leave home by her adoptive family.

Living independently was challenging for many participants who indulged in substance abuse and faced frequent conflicts with law. Tim said that after foster care he started his life in a bachelor apartment with minimum amenities, receiving financial assistance through the Ontario Disability Support Program. However, he admitted that “I used to spend my money, I used to drink heavily ... seven days a week. No money. No rent. I was out on the streets.” At times, participants perceived an indirect link between parental addictions issues and their experiences of homelessness. They mentioned that parental addictions issues led to their placement in care and later into homelessness when they transitioned out of care. Subsequently, their own addiction issues played a significant role in evictions and homelessness in their own adult lives. Tina admitted that “I couldn't keep it [apartment] because of rent ... I couldn't keep the rent up because I'm so into the alcohol right now.” Similarly, Adam was evicted three times due to partying and addictions issues and ended up on the streets eventually.

Migration from northern First Nation communities to the urban city of Sudbury was another pathway to homelessness. This form of migration was undertaken for various reasons including to access services, to gain employment, to escape chaotic housing, violence and other social issues, and to quell loneliness arising from a perceived monotonous life in First Nations communities. However, Indigenous participants in the city could not escape poverty, homelessness, substandard living conditions, or mental health and addictions issues. Gordon emphasized the need for greater coordination and communication between the service providers in Sudbury and northern First Nation communities to mitigate such problems

for Indigenous people migrating out of their communities. Harry, David, and Matthew met several homeless people from their Indigenous communities on the streets of Sudbury and realized that returning to their own communities was not a viable option for many of them. David stated that “they are homeless now and they choose not to go back where they come from because there is nothing there ...”

Participants identified other structural issues surrounding homelessness, such as the long wait times for subsidized housing, high rents, rising cost of utilities, and low income. Justin shared his observations

I’m noticing it is getting harder and harder ... it’s to a point where people are actually bidding on the apartments... rent’s gone through sky high... since the city has taken the rent cap off... I noticed every year landlords are raising it two or three percent ... sometimes it’s almost doubled (Justin).

On the other hand, a small number of participants who could not tolerate to live in unsafe, unhygienic and ill-maintained rental apartments, preferred to live on the streets, and discussed homelessness as a “personal choice.”

### ***A History of Family Separation***

Participants reminisced about joyous childhood days spent with the biological family in northern wilderness prior to their painful separation. David mentioned that “those were the fun years, running through the forest, fishing, tobogganing,” while Matthew stated “it was being with the family ... my father used to take me go trapping and hunting”. Darcy fondly recalled helping around the house by getting “firewood with the axe.” Subsequently, the participants conceptualized family in a broad sense and described painful memories of separation from biological, foster or adoptee parents, siblings, caregivers, and friends during childhood and adolescence. Moreover, the participants narrated experiences of separation from partners, children, and grandchildren during adulthood.

The participants experienced separation from family due to their placements in foster care, group homes, and residential schools, death of family member(s), flooding and other natural disasters, and scabies or other epidemics in the

communities. They described experiences of separation as “being taken away,” “being given away to child welfare society,” “thrown away,” “kicked out”, and “running away.” For instance, Adam and Neil recalled being taken away at the age of two, while Cindy reported deliberately creating situations where she would “get kicked out of foster home.” Many participants spoke of their placement in group homes and transition homes characterized by constant fights with fellow housemates and staff members. While narrating her experiences of a transition home, Cindy further elaborated

In the transition home, we got our own computers, own room, but we were all bickering with each other. They were trying to see if us four girls living together would work and it didn’t... they closed it because they didn’t have funding (Cindy).

Some participants reported being separated from family members a single time, while others faced multiple separations throughout their lives. Constant movement and unstable patterns of life characterized the recurrent separations in Matthew’s life. He stated that “my childhood [involved] growing up into the Children’s Aid for a period of time ... then from there I went home and then from there I went to residential school for about eight years.” Often the Indigenous participants were taken out of their First Nation communities and placed with the families of European descent in distant northern towns and cities. This weakened their ties with the biological family, the community and their own culture. Also, the biological parents found it difficult to sustain connection with their children due to geographic barriers, such as the breadth of northern wilderness; the lack of infrastructure such as roads; and economic constraints, such as the lack of money to purchase communication devices. Gordon described his experiences of being sent to a high school in a small northern city away from his remote fly-in First Nation community. In this new city, he was placed to live with “Italian families, French families. I was in the city for the first time. I did not know anything. I did not even know anything about toilets, how they flush and how they work.”

