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Educating Children and Youth Experiencing Homelessness

by

Funding Local Implementation:

**Compliance for Positive Student Outcomes under
the McKinney- Vento Homeless Assistance Act**

by

Darius Jamal Brown

A Thesis Quality Research Project

Submitted in Partial Fulfillment of the

Requirements for the

Masters' Degree

in

PUBLIC ADMINISTRATION

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INTRODUCTION

Homelessness is prevalent across California, with an estimated 265,000 students experiencing various forms of homelessness enrolled in public schools across the state (USICH, 2019).

Congress enacted the McKinney-Vento Homeless Assistance Act over 30 years ago to mitigate the educational barriers that students experiencing homelessness face. From this legislation, the federal Education for Homeless Children and Youth (EHCY) grant program apportioned funding to states with the intent to help Local Educational Agencies (LEA). These are public agencies, generally school districts, that oversee education for public school students. EHCY funding aids these agencies with identification, enrollment, attendance, and academic achievement for children and youth experiencing homelessness.

The McKinney-Vento Homeless Assistance Act's intent primarily focuses on ensuring that students experiencing homelessness have the same equal access to free public education as do all other students. However, the limited funding available for this program is not enough to support every one of the preschools, primary-elementary schools, and secondary-high schools. As a result, some LEAs do not receive funding to support students experiencing homelessness. This report focuses on two counties that receive EHCY funding, and explores how the two LEAs use this grant money to impact children and youth experiencing homelessness

RESEARCH QUESTION

This project focused on two LEAs that received EHCY funding in California, and aimed to answer the following research question:

How does receiving EHCY funding affect the services directed at fulfilling the goal of the McKinney-Vento Homeless Assistance Act of ensuring free public education for children and youth experiencing homelessness in two California counties?

BACKGROUND

Statement of the Problem

The Department of Housing and Urban Development (HUD) reported that more people in California experience homelessness than in any other state in the nation (USICH, 2019). A significant number of unaccompanied youth and families with children are among Californians experiencing homelessness (Howle, 2019). United States Interagency Council on Homelessness (USICH) noted that during the 2017-2018 school year, California public school data demonstrated that an estimated 265,000 public school students experienced homelessness over the course of the year. Of that total, 10,407 students were unsheltered, 17,299 were in shelters, 13,713 were in hotels/motels, and 221,639 were doubled up (USICH, 2019). Doubled up households consist of multiple families living together, whether related or not, due to loss of housing, economic hardship, or other similar reasons (EHCY, 2001).

Recent research highlights lack of education as a factor that leads to chronic homelessness as students reach adulthood. Chapin Hall at the University of Chicago found that a risk factor for experiencing homelessness as a young adult is a lack of a high school diploma or GED (SchoolHouse Connection, 2019). Homeless children and youth (HCY) suffer longstanding consequences due to homelessness, however, education plays an indispensable role in the early intervention and prevention of future homelessness (SchoolHouse Connection, 2017).

In 2009, the average annual income for someone who dropped out of high school was \$19,540, compared to \$27,380 for a high school graduate. People who have not graduated from high school also are more likely to lose their jobs during economic downturns. Students experiencing homelessness often strive to complete school, knowing it will lead to better employment, higher

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income, and stable housing. Yet, they face many obstacles to academic achievement. (CHYP, 2014)

Educational achievement is commonly linked to employment earnings, with more years of education relating to earnings and wages that are potentially higher than someone with fewer years of education (BOL, 2015). Porter noted that American workers with a college degree are paid seventy-four percent more than those with only a high school diploma (Porter, 2014). As a result, education is a pathway out of the cycle of poverty for many students experiencing homelessness in California.

Although education is a pathway out of the cycle of poverty, the difficulty that HCY face with advancing their educational achievement is navigating through the achievement gap, which Growe & Montgomery (2003) define as the disparity between the academic performance of different groups of students. If education is the great equalizer against poverty, as Growe & Montgomery (2003) state, then why is there an academic achievement gap between students from low-income families and their more affluent peers?

Students experiencing homelessness are faced with an array of challenges, unlike those of other students, in order to be able to attend and succeed in school. Some students wake up before sunrise with their parent(s) to start their daily commute to school (Family Promise, 2020). Some students reside in shelters that lack an area for quiet studying. Sometimes, students have no food or healthy snacks when they are not at school (NCHE, 2012). In many instances, those challenges are unbeknownst to school teachers, school nurses, and school administration, but are paramount in addressing the needs of HCY. These daily and nightly challenges highlight the levels of traumatic stress that HCY bear before they even enter a classroom (NCFH, 2006). Accordingly, homeless students likely experience low achievement test scores, poor grades,

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educational disabilities, school behavior problems, grade retention, truancy, and school dropout (Jozefowicz-Simbeni & Israel, 2006). These youth are twice as likely to have learning disabilities and three times more likely to have emotional and behavioral problems than their peers who are not experiencing homelessness (Howle, 2019).

Moreover, HCY constantly battle medical, dental, and behavioral health risks. In homeless families, medical problems are severe; they can lead to increased morbidity, illness and premature death (Morris, 2004). Families lacking cooking facilities may contribute to poor nutrition, and increased impacts from congenital disabilities, accidents, and diseases (Morris, 2004). Among school age HCY, 47% have problems such as anxiety, depression, and withdrawal, compared to 18% of other school-aged children and youth (USICH, 2018a). In addition, 36% manifest delinquent or aggressive behavior, compared to 17% of other school-age children and youth. (USICH, 2018a).

According to United States Interagency Council on Homelessness (2018b), homeless families face many problems, including domestic violence, physical, sexual, and emotional abuse, and a high prevalence of alcohol and substance addiction or mental health disorders. Compared to children with permanent homes, homeless children suffer more from lack of educational opportunities, infection, obesity, anemia, injuries, burns, developmental delays and incomplete immunization; youth suffer more injuries, sexually transmitted diseases, mental health problems, and pregnancies (Raising the Roof, as cited in Shields and Warke, 2010). Poverty, exacerbated by the high cost of housing, is often associated with high levels of crime in low-income neighborhoods, increased health problems, sparseness of books in homes, and malnutrition, and is strongly correlated with poor educational outcomes (Shields and Warke, 2010).

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Another reason that HCY face disparity in academic achievement is because families unsuccessfully attempt to meet the hierarchy of human needs. As a result, HCY are at more significant risks of attending multiple schools within one school year, and missing out on crucial classroom instructional time (Cunningham, 2010). Frequent school changes mean that children must adapt to a new school curriculum, and may have to catch up to students in the new classroom (Cunningham, 2010). Highly mobile students, including students who are homeless, have also been found to have lower test scores and overall academic performance than peers who do not change schools (NCHE, 2018).

The disparity in academic performance between HCY and their housed peers is supported by the ample evidence provided by Duffield and Lovell's (2008) research that compared HCY to students with permanent housing. HCY were 2.5 times more likely to perform below grade level in math, 1.5 times more likely to perform below grade level in reading, and 1.5 times more likely to perform below grade level in spelling. (Duffield and Lovell, 2008). All these obstacles and disparities in academic achievement keep children in the cycle of traumatic poverty.

Federal, State, and Local Governments Seek to Remove Barriers to Academic Achievement Among Homeless Children and Youth

Preventing and ending homelessness is a continuing long-term goal of federal, state, and local governments; responding to homelessness through education is an immediate solution that can make those goals attainable in the future (USICH, 2018). In 1987, Congress legislated the first education-related homeless funding policy, the McKinney-Vento Homeless Assistance Act (MVHAA) (NCH, 2006). This law provides educational rights and protections for students who lack a fixed, regular, and adequate nighttime residence, along with funding to support the implementation of mitigating programming within states and counties (42 U.S. Code 11434a,

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2016a). The MVHAA was the by-product of the legislative responses to homelessness under the Reagan Administration. In 1986 alone, there was the Homeless Persons' Survival Act, the Homeless Eligibility Clarification Act, the Homeless Housing Act, and the Urgent Relief for the Homeless Act (NCH, 2006). These pieces of legislation established the groundwork for MVHAA's bipartisan development. President Ronald Reagan signed MVHAA into law on July 22, 1987 (NCH, 2006). According to the National Coalition for the Homeless (2006), the MVHAA remains the only significant federal legislative response to homelessness. It contains programs providing a range of services to homeless people, including emergency shelter, transitional housing, job training, primary health care, education, and some permanent housing (24 CFR § 578.3, 2016). The McKinney-Vento Homeless Assistance Act contains nine titles highlighted in Table 1.

