Unaccompanied Homeless Youth Access to SNAP

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Executive Summary

*Unaccompanied youth find themselves at an intersection of homelessness and hunger.*

When we think of SNAP recipients, we typically think of adults - men, women - and maybe their families. Some might think of the children who benefit from the food stamps that their families receive. It is doubtful, however, that many people would think of an adolescent, someone under the age of 18, who is homeless, and living without the legal protections of a parent or guardian, as being a SNAP recipient, or even eligible to apply. However, federal SNAP regulations specify that unaccompanied homeless youth are in fact eligible to apply for SNAP, and that applying does not require photo identification, proof of a permanent address, approval by a parent or guardian, nor does it, in the case of youth living independently, place age restrictions on applicants. Despite their eligibility for receiving SNAP benefits, and even though the USDA issued a memorandum in May 2013 to regional SNAP offices in which the eligibility regulations were clarified, there remain significant barriers to unaccompanied homeless youth accessing SNAP.

The purpose of this report is to provide an in depth look into the UHY population and the barriers they face in accessing SNAP, as well as to provide recommended next step to address these barriers at the local, state, and federal levels. The main parts of this report include a review of existing literature and relevant policies, information gathered from a survey in which individuals working with homeless youth indicate their familiarity with youth SNAP eligibility in addition to barriers they have observed, and proposed recommendations and next steps to help address the identified barriers.

The main barrier found to inhibit unaccompanied homeless youth access to SNAP is the lack of awareness of the fact that this population is in fact eligible to apply for SNAP, reflecting a lack of clarity around SNAP rules and regulations. Additional, intentional outreach must be done to make this information more widely known, so that the individuals and organizations serving homeless youth are better equipped to assist and empower them towards success.
Introduction

Who are Unaccompanied Homeless Youth?

According to the National Association for the Education of Homeless Children and Youth, an unaccompanied homeless youth (UHY) is a person under the age of 18 "experiencing homelessness and not in the physical custody of a parent or legal guardian," (Julianelle & Duffield, 2013). The McKinney-Vento Homeless Assistance Act of 2011 defines homeless as lacking "a fixed, regular, and adequate nighttime residence," which includes children and youth who are sharing housing, living in motels, hotels, vehicles, camping, trailer parks, or shelters (THEO, "Homeless Education"). These youth may have been kicked out of a parent or guardian's home, run away, or otherwise find themselves outside of the physical care of adults. This lack of a parent or guardian to act on their behalf places limitations on their legal rights, creating a burden and a struggle for unaccompanied youth in accessing services, ultimately impacting their ability to be successful and survive on their own.

It is important to note that not all homeless youth are unaccompanied by a parent or legal guardian. Unaccompanied status is typically assigned by someone within the school that the youth is attending, such as a case worker, social worker, or counselor, who has the opportunity to learn more about a student's situation. School districts that are receiving funds through the McKinney-Vento Act, legislation which provides funding to ensure the educational rights of homeless children and youth (see Relevant Policies and Legislation), must identify unaccompanied youth enrolled at their schools, and share that information with the U.S. Department of Education (Julianelle & Duffield, 2013). While it is the duty of the local McKinney-Vento liaison to identify homeless children and youth, it is advised that the liaisons provide information about homelessness to school staff and personnel, so that these individuals can assist in the identification of homeless students, in order to better and more efficiently sign up eligible students to receive free school meals and access other programs.
Youth may become homeless and unaccompanied for a variety of reasons, typically reflecting struggles at home. Adolescents may leave a household if they are experiencing abuse or neglect. Studies have estimated that between 20 and 40 percent of unaccompanied youth have experienced sexual abuse, and 40 to 60 percent have experienced physical abuse (NAEHCY, "Unaccompanied Homeless Youth"). More than two thirds of callers to the National Runaway Switchboard reported that at least one of their parents abused drugs or alcohol. In addition, 48 percent of youth on the street have been pregnant or impregnated someone, and 10 percent of homeless female youth are pregnant. It is important to note that youth who identify as LGBTQ are more likely to be thrown out or leave their homes than heterosexual youth, as 20 to 40 percent of runaway youth identify as LGBTQ.