Participants not only experienced separation from family during their childhood and

adolescence but also recounted similar experiences during adult life, when they were separated from their biological children and grandchildren. Tina's five children were taken away and placed in foster homes as she was living on the streets. She complained that she was not allowed to see or meet her children due to her unstable living conditions. Similarly, Justin, who fathered a son in his late twenties, moved back and forth between absolute homelessness and the risk of becoming homeless. Eventually he lost his son to the child welfare system due to his unstable life. Gordon lamented that "I got grandchildren in the north I haven't seen yet."

### *Perceived Reasons for Separation*

Participants reported various reasons for separation from their families. These reasons fell within two overlapping categories, parental reasons and personal reasons. David, Tina, Matthew, and Neil attributed their separation and placement in care to parental addictions issues, domestic discord, and neglect. Neil and Gary painfully recalled that their parents gave them away to the welfare workers due to their addictions and illness. Some participants experienced physical, sexual and verbal abuse by their parents and family members which eventually led to placement in care. Adam stated that

I went through extreme abuse when I was with my step-mom, I got hit, I got thrown against the walls, I've seen my dad try to come at me with a baseball bat one day...for the final time I was taken away at the age of twelve...my step-dad had put me against the wall and choked me severely (Adam).

Samantha blamed herself for her separation from family members. She believed that the manifestation of mental health issues in her childhood, her rebellious behavior, and her repeated conflicts with the police, drove family members to place her in care. Similarly, Darcy said that

I got to about the age of 12-13 when I didn't start listening to my mom and dad... so I started smoking dope...drugs, and drinking and stealing alcohol...fighting downtown...didn't bother going home right away from school, so I ended up in foster homes you know (Darcy).

Justin associated separation from family members with the loss and death of his mother and grandmother. In contrast, for Gordon, environmental (i.e., flooding), structural (i.e., forced placement in residential school) and health (i.e., epidemics of scabies) issues played significant roles in the separation from family members.

### *Impact of Separation*

Placement in foster or group homes proved to be traumatic for Cindy, Darcy, Justin, Tim, and Harry, who all reported being physically and verbally abused, as well as bullied, by foster parents, foster siblings, and staff members at the group homes. Cindy recalled being "starved to death" by foster parents, who over-medicated her with Ritalin due to her disability. Harry remembered constant fights and frictions with the group home staff. Tim was suffering from cerebral palsy, and recounted being teased for his disability while in foster care. Gary recollected educational difficulties he faced due to his learning disability, and the lack of adequate support to surmount these challenges in foster homes.

Several participants described separation from biological parents and siblings as emotionally devastating and disturbing. Feelings of immense sadness, loneliness, loss, confusion, and depression engulfed participants, who found it extremely difficult to cope with such upheavals and changes in life. Samantha aptly described the impact of separation in the following statements:

I felt a lot more depressed cause I miss being with my mom...like I was probably crying myself to sleep like every night cause I didn't know what was going on and I wanted to be back with my mom...I was just really upset and depressed...I miss being at home (Samantha).

For Tina, feelings of insecurity and self-blame from being "thrown in a stranger's home" clouded her mind, and resulted in her "pretending that's my mom and dad which it's not, you know." Matthew narrated the emotions and impact of being uprooted from his family, being placed in foster care, and feeling abandoned by his biological parents. Adam described the impact of separation as "I was taught that nobody basically cared about how I was feeling

and that made me grow up in anger. And then if you look at me today, I have been charged several times for assault because of my anger.” While being in care, deep longing for a reunion with the family pierced the lives of participants. Neil expressed these sentiments by stating that “and just being up there looking out the window, wondering when a car is going to get me and take me to my mom... a lot of crying for my mother.” Similarly, Matthew and Gordon, who were placed in residential school, recalled painful memories of the deep longings they experienced for their home, parents, and siblings.

It was hard...leaving your parents for at least ten months of the year...I kept having homesick[ness]. Not full out being with your parents...I was away from home, away from the brothers and the sisters...I think the worst was not being home on the Christmas holidays (Matthew).

