

Two Federal Definitions of Youth Homelessness: How Regulatory Design Shapes Eligibility for Housing Assistance

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Abstract

Two federal agencies count homeless youth using different definitions, and the resulting figures diverge by roughly a factor of forty. On a single night in January 2025, the Department of Housing and Urban Development identified 35,159 unaccompanied homeless youth nationwide. Over the 2023-24 school year, the Department of Education identified 1,548,191 homeless children and youth under the McKinney-Vento Act, about three-quarters of them doubled up in someone else's home rather than in a shelter or on the street. That gap is best read as a matter of regulatory design rather than measurement error. HUD's definition of homelessness, at 24 CFR 578.3, excludes the doubled-up and economic-hardship categories that McKinney-Vento explicitly includes at 42 U.S.C. § 11434a. Federal housing assistance follows HUD's narrower definition. Continuum of Care funding is allocated using HUD's count, and the Youth Homelessness Demonstration Program limits assistance to doubled-up youth to ten percent of a community's award. That arrangement rests on the statutory language, on the funding formula that gives the narrower definition its practical force, and on the repeated failure of the Homeless Children and Youth Act, reintroduced in the current Congress as S.1667 and H.R.6403, to align the two definitions despite bipartisan sponsorship. That record lines up with the existing empirical literature, particularly a 2022 study finding that a third of students identified as homeless in HUD's own housing records went unrecognized by their schools. Maintaining two incompatible federal definitions has let Congress ration eligibility without having to legislate the rationing directly.

Keywords: youth homelessness, McKinney-Vento Act, HUD, Continuum of Care, homelessness definitions