Table 1: MVHAA’s Nine Titles

Title I	Includes a statement of six findings by Congress and provides a definition of homelessness.
Title II	Describes the functions of the Interagency Council on the Homeless, an independent entity within the Executive Branch composed of the heads of 15 federal agencies.
Title III	Authorizes the Emergency Food and Shelter Program, which is administered by the Federal Emergency Management Agency (FEMA).
Title IV	Authorizes the emergency shelter and transitional housing programs administered by the Department of Housing and Urban Development, including the Emergency Shelter Grant program the Supportive Housing Demonstration Program, Supplemental Assistance for Facilities to Assist the Homeless, and Section 8 Single Room Occupancy Moderate Rehabilitation.
Title V	Imposes requirements on federal agencies to identify and make available surplus federal property, such as buildings and land, for use by states, local governments, and nonprofit agencies to assist homeless people.
Title VI	Provides health care services to homeless persons, including the Health Care for the Homeless program, a Community Mental Health Services block grant program, and two demonstration programs providing mental health and alcohol and drug abuse treatment services to homeless persons.
Title VII	Authorizes four programs: the Adult Education for the Homeless Program and <u>the Education of Homeless Children and Youth Program</u> , both administered by the Department of Education; the Job Training for the Homeless Demonstration Program, administered by the Department of Labor; and the Emergency Community Services Homeless Grant Program, administered by the Department of Health and Human Services.
Title VIII	Amends the Food Stamp program to facilitate participation in the program by persons who are homeless, and also expands the Temporary Emergency Food Assistance Program, administered by the Department of Agriculture.
Title IX	Extends the Veterans Job Training Act.

Source: NCH, 2006, n.p.

The entitlements from the MVHAA reformed the way the nation responded to different experiences of homelessness. The MVHAA’s legislative intent aims to mitigate the effects of residential instability on students experiencing homelessness’ disrupted education. This is done through the Education for Homeless Children and Youth (EHCY) program. The EHCY program activities consist of identification of homeless children in schools, and the provision of services,

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including expedited enrollment, transportation to school, tutoring, and mental and physical health referrals (Cunningham; et.al, 2010). This Act is a critical piece of legislation, as it provides uniformity for all the different localities across the nation.

The legislation also authorizes the United States Department of Education (ED) to provide EHCY grants to states to administer and oversee LEAs' activities under the EHCY program (42 U.S. Code 11433a, 2016b). Rosenbloom, Kravchuk, & Clerkin (2015) explained how governments use grants to subsidize third parties to provide public services rather than deliver them directly (Rosenbloom, et.al, 2015). By providing EHCY grants to LEAs, the ED is engaging in this practice as outlined by Rosenbloom et al (2015). A LEA serves as a resource for homeless students, and can take the form of a public board of education or other public authority that is legally constituted within a state, to provide administrative control or a service for public elementary or secondary schools in a city, county, township, school district, or other political subdivision of a state (NCHE, 2020). Title 42 of the United States Code § 11432 authorizes the ED to provide the EHCY grant to states, and § 11433 authorizes states to award EHCY subgrants to LEAs. (42 U.S.C §§ 11432a, 11433a, 2016(c)(b)).

In general, subject to minimum award requirements, the amount that a state receives for the EHCY program is based on the proportion of funds allocated nationally that it receives under Title I, Part A of the Elementary and Secondary Education Act of 1965, as amended (ESEA). In turn, states award a majority of these funds on a competitive basis to select school districts in their state (grantee districts), based on factors such as the needs of homeless children and youth within a particular district and the ability of the district to meet those needs. (GAO, 2014).

In California, LEAs apply for funding from the ED through the California Department of Education (CDE), to provide educationally related support services to students experiencing

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homelessness. USICH determined that monitoring EHCY grantees is necessary to ensure that HCY are identified and receive support services (GAO, 2014). USICH also noted the important role that the ED can play in fostering best practices, strategic partnerships, and innovation to address the needs of homeless students. USICH stated that it considers ED and the EHCY program to be critical partners in developing and advancing the work of USICH's goal of ending homelessness among families, children, and youth by 2020 (GAO, 2014).

The ED provides financial assistance and guidance to LEAs that enroll a high concentration of HCY. These services are free of charge for the entire time that the student and family experience homelessness (42 U.S. Code 11432a, 2016c). LEA primary responsibilities include removing all barriers to the enrollment, retention, and academic achievement of students experiencing homelessness. The barriers that are removed allow these students to be appropriately identified, immediately enrolled in school, and receive educational services that are comparable to permanently housed students (42 U.S. Code 11432a, 2016c).

LEAs designate McKinney-Vento Liaisons to assist with streamlining services to HCY. Jozefowicz-Simbeni and Israel (2006) describe the facets of being a McKinney-Vento liaison as someone who is responsible for ensuring that HCY have smooth matriculation into school, someone who facilitates the education of school personnel and parents regarding the rights guaranteed under MVHAA, and someone who may act as an intermediary between parents and students. As intermediaries, local liaisons may need to assist in document procurement and delivery, dispute resolution, school enrollment, securing material needs such as food and clothing, and supporting ongoing education (Jozefowicz-Simbeni and Israel, 2006). As such, liaisons serve as the manifestation of the EHCY program, as they are the ones sensitive to the needs of HCY and seek to fulfill MVHAA's legislative intent by removing barriers for HCY.

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Implementing MVHAA's protections is crucial to assist in removing barriers for HCY. Yet, the work of ensuring that the homeless student population is supported under MVHAA is fundamentally unfunded unless an LEA is a subgrant recipient of the federal EHCY grant program. This research focused on two LEAs that receive EHCY funding, Monterey County Office of Education (MCOE) and Santa Cruz County Office of Education (SCCOE), and investigated how access to EHCY funding affects the delivered services of LEAs to fulfill the legislative intent of the McKinney-Vento Homeless Assistance Act.

LITERATURE REVIEW

Family Homelessness and School-Aged Children and Youth

In the United States, rates of student homelessness have been on an upward trajectory. As stated in *Out of the Shadows* (ICPH, 2017), despite decades of varied policy approaches and a growing body of literature on the impact of homelessness on the development of young bodies and minds, the number of children without a permanent home continues to grow, with close to 1.3 million students in public schools counted as homeless during the 2014–15 school year (ICPH, 2017). As explained in *Homelessness in America: Focus on Families with Children* (USICH, 2018a), families with children experiencing homelessness represent one-third of all people experiencing homelessness on a given night, and 59% of people experiencing homelessness in families are children under the age of 18. Approximately 58,000 family households experience unsheltered or sheltered homelessness in America on a given night (USICH, 2018a). Children account for 40% of the homeless population in the United States, and that number is expected to increase due to worsening economic trends throughout the country (Canfield, 2012). Simply put, the increasing number of identified homeless students is significant.

McKinney-Vento Homeless Assistance Act

The McKinney-Vento Homeless Assistance Act (MVHAA) is a federal law requiring each state to ensure that every homeless child has access to the same education as housed children (42 U.S. Code § 11431, 2016d). The MVHAA gives students experiencing homelessness a set of critical educational rights and protections. Central themes within the law include identification, school stability, school enrollment, and support for academic success through best interest decision-making (42 U.S. Code § 11431, 2016d). The Act also requires every LEA to designate liaisons to

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make sure that HCY are identified by school personnel, and supported through coordination with other service-providing agencies (42 U.S. Code § 11432a, 2016c). McKinney-Vento liaisons have access to families experiencing homelessness, which is a population that is often difficult to locate and identify (Samuels, 2010). Therefore, the MVHAA allows for the possibility of reaching and connecting HCY to services they otherwise might not obtain.

The difficulty with providing appropriate measures of support mechanisms for HCY is funding. According to the United States Department of Education,

McKinney-Vento funding is annually apportioned to states based on the state's proportion of the Title I, Part A federal allocation. States must subgrant funds competitively to school districts within the state to be used for program implementation at the district level. States must distribute no less than 75% of their annual McKinney-Vento allocation to local school districts in subgrants; a few minimally funded states may reserve up to 50% of their allocation. Subgrants are awarded competitively based on need and the quality of the subgrant application (USDE, 2018 December).

Funding programs can be burdensome on a state such as California, considering that there are close to 2,300 LEAs statewide (Howle, 2019). LEAs that want to provide services to students experiencing homelessness must apply for EHCY competitive state grants. An LEA must have identified at least 50 students who are experiencing homelessness to be eligible for the grant awards, or alternately, multiple LEAs can form a consortium to meet this requirement (Howle, 2019). The federal government disperses the funding every three years, but only 24% of local educational agencies nationwide receive EHCY subgrants (SchoolHouse Connection, 2019).