While describing the long-term impact of family separation, Gordon ruefully reasoned that “you have to have a solid foundation in order to have a solid structure. That’s what life is all about.” This same idea was echoed by Cindy when she described the impact of repeated separations and multiple placements in care.

I was an emotional wreck, I didn’t know if I was coming or going. I was confused. I had nobody to fall back on to cry on someone’s shoulder. CAS kept me moving like...making kids unstable...it affects them in the long run and if you move a kid from home to home, it causes more of emotional and psychological what is the word imbalance. (Cindy)

### **Mental Health and Substance Abuse**

Participants experienced mental health and/or substance abuse issues at different stages of their lives. Some participants reported that they were diagnosed with mental health issues in childhood and adolescence, while others were encountering them in their adult life. At the time of interviews, the participants reported suffering from bipolar disorder, schizophrenia, mood swings, post-traumatic stress disorder (PTSD), depression, stress, anxiety, phobia, suicidal thoughts, and suicide attempts. Adam said that he attempted suicide four or five times in the past year while suffering from depression. In addition, several participants

reported sleep difficulties, nightmares, flashbacks, and appetite issues as indications of their mental health troubles. The trajectory of drinking and substance abuse revealed an early onset. For instance, Justin began experimenting with drugs at an age of thirteen and called it “recreation,” while Harry stated that “drinking is my hobby.”

### **Perceived Associated Factors**

Participants associated various interconnected factors with their mental health and addictions issues. Complex family structures and dynamics, abusive relationships among parents, and personal experiences of maltreatment, abuse and neglect from biological, foster and/or adoptive parents appeared to be contributing factors to the mental health issues. For example, Gordon attributed his mental health and addiction issues to the experiences of sexual abuse and intense shame he endured as a child in residential school. He explained that he indulged in drugs and alcohol to suppress nightmares and flashbacks of those memories. Later on, his addictions issues drove him into homelessness.

Participants perceived their experiences of separation from family to be strongly connected with mental health and addictions issues. Neil asserted that “I got taken away from my mom, at a young age, yeah that’s probably got a lot to do with it [mental health issues].” Tim, David, Matthew, and Tina reported family histories of addictions which reportedly played a major role in their own addictions problems. Tim began drinking at an early age due to the familial alcohol issues. He explained that “Cause my parents were alcoholics, I used to drink every day.”

At times, violence and dysfunction within the family during adulthood appeared to connect with mental health issues. Neil stated that “I got depression when my daughter got assaulted by my brother... I was depressed for a long time because I wasn’t there to protect her.” David, Gary, and Tina reasoned that death and the loss of loved ones were the beginning point for their addiction and mental health issues. Tina said that “It’s just the deaths that have happened...I’ve been to so many funerals since I was sixteen to now... I kind of went downhill, got into the

drugs, got into drinking.” The deaths of loved ones due to drinking and driving, self-harm under influence, and overdose of the drugs and alcohol deeply impacted the participants’ lives.

Some participants reasoned that their mental health issues were the result of their day to day survival struggles on the streets, homelessness, and precarious housing conditions. Others stated that mental health issues played a more significant role in becoming homeless. Participants also observed a bi-directional connection between mental health challenges and substance abuse. Tina said the alcohol consumption triggered mental health issues, since it acted as a depressant. Darcy stated that addiction caused the mental health issues that he and his fellow homeless people faced. On the other hand, some participants stated that they began drinking heavily to ease the burdens of mental health challenges. Adam shared that

I think by me getting high every day, it relieves my stress levels and my flashbacks kind of slowed down a little bit. But on days where I come off my high, the problems are still there and that’s something I have to live with (Adam).

Alcohol and drug addictions were a major part of participants’ lives. They described addictions as a social issue, particularly in the contexts of remote and isolated northern First Nation communities. Some participants stated that the pervasiveness of violence, suicide, abuse, and addictions in their communities and in their lives was connected with their experiences in the residential schools, the sixties scoop, colonization, intergenerational trauma, and the loss of land and culture.

### **Consequences of Mental Health Issues**

Participants identified several adverse consequences of mental health and substance issues, including trouble with the law or the police, rebellious behavior, their own placement in care, homelessness, and loss of their own children to the child welfare system. Furthermore, participants regretfully stated that their addiction issues affected their relationships with others and with their partners. Tim stated that “Nobody came around to see me when I got my first apartment cause

like I said, I used to drink.” Similarly, Darcy split up with his partner due to his excessive drinking and drugs. Moreover, he did not have any relationship with his children and grandchildren due to his addiction issues. Hence, addiction issues seemed to play an important role in separation from family in adulthood.

