



**EDUCATION  
LAW CENTER**

**Identifying Solutions to Address Youth Homelessness**  
*Hearing on Students Experiencing Homelessness*  
*Philadelphia City Council*  
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Thank you for this opportunity to testify today. My name is Maura McInerney and I am the Legal Director at the **Education Law Center-PA (“ELC”)**, a statewide nonprofit legal advocacy organization dedicated to ensuring that all Pennsylvania’s children have access to a quality public education. ELC’s work focuses on protecting and advancing the rights of students who are most underserved by our education system, including children experiencing homelessness, those living in poverty, Black and Brown students, children in the foster care and juvenile justice systems, children with disabilities, multilingual learners, LGBTQ+ students, and students at the intersection of these identities. Over our nearly 49-year history, ELC has handled hundreds of individual and impact cases and engaged in legislative and policy reform at all levels on behalf of children experiencing homelessness. These efforts have included filing cases in federal court under the *McKinney-Vento Act Homeless Assistance Act*, 42 US Code §§11431-11435,<sup>1</sup> and advocating for state law reforms such as ensuring that young children experiencing homelessness are appropriately screened and tracked to determine eligibility for early

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<sup>1</sup> See e.g., *L.R. ex rel. G.R. v. Steelton-Highspire Sch. Dist.*, No. 1:10-CV-00468, 2010 WL 1433146 (M.D. Pa. Apr. 7, 2010) (granting preliminary injunction directing school district to re-enroll child under the McKinney-Vento Act in case where the middle schooler had missed over six months of school); *N.C. v. Easton Area School District*, No. 5:13-CV-07199 (E.D. Pa. Jan. 6, 2014) (ordering immediate re-enrollment of two students who were disenrolled after being improperly classified as ineligible for McKinney-Vento protections because they lived in a recreational camper outside the catchment of the school district).

intervention services<sup>2</sup> and that students in the K-12 system who experience education instability due to homelessness receive targeted supports to graduate with their peers.<sup>3</sup>

My testimony today stems from ELC’s decades of experience learning about the educational needs of children experiencing homelessness and potential solutions to end youth homelessness. Today, I highlight key recommendations and strategies to both reduce youth homelessness and improve support for students experiencing homelessness. To develop effective strategies, it is imperative to recognize that children and youth become and remain homeless for different reasons – each of which requires us to craft different approaches, responses and solutions. Utilizing this framework, my recommendations focus on four cohorts of students: (1) older youth, including those aging out of foster care and into homelessness; (2) unaccompanied immigrant youth; (3) children and youth living in shelters and (4) students living doubled up with others or who are in inadequate housing – who we often call “the invisible homeless.” Sometimes these students are never identified by schools. My recommendations are drawn from other jurisdictions and share a common theme underlying their success: schools must partner with a wide array of community-based and city organizations, including shelters, food banks, and medical and mental health providers, and city agencies, such as local housing authorities, child welfare agencies, etc. to identify and connect students experiencing homelessness to critical services. Building that infrastructure is an important first step for each of the recommendations I outline today.

## **I. Solutions and Model Programs**

### **For older youth, including those aging out of foster care and into homelessness we must:**

- Expand availability of youth-focused housing, particularly Independent Living or IL transitional housing.
- Develop more detailed 90-day discharge plans that includes specific housing.
- Equip older youth with additional skills for living on their own including financial literacy, job ready skills, organizational skills, etc.

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<sup>2</sup> 55 Pa. Code § 4226.25.

<sup>3</sup> See Act 1 of 2022, 24 P.S. § 13-1331.1, which removes educational and graduation barriers for students who experience “education instability” due to homelessness, foster care, involvement in the juvenile justice.

According to the 2017 Voices of Youth Count, nearly one-third of older youth identified as homeless in a national point-in-time count had been in foster care or the juvenile justice system.<sup>4</sup> Peer-reviewed research indicates that between 31% and 46% of youth exiting foster care experience homelessness by age 26.<sup>5</sup> In fact, one of the more significant contributors to homelessness is spending time in the foster care system.