**Homeless Youth Count**

While it is important to understand the reasons for youth homelessness, it is also imperative to have an accurate count of how many homeless and unaccompanied youth there are, at least at the state and national levels. Having an accurate count of this population allows organizations to be able to measure progress and the success of efforts made to end youth homelessness. Such figures can also be used to convince legislators to take action in support of policy and funding initiatives that better the lives of unaccompanied and homeless youth. Organizations and government entities may provide data and report estimates of homeless youth, but inconsistencies arise as different groups and organizations use different definitions of "homeless," collect and report data on specific age groupings, or use varying data collection methods, resulting in widely different figures. For example, a 2002 report from the Office of Juvenile Justice and Delinquency Prevention indicated that there were 1.7 million homeless youth, while a 2009 report from the National Alliance to End Homelessness estimated there to be 110,000 "street youth" (Pergamit, Cunningham, Burt, Lee, Howell, & Bertumen, 2013). Additionally, schools are the only national institution legally responsible for identifying and providing services for homeless youth (Bassuk, Murphy, Coupe, Kenney, & Beach, 2011), which suggests that the existing counts are severe underestimates on the actual number of this "hidden population" within America (Pergamit, Cunningham, Burt, Lee, Howell, & Bertumen, 2013, p. 5).

The most recent report from the National Center for Homeless Education put the total number of homeless youth in the United States, during the 2011-2012 school year, at 1,168,354 students enrolled (National Center for Homeless Education, 2014). Of these students, 32 percent are located within school districts without McKinney-Vento subgrants, and 68 percent are located within school districts that do have McKinney-
Vento subgrants. In Texas, the counts for total number of enrolled homeless students in the 09-10, 10-11, and 11-12 school years are 76,095, 85,155, and 94,624 respectively, or an average 8.1 percent of the total number of enrolled homeless youth nationally. This puts Texas, alongside New York (8.3 percent in 11-12) and California (21.3 percent in 11-12), as one of the states with the highest number of homeless youth. Additionally, data received directly from the Texas Education Agency in 2014 put the count of homeless youth within the school districts during the 13-14 year at 62,814, which is significantly less than the 94,624 reported through the National Center for Homeless Education (2014).

Data on unaccompanied homeless youth, more specifically, is even harder to find. As reported on the United States Interagency Council on Homelessness website, the Department of Education reported that 52,950 UHY were supported through their school-based programs during the 2008-2009 school year, while HUD had a count of 22,631 youth living on their own through emergency or transitional housing services in 2009. The lack of accurate, available information about the number of homeless and unaccompanied youth reflects the difficulty workers have in being able to effectively access, assess, and serve this population. If the size of the population is not known, it makes it hard to measure the degree to which progress is being made towards ending homelessness in America.

**UHY, Hunger and SNAP**

The challenges that unaccompanied youth often face are many, and yet the 2013 Youth Count! Process Study shared that "unaccompanied youth underuse services because of perceived restrictive rules," (p. 5). It is widely known that in order to perform and be successful in school, children and youth require adequate nutrition each day. The National Center on Family Homelessness reported that homeless children and youth experience hunger twice as frequently as other children, highlighting the importance of federal nutrition programs such as school breakfast, lunch, as well as after school and summer meals (2011). Another federal nutrition program that may be accessed directly by homeless youth is the Supplemental Nutrition Assistance Program, or SNAP.

As previously mentioned, there are a number of misconceptions about youth SNAP eligibility. Federal SNAP regulations issued by the US Department of Agriculture Food and Nutrition Services specify the following information relevant to homeless youth:
• **Applying for SNAP does not require photographic identification.** SNAP is "flexible in what documents are required to verify an applicant's identity," including a drivers license, school ID, work ID, ID card for health benefits or other social service program, voter registration, birth certificate, pay stubs, or any other document that can "reasonably establish the applicant's identity," (USDA, 2013).