EHCY subgrants are used to pay for outreach and identification, enrollment assistance, transportation, school records transfer, immunization referrals, tutoring, counseling, school supplies, professional development for educators and community organizations, and referrals for

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community services (SchoolHouse Connection, 2019). For example, MVHAA allows HCY to remain enrolled in the same school of origin throughout the period that they are experiencing homelessness with their families (EHCY, 2001). School of origin is defined as the school that the child or youth attended when permanently housed, or the school in which the child or youth was last enrolled (EHCY, 2001). EHCY programs require LEAs to enroll students in homeless situations in school immediately, even if they do not have documents normally required for enrollment, such as previous school records, medical or immunization records, proof of residency, proof of guardianship, a birth certificate, or other documents (NCHE, 2018).

LEAs are also required to make sure that the transportation department has a process and system in place to serve HCY promptly. This system has to have the capability to arrange new transportation within days' notice and communicate the arrangement to the parent or guardian (EHCY, 2001). Additionally, if the student lives within the LEA mileage boundaries from the school that would require school bus transportation, the parent or guardian, and in some cases unaccompanied homeless youth, can request transportation assistance, which the LEA will provide at no cost (MVHAA, 2001, Sec.722(g)(4)(A)).

EHCY funding not only stimulated the removal of enrollment barriers but also increased the focus on programming and community collaborations for the improved academic success of homeless students (Jozefowicz-Simbeni & Israel, 2006). The county program coordinators manage the EHCY program, and work collaboratively with all local school district homeless liaisons residing in their county, the CDE Coordinator of Homeless Education, and various community and private organizations (Howle, 2019). As a result of this policy, over 265,000 homeless students in California receive an education, regardless of housing status (USICH, 2019).

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For the past three federal fiscal years, the federal appropriations for EHCY program grants increased as seen in Table 3.

Table 2: EHCY appropriations

Program	FY2017	FY2018	FY2019	FY2020 House	FY2020 Senate
McKinney-Vento Act Education for Homeless Children and Youth (EHCY) Program	\$77 million	\$85 million	93.5 million	\$100 million	\$102.5 million (Preliminary Senate Draft - Not Yet Marked-Up in Committee)

Source: SchoolHouse Connection, 2019, n.p.

For the 2018-2019 school year, \$10,560,000 out of the \$85,000,000 apportioned for states was allocated to California (Howle, 2019). CDE made \$10,040,000 available for LEA local assistance: \$8,690,000 for competitive sub-grants and \$1,350,000 for one-time discretionary grants for homeless education programs that did not receive the three-year grant. While 130 LEAs applied for this funding in California, only 73 LEAs received an award (Howle, 2019). About 3% out of the approximately 2,300 LEAs in California receive EHCY funding to support HCY.

Congress has reauthorized the MVHAA legislation several times, most recently under Every Student Succeeds Act (ESSA) in 2015.

To receive federal assistance, each state must submit a plan (consolidated State plan) that describes how the state intends to implement various federal requirements for each program covered by ESSA, including the one established by the McKinney-Vento Act—what educational experts commonly refer to as the homeless education program.

Therefore, a portion of the State plan must include strategies to address challenges that youth experiencing homelessness face with enrollment, attendance, and academic

success. The state coordinator is responsible for implementing the portion of the State plan that pertains to homeless education (Howle, 2019).

Under ESSA, ED requires State Educational Agencies (SEA) to develop goals within their consolidated state plan that follows Title VII, Subtitle B of the MVHAA. Public education institutions must comply with the federal and state requirements for educating students experiencing homelessness. ESSA affords states more authority to enhance LEA leadership, and reinforces the focus on providing an inclusive educational curriculum with safe and healthy schools for all students. CDE's state plan is shown in Table 4.

CDE State Plan

The MVHAA requires each state to describe in its consolidated state plan how it will ensure that all school districts within the state comply with EHCY program requirements, but does not specify how states must monitor compliance or where they should focus their efforts (USGAO, 2014). In California's 2019 ESSA state plan, CDE identified seven priorities outlined in Table 4. This research on how funding affects the delivery of services to ensure the legislative intent is fulfilled sought to fill a gap in the existing literature of MVHAA research and EHCY programming. The following findings explored MVHAA's intent through the funding of the two county EHCY programs and their activities for removing all educational barriers for students experiencing homelessness.

Table 3: CDE ESSA State Plan Priorities

Priority	Details
<p><u>Student Identification</u> (722(g)(1)(B) of the McKinney-Vento Act): Describe the procedures the SEA will use to identify homeless children and youth in the State and to assess their needs.</p>	<p>California will monitor the implementation of these procedures to identify homeless children and youth and assess their needs and will make improvements as necessary based on LEA and stakeholder feedback</p> <p>Each LEA is required to identify and track the number of homeless students by grade level in the California Longitudinal Pupil Achievement Data System (CALPADS), which houses student-level data including demographics, course data, discipline, assessment, and other data for state and federal reporting.</p>
<p><u>Dispute Resolution</u> (722(g)(1)(C) of the McKinney-Vento Act): Describe procedures for the prompt resolution of disputes regarding the educational placement of homeless children and youth.</p>	<p>The current process is posted on the CDE Resources for Homeless Children and Youths Web page at http://www.cde.ca.gov/sp/hs/cy/disputeres.asp. California will continue to provide professional development and technical assistance to LEAs regarding the dispute resolution process to ensure effective implementation, as well as continue the monitoring of LEAs through the FPM process</p>
<p><u>Support for School Personnel</u> (722(g)(1)(D) of the McKinney-Vento Act): Describe programs for school personnel (including the LEA liaisons for homeless children and youth, principals and other school leaders, attendance officers, teachers, enrollment personnel, and specialized instructional support personnel) to heighten the awareness of such school personnel of the specific needs of homeless children and youth, including runaway and homeless children and youth.</p>	<p>California will continue to collect and post annually a database of LEA liaisons and their contact information through the CDE Resources for Homeless Children and Youths Web page to enable school personnel to contact LEA liaisons for specific information and resources as needed. This list of LEA liaisons becomes the basis for the Homeless Education Resources Listserv, which allows the State Homeless Coordinator to disseminate resources, materials, updates, and training modules.</p>
<p><u>Access to Services</u> (722(g)(1)(F) of the McKinney-Vento Act): Describe procedures that ensure that:</p> <ul style="list-style-type: none"> (i) Homeless children have access to public preschool programs, administered by the SEA or LEA, as provided to other children in the State; (ii) Homeless youth and youth separated from public schools are identified and accorded equal access to appropriate secondary education and support services, (iii) Homeless children and youth who meet the relevant eligibility criteria do not face 	<p>California’s Homeless Education Posters and COE and LEA liaison contact information are provided to all Head Start, Early Head Start, and ICC Regional/Family Resource Centers on an annual basis. In addition, the State Coordinator and CDE early education program staff participate in a state advisory committee convened by WestEd.</p> <p>For homeless youth disconnected from the school system, model policies, practices, and various programs will be shared so that LEAs can effectively partner with community-based organizations (CBOs).</p>

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Priority	Details
<p>barriers to accessing academic and extracurricular activities</p>	<p>Using the Homeless Education Resource Listserv, the State Coordinator disseminates many resources from the National Center for Homeless Education including, but not limited to, <i>Ensuring Full Participation in Extra-Curricular Activities for Students Experiencing Homelessness</i> and <i>Serving Homeless Children and Youth in Charter Schools</i> briefs.</p>
<p><u>Strategies to Address Other Problems</u> (722(g)(1)(H) of the <i>McKinney-Vento Act</i>): Provide strategies to address other problems with respect to the education of homeless children and youth, including problems resulting from enrollment delays that are caused by—</p> <ul style="list-style-type: none"> i. requirements of immunization and other required health records; ii. residency requirements; iii. lack of birth certificates, school records, or other documentation; iv. guardianship issues; or v. uniform or dress code requirements. 	<p>The California training modules will address each of the issues listed above. The training modules will offer strategies and best practices to remove the barriers to immediate enrollment and ways to access various resources to obtain immunizations, other medical records, birth certificates, school records, and uniforms.</p>
<p><u>Policies to Remove Barriers</u> (722(g)(1)(I) of the <i>McKinney-Vento Act</i>): Demonstrate that the SEA and LEAs in the State have developed, and shall review and revise, policies to remove barriers to the identification of homeless children and youth, and the enrollment and retention of homeless children and youth in schools in the State, including barriers to enrollment and retention due to outstanding fees or fines, or absences.</p>	<p>Technical assistance is offered to those LEAs that do not have an approved homeless education board policy. California requires those LEAs that are applying for the federal supplemental EHCY grant funding to submit their approved homeless education board policies and administrative regulations.</p>
<p><u>Assistance from Counselors</u> (722(g)(1)(K)): A description of how youths described in section 725(2) will receive assistance from counselors to advise such youths and prepare and improve the readiness of such youths for college.</p>	<p>California will provide an overview of the requirements and showcase successful strategies for advising youth in order to prepare and improve their readiness for college. These modules will be for any stakeholder to learn about state and federal law with a focus on collaboration and coordination with higher education, new state laws, and the process for completing the Free Application for Federal Student Aid.</p>

Source: California Department of Education, 2019, pp. 125-133.