### **Program Examples:**

#### **Expand youth-focused housing, particularly Independent Living**

- California's [Transitional Housing Programs for Current or Former Youth in Foster Care](#) is a state-funded program available in all counties whereby youth receive transitional housing and services for up to 24 months. There are three programs.
  - *Transitional Housing Placement Program for Minor Foster Children* (THPP-M) is a type of foster care placement for minors between the ages of 16 and 18. The goal is to help participants emancipate successfully by providing a safe environment for youth, while learning skills that can promote self-sufficiency.
  - The *Transitional Housing Placement for Non-Minor Dependent*, provides housing placement options for non-minor dependents in Extended Foster Care. This placement provides transitional housing and supportive services based on a Transitional Independent Living Plan for youth in extended foster care. The goal of this type of placement is to offer supportive services to assist non-minor dependents in developing skills needed to transition to independent living, which may include assistance with meeting educational goals, obtaining

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<sup>4</sup> According to the 2017 *Voices of Youth Count*, nearly one-third of youth identified as homeless in a point-in-time count had been in foster care or the juvenile justice system. See *Voices of Youth Count Report on Youth Homelessness: Findings from the Youth Count, Brief Youth Survey, and Provider Survey Philadelphia* available at <http://www.philadelphiaofficeofhomelessservices.org/wp-content/uploads/2017/04/voices-of-youth-count-philadelphia-9-2017.pdf>. See also *Youth at Risk of Homelessness: Identifying Key Predictive Factors Among Youth Aging Out of Foster Care in Washington State* available at <https://www.dshs.wa.gov/sites/default/files/SESA/rda/documents/research-7-106.pdf>

<sup>5</sup> Amy Dworsky PhD, Laura Napolitano PhD, and Mark Courtney PhD, *Homelessness During the Transition From Foster Care to Adulthood* *American Journal of Public Health* (AJPH) (December 2013), <https://ajph.aphapublications.org/doi/abs/10.2105/AJPH.2013.301455>.

employment, and learning financial management, relationship, and daily living skills

- *Transitional Housing Program-Plus* (THP-Plus) is a transitional housing program for young adults who exited foster care (including those supervised by the Juvenile Probation) on or after their 18th birthday. This program offers housing and supportive services for 36 cumulative months or until the age of 25, whichever comes first.
- Housing options through these programs include having a host family who is approved as a transitional housing provider; a staffed site, and a remote site where a minor lives independently in a single housing unit rented or leased by the housing provider who provides regular supervision.
- North Carolina and Texas have provided opportunities for youth formerly in foster care to receive housing if they continue with their schooling. [North Carolina's NC Reach](#) covers the cost of attendance, including housing, for up to four years at North Carolina public institutions of higher education. Texas now requires state colleges and universities to assist with funding to pay for housing during the summer and winter breaks for youth formerly in foster care.
- [Project Connect in Cincinnati](#) connects youth to a wide array of local agencies, including connecting youth to housing options. This project, offers an eight-week summer academic and enrichment program, tutoring and enrichment opportunities through after-school programs, and help with the college admissions process.
- [Youth Homeless Demonstration Program in Detroit Michigan](#) used a federal funding opportunity through the Department of Housing and Urban Development (HUD) to reduce youth homelessness through a competitive bidding process to support selected award recipients in the development and implementation of a coordinated community approach to provide housing to youth experiencing homelessness up to age 24.

**Equip older youth with additional skills for living on their own including financial literacy, job ready skills, organizational skills, etc.**

- [Baltimore’s program](#) offers technology skills, college preparation, and job skills training, mentorship, and summer camp opportunities where secondary students have the opportunity to earn academic credit; complete seminars and receive mentoring in life skills, employment skills, and college entrance requirements.
- [Philadelphia’s TEEN program](#) is also a model program which hosts workshops on SAT/ACT prep, resume writing, college/technical school applications, interview skills, writing and communication skills, scholarships and financial aid, career exploration and more.

**Second, we must address the unique needs of a growing population of unaccompanied immigrant children and youth.**

The District’s English learner population has [grown by over 66% in recent years](#): from about 12,000 in 2014-15 to nearly 23,000 in 2023-24. Despite this growth, ELC and partner organizations have reported increased barriers to educational success including: delayed enrollments and school assignments, the dismantling of the Multilingual Assessment Center, lack of access to significant and effective language instruction, and only 131 bilingual counseling assistants for over 22,000 students. The District also maintains only two small newcomer programs for 1,032 newly-arrived immigrant students.