• **Applying for SNAP does not require a permanent address.** In addition, homeless households are exempt from the requirement of verifying residency. Homeless individuals applying for SNAP may use any of a variety of addresses, such as that of an authorized representative, a shelter, school, or local SNAP office.

• **Youth who are not living with their parents or legal guardians are eligible to apply independently, regardless of age.** While SNAP regulations state that someone under the age of 22 living with their parents must apply for SNAP as a part of the same household, regardless of whether or not they purchase and prepare food together, additional regulations provide exception to this, stating that "anyone who...is considered an individual living alone should be afforded the opportunity to apply as a one person household."

• **Applying for SNAP does not require the signature or presence of a parent or guardian.** Youth can apply independently or with the assistance of another individual.

*Additional clarifications on SNAP regulations relevant to unaccompanied youth can be found in the Myths and Facts Sheet, located in Appendix A.*
Relevant Policies and Legislation

USDA, SNAP Clarification of Policy Barriers Facing Homeless Youth, 2013

In May 2013, the Food and Nutrition Service at the United States Department of Agriculture issued a memorandum to all SNAP regional directors, with the purpose of clarifying SNAP eligibility for homeless youth. The memo was issued "based on reports from FNS Regional Offices and non-governmental and community based partners" about identified, "common policy misconceptions relevant to homeless youth applying for SNAP," (USDA, 2013).

The memo addressed the following misconceptions:

a) that photographic identification is required to apply for SNAP

b) that SNAP applicants must have a permanent address to apply for SNAP

c) that there is an age requirement for applying to SNAP, including regulations for youth who may be living temporarily with residents of another household
California AB 309, 2013

The governor of California signed into law Assembly Bill 309, addressing CalFresh (what SNAP is called in California) benefits for homeless youth (NAEHCY, "2013 CA Legislative Bills"). The purpose of the bill is to clarify some of the SNAP requirements, such as the fact that there is no minimum age requirement for unaccompanied homeless youth in applying for SNAP. In addition, the bill requires county welfare departments, the department that processes CalFresh applications, to a) individually evaluate an unaccompanied youth's application to determine if the youth should be applying as an individual or with the household of current residence, b) promote awareness of CalFresh expedited services for homeless individuals, through making sure liaisons at educational agencies and homeless shelters receive specific training about CalFresh services, and c) provide the individual with a written explanation of why their application was denied, should that occur. AB 309 was signed by the Governor in August 2013 (California Legislative Information).

McKinney-Vento Homeless Education Assistance Improvements Act of 2001

The McKinney-Vento Act of 2001 was created to ensure the educational rights of children and youth experiencing homelessness (Texas Homeless Education Office, 2005). It emphasizes that homeless children and youth should have access to educational and "other services" that they need to meet academic standards, and establishes the provision of state and local grants for educational agencies to uphold these standards (U.S. Department of Education, 2004). The Act provides a definition of "homeless children and youth" as well as a definition for "unaccompanied youth," which is used by many organizations. McKinney-Vento addresses a variety of topics including academic achievement, school selection, enrollment, dispute resolution, transportation, the establishment and requirements for school district liaisons, segregation, local subgrants, statewide activities, federal activities, and funding (Texas Homeless Education Office, "The McKinney-Vento Act").

Runaway and Homeless Youth Act

The RHYA authorizes funding for the federal Runaway and Homeless Youth Program, which is administered by the Family and Youth Services Bureau of the Department of Health and Human Services (National Center for Homeless Education, 2012). Funds through the RHYA are given to agencies that provide outreach and housing solutions specifically for unaccompanied, runaway and homeless youth.
Unaccompanied Youth SNAP Access Survey

While in May 2013 the U.S. Department of Agriculture issued a policy clarification around youth SNAP eligibility, it remained unclear how familiar individuals working with homeless youth were with the specific eligibility requirements. In order to gain more insight about familiarity with youth SNAP eligibility, as well as identify potential barriers to youth SNAP access, a survey was created in collaboration with the Texas Homeless Education Office and the National Association for the Education of Homeless Children and Youth. The survey, accessible through SurveyMonkey, was distributed through the Texas Homeless Network via email, and was available for participants to respond during two weeks in March 2014. 161 individuals took the survey.

