



Feasibility Study: Homeless Status

Recommendation from the Office of California Cradle-to-Career Data System

This proposal seeks to have the Office of California Cradle-to-Career Data System (Office) provide information on an individual's recent experiences with homelessness, as well as including data collected by the Business, Consumer Services, and Housing Agency (BCSH). This request has a reasonable cost and a high level of value regarding access to actionable information.

The Office recommends that it use existing data to create a new metric on whether an individual experienced homelessness in a specific year. In addition, the Governing Board could direct the Office to approach BCSH to determine its interest in becoming a data provider in summer 2026 so the P20W dataset could include information from the Homeless Data Integration System (HDIS) in the March 2027 cycle.

Background

In 2025, Data and Tools Advisory Board (DTAB) member J. Oliver Schack submitted a proposal to improve information on homelessness in the California Cradle-to-Career Data System (C2C) analytical data set. The full text of the proposal can be found at [this link](#).

When conducting feasibility studies, the Office considers four factors: data availability, data reliability and data validity, cost, and compliance. Information on each aspect is included below.

Potential Approaches to Data Access

There are three ways that this proposal could be addressed:

Option 1: Create an additional homelessness data point using existing data

This option focuses on adjusting how existing data on homelessness is processed. Currently, the Office flags individuals as homeless if any data provider indicated that they experienced homelessness in any year. The proposal would create an additional data point that indicates whether an individual has experienced homelessness in the last year. This additional data point would allow researchers to conduct analyses on topics such as chronic homelessness without requiring that any new data be collected.

Option 2: Secure confirmation of whether an individual experienced homelessness from HDIS

The current data on homeless status comes from the California Department of Education (CDE) for K-12 students, the California Community Colleges Chancellor's Office (CCCCO), and the California Student Aid Commission (CSAC). Therefore, information on homeless status is not currently available for preschool children and four-year college students who do not receive federal financial aid. More complete information would be available if the C2C analytical data set also included data points from BCSH's HDIS.

HDIS is a statewide data system on people receiving homeless services based on data from regional homelessness service coordination and planning bodies. This option would prioritize BCSH as a C2C data provider and would require a memo from BCSH similar to the one provided by the Labor and Workforce Development Agency (LWDA) when workforce data was added. For option two, only one data point would be requested: a simple yes/no regarding whether an individual was flagged as homeless in HDIS.

Option 3: Include a number of homelessness data points from HDIS

HDIS includes additional data points that would enrich analyses about the relationship between homelessness and educational attainment, such as the types of services individuals are receiving and whether services are provided to families with children. This option would follow the same process outlined in

option 2, but would request that the Office work with BCSH to identify a number of new data points to include (rather than a simple yes/no).

Data Availability

Data Sources and Historical Range: *Where the data originates from and the span of years for which data are available.*

Information for the first option is already available in the C2C analytical data set.

Information for the second two options would require that the Office establish a data sharing agreement, create file specifications, and ingest data from BCSH.

Future Relevance and Data Availability: *Evaluate whether the new data will remain useful as the analytical dataset evolves and if the information is likely to be collected in the future.*

Given that affordable housing is consistently one of the top concerns of Californians, better data on homelessness will be valued by the public, policy makers, educators, and service providers in the future.

Because HDIS assists the state to better coordinate services for unhoused people, it is likely this information will be collected in the future.

Data Reliability and Data Validity

Institutional Variability: *Whether there are variations in administrative practices and data recording across institutions at the local level.*

Current data collection by educational institutions is likely to be consistent, given that there are clear guidelines for reporting by CDE, CCCCO, and CSAC.

Information from HDIS is also likely to be consistent because local collection must conform to federal definitions.

Agency Variability: *Data and metric definitions across various agencies follow a uniform format and standard.*

Definitions vary across agencies. For K-12 students, this information is gathered by California K-12 local education agencies (LEA). CCCCO and CSAC data are reported by students on application forms. In each case, different criteria are used. For example, CSAC captures data on students at risk of being homeless, while CCCCO uses a definition that is aligned with the Workforce Innovation and Opportunity Act (WIOA).

HDIS is constructed using federal definitions that include data points including entry and exit dates, whether people are experiencing homelessness for the first time, the amount of time an individual has been homeless, the number of people who return to homelessness, whether they are placed into permanent housing, and how many had successful placements from street outreach projects.

Data Integration Across Agencies: *The Office's ability to consolidate data from multiple agencies.*

The Office would be able to ingest HDIS data, using the same matching process that is used with other agencies.

Cost

Startup Costs: *Costs to provide access including both direct costs and associated staff time for the Office and its data providers.*

The cost for option one would be small, given that it only requires a change in coding.

Costs for options two and three would be more significant, as it requires that the Office meet with BCSH to determine which data points to share. Then, the Office will need to work with BCSH to establish the file specifications. The cost differential between options two and three depends on how many data points would be shared. This activity would need to be integrated into a future work plan and weighed against other priorities, such as establishing definitions for health and human services or early childhood data points. These would be similar staff time costs to onboarding and importing data from LWDA agencies,

Department of Developmental Services (DDS), and the Scholarshare Investment Board (SIB).

Ongoing Costs: *Costs necessary to maintain collection of the stated data elements for the Office and data providers.*

There are no significant ongoing costs for option one.

For options two and three, once the data definitions are established, data specifications are completed, data are uploaded, and records are matched, there will be minimal costs for the Office and BCSH.

Compliance

Legal Requirements: *Compliance with privacy laws, intellectual property rights, and any other relevant regulations.*

There are no legal concerns regarding making a new metric using existing data.

If the Office works with BCSH, they should consider any legal factors relating to allowable use requirements for homeless data.

Scope: *Whether the proposal is consistent with the scope of work that is described in the Cradle-to-Career Act.*

The [initial legislation](#) did not include a specific reference to homelessness, but does indicate that the data system should include health and human services data.

Neutrality of the Office: *Whether the proposal might jeopardize the Office's neutral stance.*

Including additional information on homelessness would not jeopardize neutrality, particularly given that the data providers discussed the value of providing both “if ever” and “current year” versions of metrics associated with student characteristics during the [planning process](#). In addition, the issue of variable data definitions was discussed during the [planning process](#) as a limiting

factor. At the time, because HDIS had not yet been built, it was proposed as a potential future data source.

Suppression and Regulatory Feasibility: *The impact of compliance policies on access to data based on the Office's data suppression policy and other regulatory concerns such as reidentification risks.*

This proposal can be implemented using the current data suppression policies and does not pose a risk to regulatory issues such as reidentification.