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IN THE SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

WASHINGTON STATE COALITION FOR)  
THE HOMELESS, )  
et al., )  
Plaintiffs, )  
vs. )  
DEPARTMENT OF SOCIAL AND )  
HEALTH SERVICES, )  
et al., )  
Defendants. )

No. 91-2-15889-4

STIPULATION OF FACTS

As evidenced by their attorneys' signatures, which appear below, the parties stipulate to the following facts:

1 Homeless families with children in Washington State, and some of their demographic characteristics, are estimated in the Department of Community Development's "Emergency Shelter Assistance Program" (ESAP), Characteristics of People Receiving Services from July 1, 1991 to June 30, 1992" (Exhibit F). When extracted and compared with the 1990 Census the following

statistics can be calculated:

- 1.1 7,926 families with 17,200 minor children in shelter;
- 1.2 23,699 families with 49,768 minor children turned away from shelter for lack of space;
- 1.3 Of the 17,200 minor children in shelter with their families, 48% were age 5 and younger, 27% were age 6 through 10, and 25% were age 11 through 17;
- 1.4 The racial, ethnic and gender composition of families with minor children in shelter in comparison to Washington State's general population are as follows:

	% of families in shelter	% of Washington State (1990 Census)
African-American	20.0 %	3.1 %
Hispanic	14.8 %	4.4 %
Asian	1.3 %	4.3 %
Native American	5.4 %	1.7 %
White	56.3 %	88.5 %
Families headed by single female	63.1 %	17.5 %

1.5 Homeless families with children are in every county of Washington State.

These estimates do not include the homeless families with children who sought shelter from shelters that received no funds from ESAP or who did not seek shelter, and include multiple counts of those families with children who sought shelter from ESAP shelters more than once, and were accepted or turned away.

2 The Department of Social and Health Services (DSHS) has not conducted any studies and does not compile information or data on the following:

- 2.1 homelessness among families with children in

1 Washington State, the causes of homelessness among  
2 families, its effects on children and families, or its  
3 effects on the cost or accessibility of DSHS programs  
4 for children and families;

5 2.2 the efficacy of DSHS's service delivery to homeless  
6 families as a separate population in the State of  
7 Washington;

8 2.3 whether homelessness or the lack of housing is an  
9 individual factor in the placement or retention of  
10 children in foster care in Washington State,  
11 voluntarily or involuntarily, or is mentioned in  
12 dependency pleadings or Individual Service Plans;

13 2.4 the extent to which the parents' procurement of  
14 adequate housing is listed in dependency court orders  
15 or Individual Service Plans among the preconditions  
16 for a child's return from foster care.

17 3 There is no DSHS service program for families with minor  
18 children that has homelessness as an eligibility requirement,  
19 except for the homeless day care program.  
20

21 4 DSHS has not sought any legislative appropriation nor has  
22 the legislature appropriated any funds for service programs that  
23 have homelessness as an eligibility requirement to be adminis-  
24 tered by DSHS, except for the homeless day care program.  
25

26 5 The average monthly costs per child of the state's payments  
27 to foster care parents or to the custodial foster care agency  
28

1 for out-of-home placements in the State of Washington are as  
2 follows:

3 Receiving care \$ 236.43  
4 Foster care \$ 344.27  
5 Group Care \$ 2,427.52

6  
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Attorney General

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12 Dated: 8.31.93

13 Dated: 9.1.93