**We recommend the following to address the needs of unaccompanied immigrant students:**

- Ensure prompt enrollment and homeless identification by re-instating a centralized hub (MAC) at the district’s main office.
- Expand Newcomer programs based on the geographic areas where these students reside
- Ensure access to high-quality ESOL services and language instruction at all schools
- Provide targeted support such as access to after-school programs, job training and tutoring.

**Program Examples:**

- [Hillsborough County School District in Tampa Florida](#) prioritized applying for Title III federal grants to provide additional migrant service programs for immigrant students, including adding staff reflecting the communities and languages spoken by newly

arriving immigrants. They also partnered with community organizations to help the whole child and connect students to services.

- [Oakland School District](#) maintains a dedicated office for enrollment, expanded their newcomer programming, and used evidence-based practices to update and enhance their current curriculum and instruction for newcomers to develop proficiency and autonomy to access academic English and advanced literacy skills. See [Newcomer Toolkit](#)
- [West Springfield MA](#), When this district experienced the arrival of more immigrants West Springfield Public Schools added ESOL teachers and a family liaison who spoke 5 languages. The liaison went out to where students lived to communicate with families and connect them with school resources.
- [Sante Fe Public Schools developed Adelante](#), a program through which team members work to support students' immediate academic, medical, social service, and housing needs, while simultaneously focusing on their long-term educational trajectories. Team members work to address families' needs with culturally competent, effective, bilingual services.
- [San Juan Unified School District](#) developed staff trainings on establishing a welcoming environment, effectively teaching English language development (ELD), and learning other languages and cultures to enhance family communication. SJUSD also developed specific data sets to monitor attendance, academic progress, course scheduling, and progress towards graduation and aligned resources to support newcomers. The district recognized the need to align resources as well as to sustain community engagement to support newcomers. The district developed student cultural clubs and sports teams to help immigrant students better connect with their peers.
- Recent studies suggest that organized after-school activities are particularly important for students in immigrant families, providing them with additional experiences that contribute to improved academic achievement and psychosocial outcomes and address academic and socioemotional needs by providing homework assistance, enrichment activities, and field trips that supplement classroom learning. See [https://nche.ed.gov/wp-content/uploads/2018/10/imm\\_lia.pdf](https://nche.ed.gov/wp-content/uploads/2018/10/imm_lia.pdf)
- See recommendations from [Kids in Need of Defense \(KIND\)](#) for an overview on how to support unaccompanied immigrant children.

**Third, we need coordinate efforts to address the needs of young children and youth residing in City-operated/DHS contracted shelters.**

- Amend city shelter policies which undermine school stability for youth (e.g., requirement that a child be at a shelter until 7:30 am in order for the family to secure a bed for the next day)

- Designate preschool slots for children experiencing homelessness to prioritize these young learners.
- Provide targeted school services to children in shelters
- Ensure consistent access to early intervention screenings and services for young children

### **Amend shelter policies to support student learning and school stability.**

In our experience, there are city shelters whose rules directly undermine the ability of students to benefit from school stability. For example, we represented a student in high school who was required to be at his shelter for breakfast at 7:30 or his family would lose his housing. He had to take a bus and subway to get to school which took about an hour. As a result, he was unable to arrive at school on time and was penalized with fines and truancy. In another case, a child who was hospitalized for two days where his family stayed with him lost his shelter placement. Many children living in shelters believe they are prohibited from after school programs. All shelter rules should be reviewed to ensure that students are supported to get to school and engage in school activities.

### **Program Examples:**

#### **Prioritize young children for Pre-K slots.**

[Research shows](#) that when a child's earliest years are marked by an increased risk for adverse childhood experiences, including homelessness, this can negatively impact brain development and result in poorer educational outcomes. It is critically important that we expand [access to preschool](#) for these young learners.

- [New York City](#) ensures that children experiencing homelessness fill preschool slots through outreach. The City worked to expand homeless children's participation in early childhood education through an outreach campaign where the Department of Homeless Services and Education Department collaborated to call over 2700 homeless families to inform them about available programs and assist them to process the enrollment of their children.