Furthermore, Gordon, Adam, Matthew, and Darcy all became homeless due to their addiction issues, and wished they had never indulged in drugs or alcohol. Alcohol and substance abuse affected employment and the work life of some participants. Justin said that “the boss said you know I gotta let you go ... he noticed I was even drinking on the job sites.” Some participants suffered physical health problems as a result of excessive alcohol and drugs consumption.

### **Discussion**

This study explored the personal experiences of three phenomena of homelessness, separation from family, and mental health and/or substance abuse issues in the context of northern Ontario. The complex life trajectories of participants revealed that all three phenomena were tied together in various configurations of causes and consequences. Some participants attributed their family separation and homelessness to their mental health issues and substance abuse, while others considered family separation to be the cause of their mental health/substance abuse issues and homelessness. In contrast, homelessness was also perceived as the precipitating factor for separation from family (i.e., children and grandchildren) as well as for mental health issues and substance abuse in adulthood. The relationships among three phenomena were multidirectional, cyclical and at times fuzzy.

The nature, duration, and frequency of homelessness varied from one participant to another. For instance, two young participants became homeless immediately after aging out of care, while some older participants were homeless for almost their entire lives. The participants emphasized a connection between their homelessness in adulthood and their former experiences of unstable lives characterized by familial dysfunction and repeatedly changing living arrangements.

Penzerro (2003) conducted an ethnographic study of homeless youth who were placed in out of home care due to their emotional and mental health issues. The findings revealed that out of home placement weakened ties with their families of origin, and multiple placements deterred the formation of ties with all the families. Once discharged from care, these youth moved to emergency shelters in their early adulthood. A pattern of drifting became apparent early in the lives of these youth and continued throughout their homelessness trajectories. Similar findings emerged in our study, where some participants moved into homelessness after transitioning out of multiple placements in care, and then remained transient and unstable into adulthood.

Notably, a large number of participants in this study were Indigenous homeless persons. Indigenous participants stated that their homelessness began in their northern First Nation communities, and continued to perpetuate when they migrated to northern urban centres. Anderson and Collins (2014) reported that in the count of homeless people across thirteen large and mid-sized urban cities in Canada, Indigenous people were overrepresented in the homeless population as compared to general population. Furthermore, they recognized that Indigenous people leaving their communities for cities could not escape poor living conditions. In the cities they faced many barriers, including lack of employment opportunities, lack of housing options, limited tenancy skills, cyclical mobility, and racism in securing safe, affordable, and adequate housing. In addition, the dehumanizing colonial practices of appropriation of Indigenous lands, annihilation of traditional ways of living, assimilation through residential schools, and substandard and overcrowded housing conditions were significant contributing factors to urban Indigenous homelessness as we identified in support of previous studies (Anderson & Collins, 2014; Kauppi et al., 2013). Similarly, Menzies (2006) found that the intergenerational trauma associated with colonizing policies resulted in weakening ties with families and communities, and a state of homelessness among Indigenous men in a large urban centre.

In the present study, participants narrated stories of repeated separations from family, at times involving placements away from the home community. The geographic, infrastructure, and economic barriers in northern Ontario prevented the development of strong, positive connections with families and communities of origin – which resulted in further loss of relationships, culture and traditions. In addition, family separation emerged as a significant intergenerational issue for some participants. Having been placed in care and residential schools during their own childhood and adolescence for reasons such as parental addiction, family issues, or their own rebellious behavior, these participants also faced similar separation from their children and grandchildren, due to the involvement of the child welfare system in their adulthood. Marshall, Huang, and Ryan (2011) compared first and second generation child welfare families, and found that second generation caregivers, who had been involved with child welfare systems as children, and then lost their own children to the same system in adulthood, had fewer economic and social resources, and had higher rates of mental health diagnosis, as compared to the first generation caregivers. Moreover, children from second generation families were less likely to be reunified with biological parents than those from first generation families. Hurley, Chiodo, Leschied, and Whitehead (2003) reported that intergenerational child welfare families experienced higher rates of unemployment and lower levels of social support, thus creating a vicious cycle of family separation and associated disadvantages from one generation to the next.