METHODOLOGY

This research used a standards-based evaluation to determine how LEAs that receive EHCY funding remove barriers to HCY, and as a result fulfill MVHAA’s legislative intent. This research used standards-based evaluation, as described in Sylvia and Sylvia (2012) “to encompass a variety of criteria against which agency operations can usefully be judged” (p. 76). To do so, the researcher used a tool from the National Center for Homeless Education, summarizing national best practices and evidence-based models (See Appendix A, NCHE Crosswalk of Standards and McKinney-Vento Provisions). These source standards are representative of significant provisions of the MVHAA.

Creating the Standards-Based Evaluation Tool

The standards-based evaluation consisted of organizational authorized activities displayed in Table 4 based on the National Center for Homeless Education needs assessment standards (Appendix A). To create this organizational assessment tool, the researcher transcribed the activity indicators (Appendix B) from the National Center for Homeless Education and created a survey that was sent online to be answered by the participants. The survey can be found in Appendix C.

The standards are arranged into four categories to display (1) outcomes for students experiencing homelessness, (2) LEA support activities, (3) LEA collaboration between the school district and community, and (4) LEA program management. The standards include a wide range of support activities that provide the foundation for enabling the legislative intent. The activity indicators reflect both requirements in the law and good practices stated in ways that are specific and measurable. Indicators feature program aspects that can be measured to show

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progress in meeting the standards and can be used as part of an LEA needs assessment or monitoring evaluation.

The standards were divided into the following categories:

1. Student Performance Standards
2. LEA Support Standards
3. LEA Outreach and Collaboration Standards
4. LEA Program Management Standards

Table 4: Standards-Based Organizational Activities

Standards and Activity Indicator	MCOE	SCCOE	Compliance
Student Performance Standards	<input type="checkbox"/>	<input type="checkbox"/>	
School Enrollment	<input type="checkbox"/>	<input type="checkbox"/>	
Opportunity to Meet Challenging Academic Standards	<input type="checkbox"/>	<input type="checkbox"/>	
Improving/lowering Suspensions	<input type="checkbox"/>	<input type="checkbox"/>	
Improving Attendance rates	<input type="checkbox"/>	<input type="checkbox"/>	
Student proficiency measures	<input type="checkbox"/>	<input type="checkbox"/>	
Activities for Preschool and Unaccompanied Students	<input type="checkbox"/>	<input type="checkbox"/>	
LEA Support Standards	<input type="checkbox"/>	<input type="checkbox"/>	
Identification	<input type="checkbox"/>	<input type="checkbox"/>	
Remove Barriers to Enrollment	<input type="checkbox"/>	<input type="checkbox"/>	
Ensure Enrollment in School of Origin	<input type="checkbox"/>	<input type="checkbox"/>	
LEA Outreach and Collaboration Standards	<input type="checkbox"/>	<input type="checkbox"/>	
Training and Outreach	<input type="checkbox"/>	<input type="checkbox"/>	
Coordination with Service providers	<input type="checkbox"/>	<input type="checkbox"/>	
LEA Program Management Standards	<input type="checkbox"/>	<input type="checkbox"/>	
Use of Statewide Assessment Data	<input type="checkbox"/>	<input type="checkbox"/>	
Program Evaluations	<input type="checkbox"/>	<input type="checkbox"/>	
Data/Information Collection	<input type="checkbox"/>	<input type="checkbox"/>	
Monitor Staffing Changes of LEA	<input type="checkbox"/>	<input type="checkbox"/>	

Source: NCHE, 2017, p. 29.

Data collection

To gather the data necessary to answer the stated research question, the researcher used a managerial audit approach to: review MCOE's and SCCOE's organizational program structures and operating program procedures in regards to the EHCY grant program; analyze whether the LEAs not only met compliance criteria, but also achieved MVHAA's legislative intent by providing an appropriate level of service to HCY through the National Center for Homeless Education activity indicators (Sylvia & Sylvia, 2012).

The data used for this research was readily available public data. MCOE and SCCOE captured yearly student demographics and reported the information to the CDE. Through this process, the researcher collected a snapshot of the number of students experiencing homelessness, as defined by the MVHAA, in Monterey and Santa Cruz counties for school years 2016, 2017, and 2018 (CDE,2020a). Access to the EHCY grant award amount (CDE,2020a), and MCOE's and SCCOE's performance overview (CDE,2020b) from the CDE and Education Data Partnership (2020), aided the researcher with analyzing support and management standards. This data was accessible through MCOE's and SCCOE's website, and the CDE educational data website. The researcher collected data from the California Department of Education about whether the two counties received EHCY grant funding for the most current grant cycles (CDE,2020a).

This research also surveyed two county coordinators. The indicators and corresponding questions are displayed in Appendix C. Through the survey responses, this research analyzed MCOE's and SCCOE's fulfillment of MVHAA's intent. It evaluated adherence to the MVHAA through monitoring indicators outlined in Table 2. This research evaluated each indicator through a series of questions designed to be neutral and solicit honest responses. A summary of

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the responses by indicator is provided in Table 5. The responses were voluntary and self-reported. This data was not inclusive of all California LEA subgrantees.

Data used for this research project did not involve interaction or intervention with living individuals, or the collection of identifiable private information. As a result, this research met the requirements for the Institutional Review Board exclusion.

FINDINGS

A way to identify the number of homeless families in Santa Cruz and Monterey Counties is through HUD's Point-in-Time (PIT) count. The PIT count is a count of sheltered and unsheltered people experiencing homelessness in a single night in January. Each count is planned, coordinated, and carried out locally (HUD, 2020). Over the last four PIT counts the number of homeless families in Santa Cruz County has declined (ASR, 2019b). In 2019, there were a total of 122 families experiencing homelessness in Santa Cruz County, representing a decrease from prior years. Families experiencing homelessness represented 19% of the PIT homeless population (ASR, 2019b).

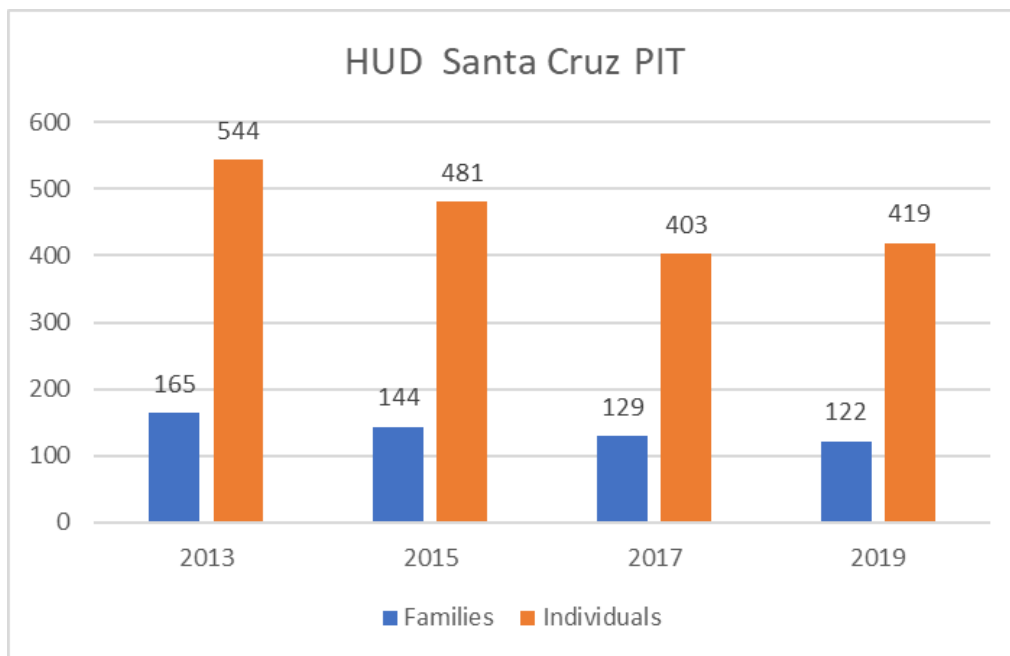
While the number of families decreased slightly, from 129 to 122, the number of family members increased by 4% since 2017 (ASR, 2019a). Slightly more than half (53%) of homeless families were living unsheltered, down from 2017 (68%) (ASR, 2019a). In Monterey County, by contrast, the most recent 2019 PIT count, shows homeless families increased to an all-time high (ASR, 2019a). However, some question the findings since according to Applied Survey Research,

While this is an increase, it must be read in the context of increased participation from the Monterey County Office of Education, allowing for a large increase in the number of districts that shared data and made follow up calls to identify families experiencing homelessness. Ten of the twenty-four school districts in the county participated in 2019, while just one had participated in past years. The HUD PIT count definition was applied in the collection of this increased family data and not the previously mentioned EHCY definition. There were 150 families with 596 family members experiencing homelessness in them (ASR, 2019a).