Results

Complete survey results, including tables and graphics, can be found in Appendix E. Additionally, an online infographic of the survey results can be found at: https://infogr.am/unaccompanied-youth-snap-access-survey. Main survey findings include:

- 62.73% of participants were aware that youth under 18 are potentially eligible to apply for SNAP; 37.27% were not aware
- While 26.09% of participants had received information and 1.86% received training clarifying the policies around unaccompanied youth eligibility for SNAP, 63.98% had received neither information nor training
- When asked to rate their familiarity with unaccompanied youth SNAP eligibility, 8.07% said "very familiar," while 45.96% said "somewhat familiar" and 45.96% replied "not at all familiar"
- 32.92% had referred one or more unaccompanied youth to apply for SNAP
- 10.63% had assisted one or more unaccompanied youth in completing the online SNAP application
- 32.35% identified the biggest barrier to unaccompanied youth access to SNAP as the "inability to apply due to youth being under a previous parent or guardian's SNAP account
Barriers and Recommendations

The results of the March 2014 survey helped to shed light on some of the barriers that exist regarding unaccompanied homeless youth access to SNAP. In addition to the survey, analysis of relevant policies, conversations with individuals working with this population, and interviews with a few unaccompanied youth at various stages in the SNAP application process, have all contributed to the formation of recommendations for how to increase unaccompanied homeless youth access to SNAP.

Efforts must be made to address these barriers and find solutions through a variety of avenues, including state and national policy action. In their 2010 "America's Youngest Outcasts State Report Card on Child Homelessness," the National Center on Family Homelessness placed Texas in the lowest ten scoring states regarding policy and planning efforts to address child homelessness, in addition to being one of the ten most at-risk states, (Bassuk, Murphy, Coupe, Kenney, & Beach, 2011). Based on a composite score which looked at, a) the extent of child homelessness, b) child well-being, c) risk for child homelessness, and d) state policy and planning efforts, Texas ranked 38th (where 1 equals the best and 50 equals the worst). There are a number of steps that individuals, groups, and organizations throughout the state and around the nation can take to better support this vulnerable population.
There are a variety of roles that social workers and other professionals can take in addressing these barriers, with work to be done at micro, mezzo, and macro levels, in order to achieve sustainable systems change. Recommendations for actions individuals, groups and organizations can take to address youth SNAP access will be categorized into the following three groups:

**LOCAL**

- Steps to be taken by individuals, groups, and organizations to address this issue locally

**STATE**

- Steps to be taken by individuals, groups, and organizations to address this issue statewide or at the state policy level

**FEDERAL**

- Steps to be taken by individuals, groups, and organizations to address this issue at the national level, or actions to be taken by the federal government

A condensed, one page chart of the barriers and recommendations can be found in Appendix B.

*Presented next are four main barriers to unaccompanied homeless youth SNAP access, and proposed recommendations for how to address these barriers at the local, state, and federal levels, through policy, research, education, outreach and development.*
Barrier 1) Lack of awareness of youth eligibility and SNAP regulations

The biggest identified barrier to unaccompanied youth SNAP access is that not enough people are very familiar with the rules and regulations around youth SNAP eligibility. A survey gathering information from 161 individuals working with homeless youth in the state of Texas found that only 8 percent would say they are "very familiar" with unaccompanied youth SNAP eligibility, while 46 percent said they were "somewhat familiar," and 46 percent replied "not at all familiar." In addition, 37 percent indicated that they were not aware that youth under the age of 18 are potentially eligible to apply for SNAP (See Appendix E for full results). It is likely that this unfamiliarity with youth SNAP eligibility requirements is the reason why youth may be turned away from applying due to their age, lack of a permanent address, lack of photo identification, and lack of parent or guardian signature.