Furthermore, intergenerational cycles of substance and alcohol abuse appear in the narratives of some of the participants exposed to parental addictions issues in childhood, and who then began to indulge in alcohol and substance abuse at a fairly young age. Similar accounts of the intergenerational nature of mental health and substance abuse appear among Indigenous persons (Marsh, Coholic, Cote-Meek, & Najavits, 2015) and homeless individuals with a history of family separation, childhood abuse, and family dysfunction (Padgett & Henwood, 2012; Tyler & Melander, 2015).

Although a small number of participants asserted that substance abuse issues and homelessness were personal choices, the majority of the participants seemed to be the victims of their immediate circumstances, such as family dysfunction, or maltreatment and abuse by caregivers, as well as by broader structural issues, including their involvement with the child welfare system, colonization, or lack of affordable housing. Considering that the major goal of the child welfare system is to protect children and adolescents against real or potential harm, maltreatment, and abuse and to work in their best interest (Canadian Association of Social Workers, 2005), a large number of participants expressed discontent and outright contempt towards the system, which had unintentionally placed them in situations of perceived greater harm and abuse. In addition, colonizing policies and their intergenerational impacts compounded the adversities facing the participants. Thus both structural factors and personal vulnerabilities created interconnected cycles of homelessness, family separation, and mental health and/or substance abuse in the lives of participants.

### **Limitations of the Study**

The above findings should be cautiously interpreted in light of limitations of this study. Firstly, the sample was selected on the basis of a set of criteria which restricted participation to English speaking individuals. Hence, the sample did not reflect the linguistic diversity of Northern Ontario; particularly, Francophone people may have been underrepresented. Secondly, despite extensive efforts, we were unable to recruit more than three female participants within the given timeframe of the study. Some of the possible reasons given by the service providers included incarceration or hospitalization of homeless women who met the sampling criteria. Future research can address the above limitations and include more diverse subgroups of participants. Also, future research should explore the resilience and strengths among homeless persons, an aspect of homelessness that we have not focused on in the present paper.

### **Implications for Multi-Sectoral Social Services**

Our findings have particular relevance and implications for policy and program development in the domains of child welfare system, housing and homelessness services, and mental health and addictions services. Within the child welfare system, we think it is imperative to examine and address the root causes of intergenerational cycle of placement in care, in particular among Indigenous people. This may require critical examination of the historical and current policies and practices that place Indigenous families and children in disadvantageous position within the child welfare system. Furthermore, this may require incorporation of Indigenous worldviews and traditional practices in policy and program development, and greater focus upon enhancing family functioning and stability in children's lives. Such initiatives may minimize the need for the removal of a child from the family and community of origin, reduce repeated placements within multiple foster and group homes, and remove the geographic, infrastructure and economic barriers so that children, in particular indigenous children, can retain connections with their families, communities, culture, language and traditions.

One of the alarming findings pertains to the early onset of addictions and substance abuse among participants. This may require policies and programs aimed at early intervention and prevention within First Nations and other communities across northern Ontario. Also, this may require incorporation of Indigenous worldview and healing practices. Within the domain of homelessness and housing services, it is necessary to focus upon the structural issues faced by different northern communities. These issues include substandard and overcrowded housing in remote First Nation communities and a lack of a continuum of affordable housing options in the rural and urban communities of northern Ontario. In addition, prevention of homelessness among migrant Indigenous people can be achieved through better coordination and communication among service providers across First Nations and urban communities of northern Ontario.

The findings make it apparent that the issue of homelessness goes beyond the provision of

affordable and suitable housing, since homeless persons have complex life trajectories and multiple needs. For instance, youth aging out of care require continuous and seamless provision of life skills training, mental health services, as well as such supports as affordable housing, so that they can live independently in the community. In particular, this may require inter-sectoral collaborations to create policies and programs that allow establishment of a continuum of housing options that might include integrated mental health and addictions services and life skills training support. In addition, this may also require an integrated approach to policy and program development at different levels of government, along with the inclusion of Indigenous people in the planning and service delivery processes across homelessness and housing, child and youth welfare, and mental health care sectors.

## Acknowledgments

The authors would like to acknowledge the support for data transcription from the Poverty, Homelessness and Migration research team at the Centre for Research in Social Justice and Policy, Laurentian University.

## Disclosure statement

No potential conflict of interest was reported by the authors.

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