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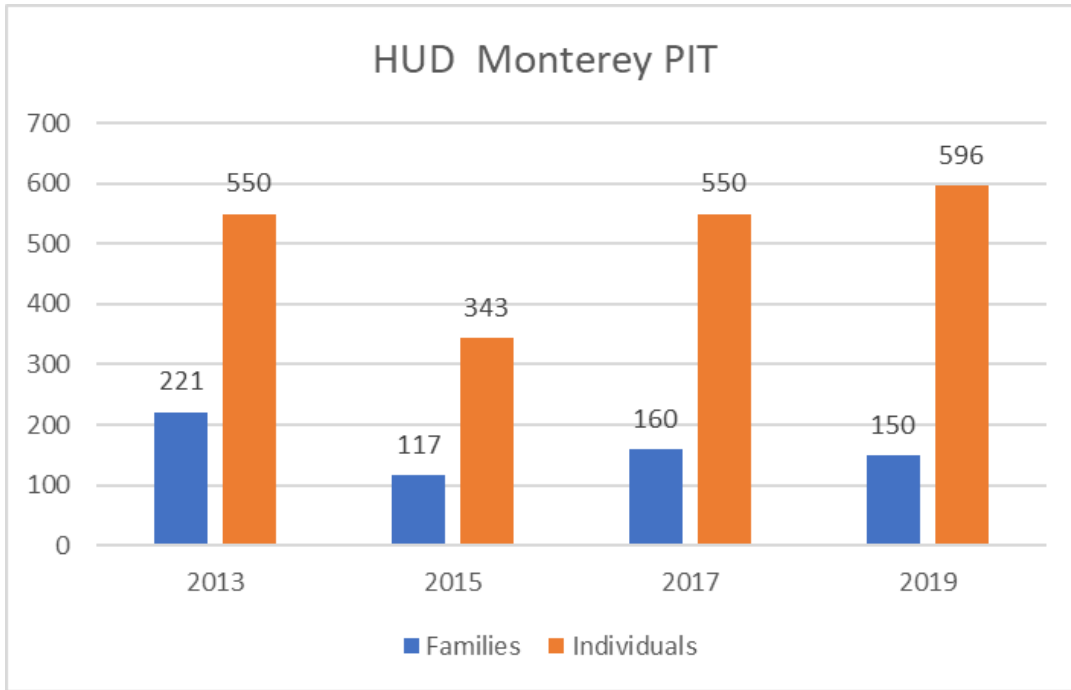
It is also important to note that the PIT data represents the number of homeless families meeting the HUD definition of homelessness, and not EHCY's homeless definition. EHCY's definition is broader than HUD's definition, since it includes children and youths who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; or are abandoned in hospitals (42 U.S.C. § 11301; Samuels, 2010). Under the EHCY definition, the number of families experiencing homelessness would likely be much higher. The data captured from HUD's PIT count from 2013 to 2019 is shown in Figure 1. The PIT data from Santa Cruz County and Monterey County demonstrated the prevalence of homeless families in both counties.

Figure 1: HUD Point-In-Time data for Homeless Families: Santa Cruz



Source: ASR, 2019a.

Figure 2: HUD Point-in-Time Data for Homeless Families: Monterey



Source: ASR, 2019b.

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A comparison of MCOE’s and SCCOE’s EHCY activities against the following standards-based indicators outlined in Table 5 demonstrated how both LEAs fulfilled the legislative intent of the MVHAA.

Table 5: Responses to Program Indicators

Standards and Activity Indicator	MCOE	SCCOE	Compliance
Student Performance Standards			
School Enrollment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Both
Opportunity to Meet Challenging Academic Standards	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Both
Improving/lowering Suspensions	<input checked="" type="checkbox"/>	<input type="checkbox"/>	MCOE
Improving Attendance rates	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Both
Student proficiency measures	<input type="checkbox"/>	<input type="checkbox"/>	Neither
Activities for Preschool and Unaccompanied Students	<input type="checkbox"/>	<input checked="" type="checkbox"/>	SCCOE
LEA Support Standards			
Identification	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Both
Remove Barriers to Enrollment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Both
Ensure Enrollment in School of Origin	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Both
LEA Outreach and Collaboration Standards			
Training and Outreach	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Both
Coordination with Service providers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Both
LEA Program Management Standards			
Use of Statewide Assessment Data	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Both
Program Evaluations	<input type="checkbox"/>	<input type="checkbox"/>	Neither
Data/Information Collection	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Both
Monitor Staffing Changes of LEA	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Both

Source: NCHE, 2017, p. 29.

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The responses provided by the two LEAs demonstrated their commitment to high standards. The program coordinators were given a space on the survey to add any comments or concerns and responses received demonstrated leadership and accountability for the following items:

- Developing awareness about homelessness and HCY
- Attending to basic needs
- Creating an effective homeless education program
- Developing a stable and supportive environment
- Collaborating with other agencies and organizations
- Promoting parental involvement.

The county coordinators provided an exceptional amount of programmatic knowledge and detail in their responses. The county coordinators submitted answers that reinforced the high level of EHCY program quality standards Monterey and Santa Cruz County Offices of Education are administering.

Student Performance Standards

EHCY indicators and standards include a wide array of support activities that provide the basis for enabling academic success. Examining the California School Dashboard and the county performance overview for the both SCCOE and MCOE demonstrate that academic achievement is an area of concern and needs immediate attention. The responses for the student proficiency measures and program evaluations mirrored the data available on the Dashboard. There are only three years of student assessment results available, 2017, 2018, and 2019. The data represents academic performance, academic engagement, and conditions and climate of school performance under the California Accountability System. When searching the website for HCY student outcomes it is clear that students experiencing homelessness are undeservedly underrepresented

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in the data indicators for both counties. MCOE has some achievement data metrics for HCY in 2018 and 2019, SCCOE has achievement data for 2019 on students experiencing homelessness.

Both MCOE and SCCOE provide academic support in the form of tutoring, supplemental instruction, and enriched educational services to foster academic achievement. MCOE and SCCOE provide tutoring services when requested to support students within their counties. SCCOE has developed a partnership with University of California Santa Cruz students to tutor McKinney-Vento students. MCOE uses on-line tutoring sessions to broaden the support provided to students in remote areas of the county.

Both MCOE and SCCOE can improve in providing early childhood educational support to homeless children. MCOE stated that there are no special activities for preschool and unaccompanied youth at this time on a county level, and they will be focusing on preschool during the next academic year. MCOE stated that districts provide services to their unaccompanied youth. SCCOE did not mention any activities for preschool age students, but SCCOE supports unaccompanied and out of school youth through the collaboration and partnership of the Youth Homeless Response Team Program. Youth meet with a case manager who evaluates and supports each individual need.