#### **Provide targeted services to children in shelters.**

- [Baltimore county public schools provide homeless education services](#) to children in shelters including tutoring resources in the shelters as well as offering therapy focused on facilitating increased school attendance and performance.
- [Cincinnati's Project Connect](#) embeds district staffers at youth shelters. They build relationships with family shelters so the shelters notify them of families staying there and they can provide services.

**Ensure consistent access to early intervention screenings and services for young children**

- [Columbus OH](#) uses title 1 funds to support an ECE advocate and parent consultant at local shelters who works to ensure that young children experiencing homelessness are screened for developmental disabilities and are connected to early childhood programs
- [Anchorage, AK](#), used its Title I funding to develop a standardized referral system, in concert with local HS programs, to facilitate the process of connecting children identified as experiencing homelessness with high-quality ECE services. If such a system were web-based, referrals could easily be coordinated with homeless-serving organizations,
- [Newark's program](#) connects young children to early intervention services upon enrollment of older students.

**Finally, we must acknowledge and address the needs of children and youth whose homelessness is too often “invisible” and who are not connected to services, including families living doubled up and those in “inadequate” unstable housing or facing eviction.**

- Use a universal McKinney-Vento Screener to identify children and youth which is non-stigmatizing.
- Require landlords to provide information to families and McKinney-Vento and services available in schools
- Connect students nearing homelessness to additional resources through community schools or community outreach programs.
- Identify families facing eviction and intervene to provide support.

Research shows that student homelessness in our state is grossly under-identified. While Pennsylvania schools identified 10.1 students experiencing homelessness per 100 school-aged



children in poverty, in the nation overall, schools on average identify 15.7 students experiencing homelessness per 100 children living in poverty. Pennsylvania ranks 36 out of 50 states in identification of students experiencing homelessness per school-aged children in poverty.<sup>6</sup> Data indicates that Philadelphia -- the city with the highest overall population of individuals experiencing homelessness -- significantly under-identifies students experiencing homelessness, especially in its charter school sector.<sup>7</sup> ***In 2018, the School District of Philadelphia had the lowest rate of identification of students experiencing homelessness among the 20 largest school districts in the country, having identified 4 students per 100 children living in poverty.*** When children fail to be identified as eligible as required by the McKinney-Vento Act, they are deprived of the robust legal protections and supports that can ensure school success.

Drawing on examples from other states such as Florida, Louisiana, and Texas,<sup>8</sup> ELC has created ***a universal enrollment questionnaire that may be used by schools to identify students experiencing homelessness.***<sup>9</sup> Mandating the use of such a tool along with school staff training regarding the signs of homelessness serves to ensure that students experiencing homelessness will be promptly identified, remain in enrolled in school without disruptions, and receive the supports and protections they need and to which they are legally entitled. A universal enrollment screen helps to eliminate stigma associated with self-identification and the process assists to ensure the confidentiality of information regarding a student's living arrangement as such information is disclosed only to the applicable McKinney-Vento liaison and other designated staff and treated as confidential under the privacy protections for student records set forth in the *Family Educational Rights and Privacy Act*, 42 U.S.C. § 11432(g)(3)(G). School enrollment

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<sup>6</sup> Shaw-Amoah, Anna; Lapp, David, *Students Experiencing Homelessness in Pennsylvania*, Policy Research Brief at p. 3-6 (2021), <https://files.eric.ed.gov/fulltext/ED611597.pdf>.

<sup>7</sup> *Id.* at 10 (Traditional charter schools in Philadelphia served a lower proportion of students experiencing homelessness as compared to School District of Philadelphia schools (0.8% to 2.6%).

<sup>8</sup> For example, Florida's State Board of Education adopted Rule 6A-10.088 in Florida's Administrative Code which standardizes procedures and requirements for identifying students experiencing homelessness and mandates the use of a student enrollment questionnaire created by school districts as well as trainings for school district McKinney-Vento liaisons and other relevant school/district staff. See F.A.C. Rule 6A-10.088, available at <https://www.fldoe.org/core/fileparse.php/20653/urlt/15-2.pdf>. See also Louisiana Department of Education Student Residency available at <https://www.louisianabelieves.com/docs/default-source/policy/louisiana-student-residency-questionnaire---english.pdf?sfvrsn=2> and Texas Education Agency Student Residency Questionnaire Form available at <https://tea.texas.gov/academics/special-student-populations/srq-sample-harvey-12-5.pdf> and Student Intake Form available at <https://tea.texas.gov/academics/special-student-populations/sample-intake-form-21-22.pdf>.