While the USDA issued a memorandum in May 2013, to regional SNAP offices, clarifying misconceptions about youth SNAP eligibility, it is doubtful that this information was widely disseminated to the point of reaching many of the individual workers and organizations that serve unaccompanied homeless youth. It is essential that this information be widely known among the individuals and organizations working to serve homeless youth, so that they can most effectively assist this population. Organizations such as the Texas Homeless Education Office and the National Association for the Education of Homeless Children and Youth have made available extremely useful resources on this topic, and connecting individuals and local organizations with these existing resources should be a priority.

Barrier 2) Eligible applicants are turned away due to misconceptions about youth SNAP eligibility

A number of additional barriers stem from the first, overarching barrier of lack of familiarity with SNAP regulations. Youth are unfairly turned away from applying for SNAP, although under SNAP regulations they may be eligible. Reasons for being turned away include:

- Youth being turned away due to their age
- Youth being turned away because they are not accompanied by a parent or guardian
- Youth being turned away because they do not have a permanent address
- Youth being turned away because they do not have photo identification
- Youth being turned away because they are still listed under a previous parent or guardian's SNAP account

Increased familiarity with SNAP regulations would certainly help to prevent youth from being turned away from applying for these aforementioned reasons.

**Barrier 3) Lack of available assistance to help youth with the application process**

An additional barrier expressed by individuals working with homeless youth was that there was a lack of available assistance- people to help UHY with the SNAP application process. Homeless youth are dealing with a number of stressors, and it is important that there are informed and engaged individuals to assist and provide them with guidance as they navigate tasks and concerns that typically fall to adults. UHY who have applied for SNAP have shared that they needed help with various stages of the process, such as filling out the application, arranging for the phone interview, and working with the school system to allow the student to miss class in order to visit the SNAP office while it is open during the day. While increasing the number of individuals who have a stronger understanding of unaccompanied homeless youth SNAP eligibility should help to address this barrier, there are additional steps that can be taken to strengthen the assistance this population has available to them.

**Barrier 4) Hesitancy or lack of motivation on the part of the youth to apply**

Homeless liaisons have reported hesitancy and misunderstandings on the part of the unaccompanied homeless youth that they have served. Some youth may believe that if they receive SNAP, they will be taking away from the benefits that their parents, guardians, or family receives, and do not want their loved ones to go without. Additionally, these adolescents may not understand the application process, or see the value in completing the sometimes arduous and time consuming application process. If significant barriers stand in their way, it is only natural that motivation on the part of the youth may wane, and they may see the application process as a greater struggle than the SNAP benefits are worth. Individuals working with unaccompanied homeless youth should keep in mind the many challenges that this population is facing, as well as emphasize the many strengths that these youth possess. Encouraging, educating, and empowering these youth in all aspects of their lives should be a priority.
Recommendations: LOCAL

- Engage in widespread, strategic outreach to disseminate information about youth SNAP eligibility among individuals and organizations working with the homeless population
- Implement employee evaluation measures to promote individual and organizational responsibility for increased staff competence regarding work with homeless youth
- Identify key gatekeepers at local SNAP offices—individuals who are very knowledgeable about youth SNAP eligibility, and able to serve as the go-to contact for unaccompanied youth seeking SNAP services
- Allow SNAP workers to visit schools to assist unaccompanied homeless youth with the SNAP application, as opposed to UHY having to find and contact the SNAP workers outside of school
- Provide homeless youth with objective information about SNAP, the application process, and how SNAP is funded
- Ensure that youth understand the benefits of receiving SNAP
- Individuals working with UHY should consider each case individually, and emphasize the strengths of each individual youth
- Assist youth in planning and figuring out how to use their SNAP benefits, purchase, prepare and store food, and how to budget their SNAP and additional funds
- Increase attempts to identify and access unaccompanied and homeless youth who may not be attending school or receiving services through the school system
- Create a comprehensive, easy to understand resource guide for homeless youth
- Conduct an assets and needs assessment of existing local resources available for homeless youth
- Seek continual guidance and updates about relevant policies and legislation
Recommendations: STATE