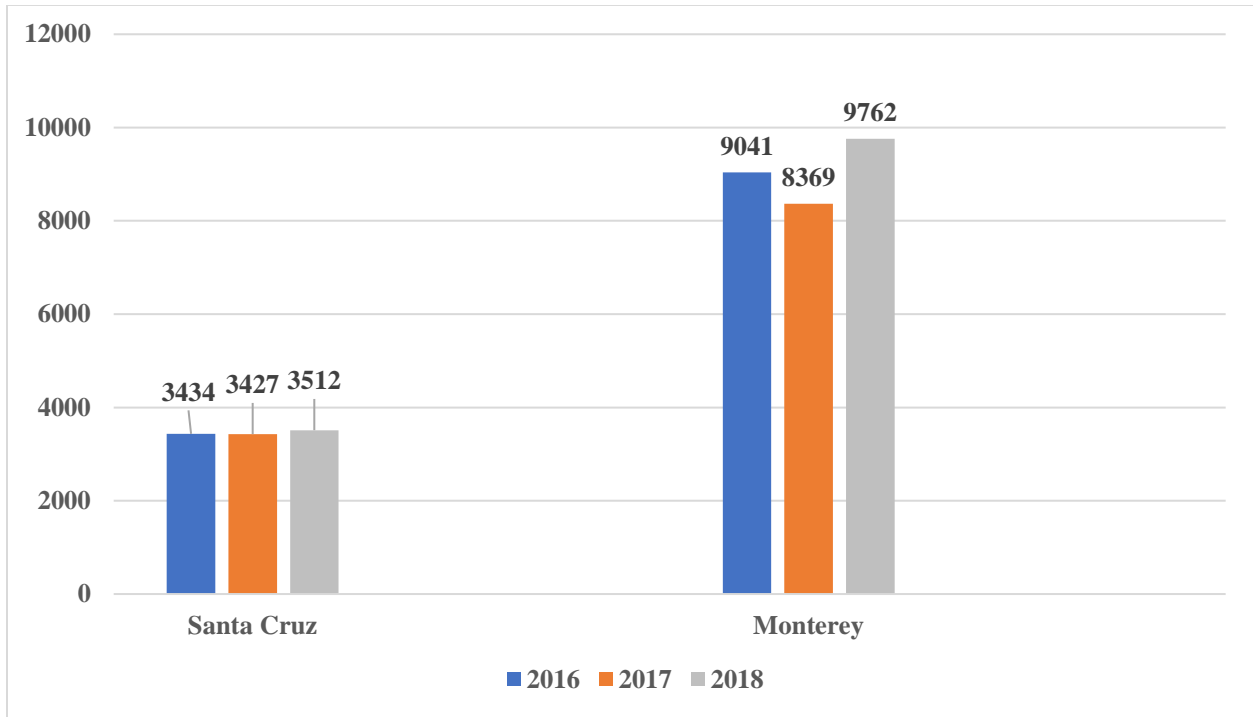
Both counties have creative programs for mentoring and out-of-school programs for HCY. MCOE hosts annual college tours for students in the Spring/Summer. MCOE also has out of school tutoring options for the students who need access to those services. SCCOE has the Students in Transition Program. This program relies heavily on community donations to assist SCCOE in providing the additional supportive services needed by homeless children and youth to promote their success in school, leading to future self-sufficiency.

LEA Support Standards

This research found that the counties met LEA Support Standards. The two counties demonstrated creditable activities to identify students, remove barriers to enrollment, and ensure enrollment in school of origin for HCY. These essential program activities represented the function of how EHCY funding contributed to the achievement of the legislative intent of MVHAA. The LEA Support Standards showed that the counties allowed for the opportunity to have HCY succeed academically.

Both SCCOE and MCOE have adequate processes in place to identify HCY. Both counties confirm that all school districts, including preschools and charter schools, use a residency questionnaire to identify students during enrollment throughout the year. MCOE specifically uses a residency questionnaire and identifies students through statewide databases. Figure 3 shows the number of students identified by both counties who were receiving services for school years 2016, 2017, and 2018. During the 2017-18 school year, school districts in Santa Cruz County identified 3,427 students experiencing various forms of homelessness with their families in thirteen school districts. The school districts identified 3,131 students who were doubled or tripled-up, 175 were living in motels or hotels, 70 were in an emergency or transitional shelter, and 51 were unsheltered. In Monterey County, twenty-five school districts identified 8,369 students, of whom 7,639 students there doubled or tripled-up, 171 were living in motels or hotels, 236 were in an emergency or transitional shelter, and 323 were unsheltered.

Figure 3: County Enrolled HCY by School Year Data



Source: CDE, 2020a

MCOE ensures that school personnel receive information through training, posters, flyers, School House Connection, and National Center for Homeless Education. SCCOE uses the Annual Homeless Student Confidential Survey to include a needs assessment as a primary and comprehensive source to assess homeless children and youth’s needs as they pertain to education and school districts.

If needed, MCOE supports districts and charter schools, if other funding is not available. Considerations include age of the child, amount of travel time, disabilities, and mode of travel available. Transportation is always provided and initiated by the liaisons. MCOE offers bus, MST passes, and gas cards or gas reimbursement. SCCOE supports local school districts when support is requested. SCCOE offers subsidized and free public bus passes for students who

qualify. In most cases each district liaison is knowledgeable about transportation for homeless children/youth and the protected rights.

MCOE stated that parents and guardians are informed of their educational rights and opportunities through information at the schools and by the liaisons. Flyers and brochures can be found at every school and shelter in Monterey County. SCCOE uses the CDE Know Your Rights posters in English and Spanish. Posters are placed at all school sites, public areas, shelters and partner agencies. In addition to the posters, information is posted online within a variety of resource guides located at the library, 211, school sites and the SCCOE.

Both MCOE and SCCOE ensure that costs for tracking, obtaining, and transferring records necessary to enroll HCY in school, including birth certificates, immunization or medical records, academic records, guardianship records, and evaluations for special programs or services, do not pose a barrier to enrollment. If there is an associated cost, the program helps students and parents with the fees or other costs.

LEA Outreach and Collaboration Standards

Both MCOE and SCCOE create and foster collaborations with partners to promote academic success for HCY. MCOE collaborates with Salinas Valley Memorial Hospital and supports HCY with food assistance and helps students obtain clothing. SCCOE's Homeless Coordinator has built relationships with community agencies and keeps continuous communication with them. As a result of these community partnerships the Homeless Coordinator has forged excellent communication systems and relationships with a wide variety of family advocates from shelters, food pantries, health resource centers, and community agencies.

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For Monterey County, school personnel receive information through training, posters, flyers, School House Connection, and National Center for Homeless Education. Posters and brochures can be found in each school, library, and shelter throughout Monterey County. Other activities include trainings, conferences, and meetings. SCCOE accomplishes this activity by serving as an informational hub for the many liaisons, counselors, and principals who deal directly with students attending school and families living in transitional environments. SCCOE offers training sessions to these liaisons, as well as informational materials to help reach and support disadvantaged students.

MCOE has a close partnership with Monterey County Behavioral Health department. SCCOE addresses the needs of the whole child and family through collaborative efforts with schools, social service providers, institutions of higher learning, private nonprofits, local business and industry, and the community at large. MCOE and SCCOE work closely with parents and guardians to refer them to agencies that deal with confidential information and programs, such as Domestic Violence shelters.

MCOE works with the Coalition of Homeless Service Providers in Monterey County to support families during emergency situations. SCCOE works closely with the Youth Homeless Demonstration Program (YHDP) and all school district student services directors to further assess these needs. One hundred percent of the community donations to SCCOE are used to support the needs of homeless students. Items purchased and donated have included school supplies, backpacks, clothes, shoes, scholarships, and various other items needed by homeless children to promote their academic achievement and well-being.

LEA Program Management Standards

The management practices of both counties are nearly identical in the way that they manage data/information collection, monitor staffing changes of LEAs, and use statewide assessment data. The counties have room for improvement in the management practice of program evaluations. Both counties relied on CALPADS database from CDE to collect and share data with the state and other LEAs. MCOE recorded school district liaison records, including dates of last trainings and meetings. The counties contact all school districts in their county to keep their school district liaison records current. Information regarding the school district liaison is published on the counties' websites. MCOE and SCCOE also depended on the California Dashboard database to identify the needs of student assessments in their counties. Both counties did not conduct program evaluations to determine their effectiveness at meeting the needs of students. This is an area of needed improvement, possibly with guidance from CDE.

MCOE offers five different training opportunities to school districts: Foster/Homeless Training in the fall; an annual conference in the fall called Ensuring Success for Children and Youth Experiencing Homelessness, which is open to all district and charter school staff members and local stakeholders; training with individual districts and charter schools as requested; online licenses for districts on McKinney-Vento training provided through Kickstand; and a Foster and Homeless Youth Education Summit in June.

SCCOE offers five different training opportunities to school districts as well: know your rights training for parents in English and Spanish; trauma informed practices workshop for school staff and liaisons; training regarding understanding the rights of parents under EHCY/ESSA; training regarding roles and responsibilities of homeless liaisons; and an EHCY/ESSA 101 full day workshop.