<sup>9</sup> ELC's universal screening tool is available on our website at [https://www.elc-pa.org/wp-content/uploads/2021/04/MV-Screener\\_Fillable-1.pdf](https://www.elc-pa.org/wp-content/uploads/2021/04/MV-Screener_Fillable-1.pdf).

offices should also refrain from contacting people or agencies outside the school system to obtain additional information about the family's or youth's situation.

### **Program Examples:**

- [Cincinnati Public Schools](#) conducted a public education campaign to publicize services that they offer to students experiencing homelessness. They developed relationships with local shelters that send weekly logs of families staying in the shelter.. In addition to required identification strategies like asking about housing stability on school enrollment forms and training school staff, project connect staff distribute surveys to students and families multiple times per year asking about housing stability. Project connect has staffers at local shelters which enables them to identify and directly serve families where they are staying. Finally, Cincinnati Public schools have an MOU agreement with the Hamilton County Clerks of Courts and the University School of law which whereby school staff are notified when a family in the district is facing eviction. They estimate that this leads to the identification of 70 students per month.
- [Houston's Sunrise House](#) is an initiative of Houston Independent School District that established service hubs strategically located in community spaces, serving as comprehensive one-stop shops for HISD students and their families.. These centers opened during the 23-24 school year to bring access like food, clothing, mental health support, and job mentorship to surrounding communities to help those experiencing poverty and/or homelessness. The centers are tailored to the communities that surround them. Around 70% of student live within a 10 minute drive of a sunrise center. The locations were picked based on survey data from Rice University's Houston Education Research Consortium, which mapped crucial needs for each neighborhood.
- [Syracuse, NY](#) The District provides basic necessities including toiletries, clothes, and food and also works with partner agencies to provide each student with a support person who will help the student or family navigate through the different systems, including creating a plan to find stable housing. Students also receive transportation to mental health services and access to a array of community supports in their neighborhood such as athletic clubs, food banks, etc.
- [Santa Fe Public Schools](#) worked with local utility companies to determine which families were in danger of having their utilities disconnected, which is a marker of potential housing insecurity. The district secured grant funds to assist families with utilities, medical bills and helped families get health insurance. Adelante Program staff were part of a communitywide Homeless Task Force made up of multiple community organizations that coordinated to identify and support families and unaccompanied youth in shelters.

Adelante program operated a centrally located warehouse where families experiencing homelessness could go to receive essential goods, such as food, backpacks, school supplies and clothing and connected students to tutoring services offered at each school

## **II. Conclusion**

It is well documented that children and youth experiencing homelessness struggle academically because they are more likely to be absent from school due to the effects of housing instability and frequent school moves.<sup>10</sup> Compounding this challenge is the fact that many students experiencing homelessness lack access to the healthcare needed to address common health issues and experience mental health challenge resulting from the trauma and toxic stress caused by homelessness.<sup>11</sup> Students experiencing homelessness are often forced to miss many days of school and often change schools midyear, rather than remaining in their schools of origin with transportation when this is in their best interest, as required by the McKinney-Vento Homeless Assistance Act.<sup>12</sup> Each school move disrupts students' education and limits opportunities to learn. To address these harms stemming from homelessness we need to intervene to reduce homelessness through collaboration and provide students additional academic resources and support while in school.

Due to systemic and structural racism, including housing policies and inequitable access to economic opportunities, students of color disproportionately experience homelessness. For example, in the 2020-2021 school year, while approximately 36.6% of Pennsylvania's public school students were children of color, they comprised 61% of children and youth identified as experiencing homelessness (32% Black, 21% Latinx, and 8% Asian, Multi-Racial, or

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<sup>10</sup> See *In School Every Day: Addressing Chronic Absenteeism Among Students Experiencing Homelessness*, National Center for Homeless Education (collecting research) (Sept. 2017) <https://nche.ed.gov/wp-content/uploads/2018/10/chron-absent.pdf>.

<sup>11</sup> Chang H. & Jordan, P. (2015). *Mapping the early attendance gap: Charting a course for school success*. <http://www.attendanceworks.org/wordpress/wpcontent/uploads/2015/07/Mapping-the-EarlyAttendance-Gap-Final-4.pdf>.