- Encourage and advocate for the state of Texas to issue guidance regarding the SNAP regulations and eligibility of unaccompanied homeless youth
- Develop effective outreach materials about youth SNAP eligibility to be widely distributed through statewide organizations
- Create state legislation modeled after California AB 309, requiring welfare agencies and workers to promote awareness of youth SNAP eligibility requirements
- Launch a statewide campaign to increase general awareness about the needs of unaccompanied and homeless youth, and the resources available to them
- Clarify the SNAP application process for youth via the www.yourtexasbenefits.com website, hosted by the Texas Health and Human Services Commission

Recommendations: FEDERAL

- Conduct further research to gain insight into streams of information and communication, to discover the reasons why information about youth SNAP eligibility has not effectively disseminated
- Issue further clarification and ensure that the information is disseminated appropriately
- Increase efforts to eliminate child and youth homelessness
- Advocate for increased and continued support for federal nutrition programs such as SNAP and school meals
- Provide states and organizations with resources and funding to improve homeless youth count efforts
Next Steps and Conclusion

While this report has served to call attention to the barriers and challenges that unaccompanied youth face in applying for and accessing SNAP, as well as proposing some solutions to address the barriers, it is only the beginning. Additional steps should be taken to gather further evidence and provide support for improved efforts at addressing the needs of unaccompanied and homeless children and youth.

- **Conduct focus groups, interviews, or distribute surveys to unaccompanied and homeless youth**, to actively involve them in the process and receive their input in forming plans to address the barriers they experience. *Example interview questions can be found in Appendix F.*
  o For example, conduct a focus group with homeless youth in which a facilitator explores the online SNAP application process and the Your Texas Benefits website with youth. Gather input from participants on the application process, difficulties or challenges with using the website, and create recommendations to present to or share with the USDA on improvements that can be made to improve ease of access for the population.

- **Continue efforts to gather more precise data and produce a more accurate count of the number of homeless and unaccompanied youth in America.** "Better data on youth homelessness will strengthen the ability of agencies to advocate for resources locally and nationally," (Pergamit, Cunningham, Burt, Lee, Howell, Bertumen, 2013, p. 7).

- **Conduct a qualitative and/or quantitative study to explore the impact of receiving SNAP benefits on unaccompanied youth.** In order to provide direct evidence and gather support for funding SNAP and increased SNAP outreach, it would be
beneficial to provide decision makers with evidence for the impact SNAP has on this population in particular.

- **Assess communication channels between federal government entities, state offices, and local organizations**, to determine how information issued at the "top" is or is not making its way to the people engaging in direct practice with the populations intended to be served. The federal government issuing memorandums and policy clarifications is only impactful if the information is getting to the people carrying out and acting upon these policies at the state and local levels. An assessment of information dissemination would reveal gaps in vertical and horizontal communication flow, as well as highlight effective methods of information sharing.

- **Connect this specific issue more widely to organizations and policies that address related issues such as homelessness, education, food insecurity, and health.** When "fewer than one quarter of homeless youth in America graduate from high school," it is not a stretch to connect efforts addressing youth access to nutritious food to graduation rates (Pergamit et al., 2013).

- **Continue to advocate for policies and legislation that support this vulnerable population.**

- **Work to strengthen families and address the root causes of youth homelessness.** Identifying and providing solutions to problems and situations that lead to youth becoming homeless serves to address the issues associated with youth homelessness before they begin.
Ask the question- what happens after an unaccompanied youth gets approved for and receives SNAP benefits? UHY completing the SNAP application process is only the beginning, and does not fully address their food security needs. There are a number of concerns to address regarding what happens once an unaccompanied minor gains access to SNAP, such as whether UHY know how to budget their SNAP benefits, how to shop for and prepare nutritious food, and even whether homeless youth have resources and a place to store food.

Together we can work to ensure that this vulnerable population has access to the nutritious foods, life skills, and the resources they need to grow into active, successful, and engaged adults.
References


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Appendix

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