

## Housing and School Partnership on the Point-In-Time Count

### About the Point-In-Time Count

The Point-in-Time (PIT) count is an annual count of people experiencing homelessness on a single night in the last 10 days in January. The U.S. Department of Housing and Urban Development (HUD) requires its [Continuum of Care \(CoC\) grantees](#) to conduct an annual count of sheltered homeless persons. CoCs also must conduct a count of unsheltered homeless persons every other year (odd numbered years).<sup>i</sup> Each count is planned, coordinated, and carried out locally by service providers and trained volunteers.

### The Importance of Data

In its [Home Together: Federal Strategic Plan to Prevent and End Homelessness](#), the U.S. Interagency Council on Homelessness (USICH) underscores the importance of collecting, reporting, and analyzing high-quality, timely data on homelessness, and leveraging a variety of data sets to plan, target, and scale needed housing and service interventions. Important sources of data on homelessness in the United States include

- [Education for Homeless Children and Youth \(EHCY\) program data](#);
- HUD [Point-In-Time count](#) (AHAR Part 1), [Homeless Management Information System](#) (HMIS; AHAR Part 2), and [Worst Case Housing Needs data](#);
- [Runaway and Homeless Youth Act grantee \(RHY-HMIS\) data](#);
- U.S. Census Bureau [American Housing Survey \(AHS\) data](#); and
- other relevant data sources, as appropriate to the specific federal, state, or local context.

Each source provides unique insights; as such, the most accurate and complete picture of family and youth homelessness can be developed only when considering all of these sources. CoCs and schools are encouraged to work together to share and leverage their respective data sets, in accordance with applicable law, by referencing each other's numbers in reports and public talking points, as appropriate, and using multiple sources of data to inform local efforts to serve families and youth.

### Statutory Guidelines under PPRA and FERPA

The two key pieces of federal legislation that guide how local educational agencies (LEAs) and schools may engage in PIT count planning and implementation are the [Protection of Pupil Rights Amendment \(PPRA\)](#) and the [Family Educational Rights and Privacy Act \(FERPA\)](#). PPRA addresses the administration of surveys, while FERPA addresses the sharing of personally identifiable information (PII) about students with third parties.

**Survey administration under PPRA:** PPRA [20 U.S.C. § 1232h(c)] requires LEAs to develop and adopt policies, in consultation with parents, regarding

- the right of a parent of a student to inspect, upon request, a survey created by a third party before the survey is administered or distributed by a school to a student;
- any applicable procedures for granting a request by a parent for reasonable access to such survey within a reasonable period of time after the request is received;
- arrangements to protect student privacy that are provided by the agency in the event of the administration or distribution of a survey to a student containing certain protected categories of information; and
- offering an opportunity for the parent to opt the student out of participation in such surveys.

The rights provided to parents under PPRA transfer to the student when the student turns 18 years old or is an emancipated minor [20 U.S.C. § 1232h(c)(5)(B)].

**Information-sharing under FERPA:** FERPA generally prohibits LEAs and schools that receive funds under any program administered by the U.S. Department of Education from disclosing student education records, and the personally identifiable information (PII) contained therein, without the prior written consent of a parent [20 U.S.C. § 1232g(b)]

or eligible student [20 U.S.C. § 1232g(d)]. *Eligible student* is defined as a student who has reached 18 years of age or is attending an institution of postsecondary education (34 C.F.R. § 99.30).

These PPRA and FERPA guidelines make the broad and systematic administration of PIT count surveys in schools difficult. Obtaining parental consent, as applicable, for students experiencing homelessness with their families could be feasible, albeit potentially time-consuming; while obtaining parental consent for unaccompanied minors experiencing homelessness could be challenging, given the strained relationship that may exist between these youth and their parents. As such, schools will want to weigh whether sticking to the suggested planning and awareness-building strategies below may be the most sensible approach to supporting their local PIT count.

### School-CoC PIT Count Collaboration

In its [Point-in-Time Count Methodology Guide](#), HUD encourages CoCs to involve a variety of community partners to help plan and execute the PIT count; local homeless education liaisons (local liaisons) and family and youth service providers are named specifically as important partners given their experience in reaching and serving families and youth experiencing homelessness. To ensure compliance with the above PPRA and FERPA guidelines, schools and LEAs can support CoC PIT count efforts in the following ways:

**Planning:** School and LEA involvement in PIT count planning can provide valuable insights into and help with

- selecting family- and youth-friendly count sites, and creating a welcoming environment there;
- selecting family- and youth- friendly incentives<sup>ii</sup> for count participation;
- recruiting PIT count volunteers; and
- suggesting other local family and youth service providers to assist with the count.

Local liaisons and other school personnel may wish to volunteer to administer PIT count surveys to families and youth experiencing homelessness, provided that survey administration is conducted off school premises and during non-work hours.

**Awareness-building:** Schools and LEAs can help get the word out about the PIT count by

- posting youth- and family-friendly information about the count throughout schools. The information should communicate who the target population is (in this case, children, youth, and families experiencing homelessness under the HUD definition), how/where/when to participate in the count, and what the incentives are for participation. It is worth noting that many CoCs provide an option to complete the PIT count survey online; and
- having local liaisons and/or other school personnel inform families and youth identified as homeless about the count and the possible benefits of participation.

### Getting Started

The first step in PIT count collaboration is to connect with your housing or education partner. To locate the CoC in your area, visit <https://www.hudexchange.info/grantees/>. To locate the local liaison(s) in your area, visit your [State homeless education webpage](#). Contact should be made early to ensure sufficient time for effective planning and implementation.

### For More Information

For more information on planning an effective and youth-friendly PIT count,

- download Voices of Youth Count's [Conducting a Youth Count: A Toolkit](#).
- download HUD's [Point-in-Time Count Planning Worksheet](#).

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<sup>i</sup> While only required by HUD during odd years, many CoCs conduct an unsheltered count every year.

<sup>ii</sup> Many CoCs provide incentives to homeless people who participate in the PIT count. Incentives may include transit passes, meal gift cards, toiletries, backpacks, blankets, and items of clothing.