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MCOE collaborates with the Department of Social Services, Community Human Services, The Coalition of Homeless Service Providers, S.C.O.R.E., Community Action Commission, Street Outreach in Chinatown, Salinas Valley Memorial Hospital, and United Way. MCOE has also joined with three other COEs to start a collaborative with all California COEs. SCCOE works with a wide range of community-based initiatives to coordinate efforts to identify and assist the homeless children and youth of Santa Cruz County. These linkages assist in heightening public awareness to the needs of homeless children and youth, remove potential barriers to homeless children and youth in accessing educational and other opportunities; enhance communication between schools and service providers; and in the development of new policies or programs to address the needs of homeless students.

EHCY Funding Based on Identified Homeless Children and Youth

Both Santa Cruz County Office of Education (SCCOE) and Monterey County Office of Education (MCOE) are in their second year of the three-year grant cycle supported by the EHCY program. The numbers listed in Table 6 are the yearly EHCY funding allotment based on the identified HCY in their counties.

Table 6: EHCY Grant Award Allocations

County	Enrolled HCY	Maximum Funding Amount
Monterey County Office of Education	Over 5000 students	\$250,000
Santa Cruz County Office of Education	2,501–5,000 students	\$175,000

Source: CDE, 2020a

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With EHCY funding, both counties supported the academic and non-academic needs of students experiencing homelessness. The four categories of program standards reviewed demonstrated how the LEAs have contributed to their EHCY programs to remove barriers for students experiencing homelessness in line with MCHAA's legislative intent.

ANALYSIS

Receiving an EHCY subgrant indicates that the LEA has a heightened awareness of the problems facing students experiencing homelessness, and the LEA recognizes that with the right program standards put into action to support students at the right time, HCY will have successful futures. Moreover, receiving an EHCY subgrant not only provides financial assistance to LEAs, but also provides them a form of reassurance. The current programs that assist homeless families have an obligation to provide enough readily available services in order to meet the demand. This is of particular importance in Santa Cruz and Monterey county schools, which enrolled thirteen thousand HCY in 2018, according to the PIT count. Through continued policy development, LEAs and countywide agencies can partner effectively with service provider programs and work towards supporting impoverished families and HCY.

The two county LEAs surveyed understand that school and educational communities can have a nurturing affect, and develop a sense of stability and normalcy for students experiencing homelessness. While effectively leveraging CDE's consolidated state plan, this research revealed the association with receiving a subgrant and the delivery of services to fulfill MVHAA's legislative intent. The counties are successfully managing their grant programs and aligning their homeless educational programs with the key areas of CDE's ESSA state plan. Both LEAs have developed comprehensive methods for identification of their target populations of EHYC, and have streamlined their process of creating awareness, training, and tracking systems.

HCY will be invisible without data and information tracking homeless students' academic performance. The academic well-being of students experiencing homelessness is one of the core values of MVHAA & ESSA. It is also a limitation of the research, since both MCOE and SCCOE had scarce information on homeless students' academic achievement. The

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California School Dashboard will eventually be a useful tool for aggregating enough years of data to demonstrate progress or lack of progress towards academic success. What LEAs must do in the meantime is work closely with CDE to verify any pupil achievement and pupil engagement data that the state may have. Tracking proficiency and graduation rates of students experiencing homelessness can be a statewide activity, but must be implemented locally. Local tracking of improved attendance rates, increased school enrollment, and reduced grade repetition will be beneficial to understand EHCY's overall success in LEAs that receive its funding. With that data, counties will be able to test the core value of MVHAA, and conduct a program evaluation to see whether the federal and state mandates are actually guaranteeing academic success for students experiencing homelessness. Educational equity is crucial to raising student achievement, but if there is no data on HCY pupil achievement then there is no way to effectively monitor the success of their engagement with school services.

For the 2017-2018 school year, ESSA started requiring all SEA and LEA with significant numbers of HCY to submit data on academic achievement and 4-year Adjusted Cohort Graduation Rates (ACGR). The ACGR examines the number of students who graduate in four, five, or six years after starting 9th Grade. The ACGR of students experiencing homelessness is a federal EHCY program indicator that will bring valuable data and information to ED, CDE, and LEA. Data on socioeconomically disadvantaged students was assessed to determine the number of students who may be impacted by this evaluation. The economic data outlined in the table below represents another subgroup that was represented in both counties in 2018 and 2019. It will be important to evaluate their academic achievement data further, once available.

Table 7: Socioeconomically Disadvantaged Students

Cumulative Enrollment	2016-2017	2017-2018	2018-2019
SCCOE	21,871	23,158	Not publicly released
MCOE	59,625	61,949	Not publicly released

Source: Ed-Data.org, 2020, n.p.

Many of the socioeconomically disadvantaged students are living in households below the federal poverty level due to the unavailability of affordable housing. The group is highlighted because many of those students might be going unidentified as McKinney-Vento students. There is a likelihood that socioeconomically disadvantaged students meet the eligibility requirement of living in one of these types of dwellings: temporary shelters, temporarily doubled-up, hotels/motels, and temporarily unsheltered. This student subgroup is another area of examination that both SCCOE and MCOE should explore. The number of economically disadvantaged students surpassing the previous years' total shows that there is a trend of more families living below the poverty level for both counties, and the students may be eligible for McKinney-Vento educational services. They would not receive the services unless the LEA or the school they attend identifies them.

It is also important to note that the numbers of homeless students reported by LEAs are probably an underestimate of the magnitude of HCY. The numbers represent the students who are identified as experiencing homelessness and are registering for school. The MVHAA and ESSA require all LEAs to notify and identify students experiencing homelessness. There are currently gaps in identifying students who have a homeless experience in the summertime, youth that who drop out of school, and young children who are not enrolled in an early head-start or preschool program. There also needs to be a provision of protection for when HCY are on

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summer break. LEAs can lead the effort to ensure that these areas are addressed on the local level with guidance from CDE.

While MCOE and SCCOE have attempted to remove barriers to academic achievement by implementing tutoring programs, such as on-line tutoring for remote students, a thorough assessment into the needs of HCY must be conducted to successfully run such programs. For example, on-line tutoring is a great resource for students who have access to computers and internet. However, when HCY are disadvantaged socioeconomically, it may not be feasible for them to access on-line tutoring if they do not have the technology like laptops, tablets, or high-speed internet. The critical importance of eliminating this technology limitation was highlighted by the gift of \$10 million to the Oakland School District by Jack Dorsey of Twitter. The Oakland District had noted that many of their students are low income, and “disconnected or underconnected to technology at home” (Serrano, 2020, n.p.) Such a statement would be even more true of a homeless child or youth.

Attempting to prevent the negative effects that homelessness has on HCY is the number one researched area with respect to students experiencing homelessness. There is a scarcity of literature on compliance of LEAs that are EHCY recipients. The current landscape of research that exists focuses on the negative impact risk factors that homelessness has on children and youth. More research is needed to support advocates and legislators when more EHCY funding is needed and requested on behalf of the states. If there is not research on what is working well with LEAs that are currently receiving funding, then why should additional monies be apportioned to EHCY programs? Since funding allows LEAs to identify HCY and provide them with services, it consequently means that the lack of funding limits the ability of LEAs to identify homeless students, ensure their access to school, and connect them to community

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supports. If the challenge of meeting the educational needs of families experiencing homelessness is to be overcome in an efficient and cost-effective manner, federal and state policies must work together to administer the programs serving the HCY population.

The next progression of research on MVHAA and ESSA should shift towards building a consensus on implementing LEA-based collaborative resource systems. That is, building the community services around the students, parents, and the school to address and respond to the rapidly changing needs of HCY. With the ever-changing economic landscape, the importance of MVHAA and ESSA provisions are critical to combat the cycle of poverty for families, children, and youth in California.

CONCLUSION

Students experiencing homelessness represents an inequity that can be eliminated with educational nurturing and protection of their rights. The most qualified teacher and the most exceptional math or reading program will not benefit children and youth who are not assisted to overcome barriers to their school attendance caused by homelessness. If HCY are unidentified and not supported, then their future income and economic independence will be in jeopardy. An investment in HCY is an investment in the future of America.

Enhanced funding to support more LEAs each year would further the goals of the MVHAA. As seen with MCOE and SCCOE, EHCY allowed LEAs to focus on removing barriers for HCY. The two counties implemented programming and conducted activities to deliver services to HCY. Both counties met compliance requirements of the Act and adopted innovative strategies to serve the needs of HCY. If more LEAs become subgrantees, then they may further the goals of the MVHAA and continue to work towards meeting the legislative intent through the EHCY program in even more areas, benefitting even more HCY.

