

NASPAAS Core Competency: Policy Process

Public Policy Failure and Lessons Learned

Deirdre M. Bassin

School of Public Affairs and Administration, Rutgers University

MPA Capstone Project

Weiwei Lin, PhD

Summer 2025

MEMO

To: Representative [REDACTED]
Senator [REDACTED]
Senator [REDACTED]

From: Deirdre M. Bassin

Date: April 20, 2024

Re: U. S. Federal Public Policy Failure Assessing the Homelessness Epidemic

I am a concerned life-long resident of [REDACTED] and am deeply concerned about the plight of individuals facing homelessness in our nation today. The purpose of this memo is to inform you of the pitfalls of the U.S. Department of Housing and Urban Development's (HUD's) methodology of assessing homelessness. HUD's current policy is failing our country's most vulnerable residents. Below you will find explanations of this public policy failure's manifestations and the lessons we can learn.

According to the U.S. Administration for Children and Families, the strict HUD definition undercounts the number of homeless persons in the United States. The HUD definition does not include individuals who are "doubling-up" as homeless. Yet, many other Federal agencies, such as the Administration for Children and Families, adopt the more inclusive definition of the McKinney-Vento Homeless Assistance Act. This Act employs a broader, more inclusive definition of homelessness that acknowledges the precarious and most often dangerous situation of individuals and families whose only source of housing is "doubling-up." Doubling-up in this sense is defined as individuals or families who stay in the homes of friends or relatives that they would otherwise not choose to live with.

The manifestations of this HUD's flawed methodology of assessing homelessness in our country are two-fold: (1) the gross undercounting of homelessness in our country and (2) the massive misconception of most of America that our homelessness problem is not as dire as it is.

Data shows the number of homeless individuals is drastically lowered when you exclude persons who are “doubling-up.” According to a study published by the Poverty Solutions at Michigan State University, during the school year 2020-2021, 25.9% of New Jersey students experiencing homelessness identified as staying in a motel or staying in a shelter. Meanwhile 73.8% of New Jersey students experienced homelessness identified as “doubled up.” According to the McKinney-Vento Homeless Assistance Act, all these students and their families would qualify for assistance, but according to HUD, the 73.8% are not even considered homeless.

In the County of [REDACTED], the Department of Human Services has unfortunately learned firsthand that we cannot rely on assessing the number of homeless individuals with HUD’s definition. As indicated by the United States Interagency Council on Homelessness, most of the homeless assistance funding in the United States flows through HUD and we are missing the mark in more ways than one. We have learned that more funding and more support is needed than is currently afforded to us in the State of [REDACTED].

The second manifestation of this public policy failure can be witnessed in the overconfidence of most Americans who are not homeless believe that the situation is not as bad as it actually is. From this policy failure, we learn that most of the U.S. does not see this hidden epidemic. Additionally, we learn how federal public policy failures steer public opinion. Whether a political agenda comes into play here in “covering up” how many homeless we have in this country, or if there is an innocent miscalculation, is not a debate I wish to get into. The lesson is clearly learned: if HUD’s numbers do not reflect the number of individuals that are homeless, the public will not have a clear understanding of the need. Thus, Americans naturally will not support policies to correct a problem which they think does not exist.

To fail is to be human; failure is nothing to be ashamed about, but failing to learn from failure is shameful. I implore you, as a constituent and fellow civil servant, to consider the above information regarding this public policy failure in the policies you create and support going forward.

References

- Blankenship, G. *The issues that arise when federal agencies define child homelessness differently.* <https://www.npr.org/2023/02/14/1156723305/the-issues-that-arise-when-federal-agencies-define-child-homelessness-differentl>. Retrieved April 14, 2024, from <https://www.npr.org/2023/02/14/1156723305/the-issues-that-arise-when-federal-agencies-define-child-homelessness-differentl>
- Definitions of homelessness for federal program serving children, youth, and families.* <https://www.acf.hhs.gov/>. Retrieved April 14, 2024, from https://www.acf.hhs.gov/sites/default/files/documents/ecd/homelessness_definition.pdf#:~:text=The%20two%20major%20definitions%20of%20homelessness%20in%20use,103%20of%20Subtitle%20I%20of%20the%20McKinney-Vento%20Act.
- Homeless emergency assistance and rapid transition to housing (HEARTH): Defining homeless final rule.* Retrieved Apr 20, 2024, from <https://www.hudexchange.info/resource/1928/hearth-defining-homeless-final-rule>
- HUD 2023 continuum of care homeless assistance programs homeless populations and subpopulations.* (). https://files.hudexchange.info/reports/published/CoC_PopSub_State_NJ_2023.pdf
- Lee, L. (2023a, -12-19T00:00:37+00:00). *Hidden homelessness in the U.S.: Why congress must change HUD's definition of homelessness to align with other federal agencies.* School House Connection. Retrieved Apr 14, 2024, from <https://schoolhouseconnection.org/aligning-homelessness-definitions/>
- Lee, L. (2023b, -12-18T04:58:23+00:00). *New HUD data show dramatic increase in families and youth in homeless shelters, even while significantly undercounting families and youth*

experiencing homelessness. School House Connection. Retrieved Apr 14, 2024,
from <https://schoolhouseconnection.org/2023-hud-data/>

McKinney-Vento – national center for homeless education. Retrieved Apr 21, 2024,
from <https://ncche.ed.gov/legislation/mckinney-vento/>

Opinion:| how many Americans are homeless? No one knows -The New York Times.
<https://www.nytimes.com/2021/01/28/opinion/homeless-america-data.html>

H.R.5221 - 118th congress (2023-2024): Homeless children and youth act of 2023,
(2023). <https://www.congress.gov/bill/118th-congress/house-bill/5221>

Targeted federal homelessness funding: How the president's 2025 budget compares. Retrieved
Apr 15, 2024, from
<https://www.usich.gov/sites/default/files/document/FY%202025%20Proposed%20Federal%20Budget%20for%20Homelessness.pdf>

*Understanding the federal definition of
homelessness.* <https://childcareta.acf.hhs.gov/>. Retrieved Apr 14, 2024,
from <https://childcareta.acf.hhs.gov/sites/default/files/understanding-federal-definitions-508.pdf>

Why this widespread form of homelessness is often overlooked and unsupported. (2023, -11-
20T16:52:12-04:00). PBS News Hour. Retrieved Apr 21, 2024,
from <https://www.pbs.org/newshour/nation/why-this-widespread-form-of-homelessness-is-often-overlooked-and-unsupported>

Workbook: National_State_Local_Child_and_Youth_Homelessness_Data_Profiles. Retrieved
Apr 14, 2024, from https://tableau.dsc.umich.edu/t/UM-Public/views/National_State_Local_Child_and_Youth_Homelessness_Data_Profiles/Nation

[alStateLocalstory?%3Adisplay_count=n&%3Aembed=y&%3AisGuestRedirectFromVizportal=y&%3Aorigin=viz_share_link&%3AshowAppBanner=false&%3AshowVizHome=n](#)