<sup>12</sup> 42 U.S.C. § 11432(g)(3)(A)-(B).

Indigenous).<sup>13</sup> LGBTQ+ students, youth who have aged out of foster care, and students who are expectant or parenting are also overrepresented among students experiencing homelessness.<sup>14</sup> Students experiencing homelessness are more likely to be identified as being eligible for special education services than their peers who have access to stable housing. According to the Pennsylvania Department of Education, in the 2021-2022 school year 25 percent of students experiencing homelessness were identified as having a disability, with 36 percent of those identified categorized as having a “specific learning disability” while the state average for all students that year was 18.6%.<sup>15</sup> Children and youth with disabilities who experience homelessness also face significant barriers in this context including: high rates of mobility which prevent the timely identification and evaluation of students; enrollment delays and interruptions in services due to school transfers which also undermine progress and monitoring; and lack a consistent educational decisionmaker for unaccompanied youth.<sup>16</sup>

The experience of homelessness also significantly reduces the likelihood that students will have the supports they need to graduate from high school and go on to college. For example, during the 2021-2022 school year, of the 15,479 students experiencing homelessness enrolled in grades 7-12 in Pennsylvania, 3.8 percent dropped out of school, with grade 12<sup>th</sup> grade having the highest percentage at 7.3 percent, followed by grade 11 at 6.6 percent, and grade 10 at 3.8 percent. Of 2,737 grade 12 students for whom graduation status was known, 72.7 percent graduated.<sup>17</sup> It is well established that being denied the opportunity to graduate from high school is linked to negative health consequences, unemployment, poverty, incarceration, and can also perpetuate intergenerational homelessness.<sup>18</sup>

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<sup>13</sup> See PENNSYLVANIA DEPARTMENT OF EDUCATION, *EDUCATION FOR CHILDREN AND YOUTH EXPERIENCING HOMELESSNESS (ECYEH) 2020-21 STATE EVALUATION REPORT* at p.11 (May, 2022), <https://www.education.pa.gov/Documents/K-12/Homeless%20Education/Reports/2020-21%20ECYEH%20State%20Evaluation%20Report.pdf>.

<sup>14</sup> Shaw-Amoah, Anna; Lapp, David, *Students Experiencing Homelessness in Pennsylvania*, Policy Research Brief at p. 3 (2021), <https://files.eric.ed.gov/fulltext/ED611597.pdf>.

<sup>15</sup> See PENNSYLVANIA DEPARTMENT OF EDUCATION, *EDUCATION FOR CHILDREN AND YOUTH EXPERIENCING HOMELESSNESS (ECYEH) 2020-21 STATE EVALUATION REPORT* at p. 11 (May, 2023), <https://www.education.pa.gov/Documents/K-12/Homeless%20Education/Reports/2021-22%20ECYEH%20State%20Evaluation%20Report.pdf>.

<sup>16</sup> *Supporting Students Experiencing Homelessness Who Have Disabilities: Federal Provisions to Increase Access and Success* National Center for Homeless Education (Aug. 2022), <https://nche.ed.gov/wp-content/uploads/2022/08/disabilities-brief.pdf>.

<sup>17</sup> *Id.* at p.12.

<sup>18</sup> See e.g., Hahn, R. A., Knopf, J. A., Wilson, S. J., Truman, B. I., Milstein, B., Johnson, R. L., Fielding, J. E., Muntaner, C. J. M., Jones, C. P., Fullilove, M. T., Moss, R. D., Ueffing, E., & Hunt, P. C. (2015). Programs to

In order to address all of these negative consequences we need to establish a more coordinated effort across our City to mitigate the underlying causes of homelessness for each student cohort. ELC would welcome the opportunity to work with the School District, City Council, DHS, shelters, and community organizations to begin that work by establishing a Task Force to consider some of the solutions I outlined today. Thank you.

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increase high school completion. *American Journal of Preventive Medicine*, 48(5); Wilson, S. J., & Tanner-Smith, E. E. (2013). Dropout prevention and intervention programs for improving school completion among school-aged children and youth: A systematic review. *Journal of the Society for Social Work and Research*, 4(4), 357–372. <https://www.journals.uchicago.edu/doi/10.5243/jsswr.2013.22>.