To help HCY succeed in school, educational and housing systems must align to support this population. When these systems collaborate, families, children, and youth thrive in society and receive the help and services they need. No child, youth, or parent should have to feel socially excluded in society or school due to a homeless experience. Homelessness should not be a barrier to academic achievement. While provision of housing is the responsibility of other agencies, LEA, using MVHAA effectively, can remove the barrier to educational attainment.

ABBREVIATIONS LIST

ACGR = Adjusted Cohort Graduation Rates

CDE = California Department of Education

ED = United States Department of Education

EHCY = Education for Homeless Children and Youth

ESEA = Elementary and Secondary Education Act

ESSA = Every Student Succeeds Act

HCY = Homeless Children and Youth

HUD = Department of Housing and Urban Development

LEA = Local Educational Agencies

MCOE = Monterey County Office of Education

MVHAA = McKinney-Vento Homeless Assistance Act

PIT = Point-In-Time

SCCOE = Santa Cruz County Office of Education

SEA = State Educational Agencies

USICH = United States Interagency Council on Homelessness

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APPENDIX A

NCHE Crosswalk of Standards and McKinney-Vento Provisions: <https://nche.ed.gov/monitoring-and-evaluation/>

Student Performance Standards

1. All homeless students participate fully in school.

“Statement of Policy – Homeless children and youths should have access to the education and other services that such children and youths need to ensure that such children and youths have an opportunity to meet the same challenging State academic standards to which all students are held.” [42 U.S.C. § 11431(4)]

State Plan – Must include

- “A description of how homeless children and youths are (or will be) given the opportunity to meet the same challenging State academic standards as all students are expected to meet” [42 U.S.C. § 11432(g)(1)(A)];
- “A description of procedures that ensure that... [homeless] youths ... and youths separated from public schools are identified and accorded equal access to appropriate secondary education and support services, including by identifying and removing barriers that prevent youths described in this clause from receiving appropriate credit for full or partial coursework satisfactorily completed while attending a prior school ... “[42 U.S.C. § 11432(g)(1)(F)]

2. All homeless students show academic progress.

LEA Liaisons – “Each local educational agency liaison for homeless children and youths ... shall ensure that ... homeless children and youths are enrolled in and have a full and equal opportunity to succeed in, schools of that local educational agency.” [42 U.S.C. § 11432(g)(6)(A)(ii)]

LEA Support Standards

3. The LEA identifies all homeless children and youth through outreach to all homeless children and youth and to specific subgroups including preschool-aged children, unaccompanied homeless youth, out of school youth, and migrant children and youth.

LEA Liaison Requirements – Liaisons must “ensure that ...homeless children and youths are identified by school personnel through outreach and coordination activities with other entities and agencies.” [42 U.S.C. § 11432(g)(6)(A)(i)]

4. The LEA removes barriers to enrollment for homeless students.

State Plan Requirements –

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- Must include “[s]trategies to address other problems with respect to the education of homeless children and youths, including problems resulting from enrollment delays that are caused by – (i) requirements of immunization and other required health records; (ii) residency requirements; (iii) lack of birth certificates, school records, or other documentation; (iv) guardianship issues; or (v) uniform or dress code requirements; [42 U.S.C. § 11432(g)(1)(H)]
- Must demonstrate that the SEA and LEAs in the State “have developed, and shall review and revise, policies to remove barriers to the identification of homeless children and youths, and the enrollment and retention of homeless children and youths, including barriers to enrollment and retention due to outstanding fees or fines, or absences.” [42 U.S.C. § 11432(g)(1)(I)]

LEA Requirements – Immediate enrollment –

- (i) The school selected in accordance with this paragraph shall immediately enroll the homeless child or youth, even if the child or youth – (I) is unable to produce records normally required for enrollment, such as previous academic records, records of immunization and other required health records, proof of residency, or other documentation; or (II) has missed application deadlines during any period of homelessness.
- (ii) The enrolling school shall immediately contact the school last attended by the child or youth to obtain relevant academic and other records.
- (iii) If the child or youth needs to obtain immunizations or other required health records, the enrolling school shall immediately refer the parent or guardian of the child or youth or (in the case of an unaccompanied youth) the youth to the local educational agency liaison ... who shall assist in obtaining necessary immunizations or screenings, or immunization or other required health records, in accordance with subparagraph D. [42 U.S.C. § 11432(g)(3)(C)]

LEA Requirements – Any record ordinarily kept by the school ... regarding each homeless child shall be maintained so that the records involved are available, in a timely fashion, when a child or youth enters a new school or school district. [42 U.S.C. § 11432(g)(3)(D)]

5. LEA maintains all homeless students in their school of origin when in their best interest.

LEA Requirements –

- “The local educational agency serving each child or youth to be assisted under this part shall, according to the child’s or youth’s best interest (i) continue the child’s or youth’s education in the school of origin for the duration of homelessness (I) in any case in which a family becomes homeless between academic years or during an academic year; and (II) for the remainder of the academic year, if the child or youth becomes permanently housed during an academic year; or (ii) enroll the child or youth in any public school that nonhomeless students who live in the attendance area in which the child or youth is actually living is are eligible to attend.” [42 U.S.C. § 11432(g)(3)(A)]
- “The term ‘school of origin’ means the school that a child or youth attended when permanently housed or the school in which the child or youth was last enrolled, including a preschool.” [42 U.S.C. § 11432(g)(3)(I)(i)]

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- “When the child or youth completes the final grade level served by the school of origin...the term ‘school of origin’ shall include the designated receiving school at the next grade level for all feeder schools.” [42 U.S.C. § 11432(g)(3)(I)(ii)]
- “In determining the best interest of the child or youth under subparagraph (A), the local educational agency shall (i) presume that keeping the child or youth in the school of origin is in the child’s or youth’s best interest, except when doing so in contrary to the request of the child’s or youth’s parent or guardian, or (in the case of an unaccompanied youth) the youth; (ii) consider student-centered factors related to the child’s or youth’s best interest ...; (iii) if, after conducting the best interest determination based on consideration of the presumption in clause (i) and the student-centered factors in clause (ii), the local educational agency determines that it is not in the best child’s or youth’s best interest to attend the school of origin or the school requested by the parent or guardian, or (in the case of an unaccompanied youth) the youth, provide the child’s or youth’s parent or guardian or the unaccompanied youth with a written explanation of the reasons for its determination, in a manner and form understandable to such parent, guardian, or unaccompanied youth, including information regarding the right to appeal...”[42 U.S.C. § 11432(g)(3)(B)]

6. The LEA provides homeless students all educational services for which they are eligible.

State Plan Requirements – State plans must include:

- “A description of how such children and youths are (or will be) given the opportunity to meet the same challenging State academic standards as all students are expected to meet.” [42 U.S.C. § 11432(g)(1)(A)]
- “A description of procedures that ensure that homeless children and youths who meet the relevant eligibility criteria are able to participate in Federal, State, or local nutrition programs.” [42 U.S.C. § 11432(g)(1)(E)]
- “A description of procedures that ensure that— (i) homeless children have access to public preschool programs, administered by the State educational agency or local educational agency, as provided to other children in the State; (ii) [homeless] youths...and youths separated from the public schools are identified and accorded equal access to appropriate secondary education and support services, including by identifying and removing barriers that prevent youths described in this clause from receiving appropriate credit for full or partial coursework satisfactorily completed while attending a prior school, in accordance with State, local, and school policies; and (iii) homeless children and youths who meet the relevant eligibility criteria do not face barriers to accessing academic and extracurricular activities, including magnet school, summer school, career and technical education, advanced placement, on-line learning, and charter school programs, if such programs are available at the State and local levels.” [42 U.S.C. § 11432(g)(1)(F)]
- “Assurances that...[t]he State educational agency and local educational agencies in the State will adopt policies and practices to ensure that homeless children and youths are not stigmatized or segregated on the basis of their status as homeless.” [42 U.S.C. § 11432(g)(1)(J)(i)]
- “Assurances that...[t]he State and the local educational agencies in the State will adopt policies and practices to ensure that transportation is provided, at the request of the parent or guardian (or in the case of an unaccompanied youth, the liaison), to and from the school of origin...” [42 U.S.C. § 11432(g)(1)(J)(iii)]

LEA Liaison Requirements – Each LEA liaison must ensure that unaccompanied youths (I) are enrolled in school; (II) have opportunities to meet the same challenging State academic standards as the State establishes for other children and youth; and (III) are informed of their

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status as independent students and that the youths may obtain assistance from the LEA liaison to receive verification of such status for purposes of the Free Application for Federal Student Aid. [42 U.S.C. § 11432(g)(6)(A)(x)]

LEA Liaison Duties – Must ensure that "the parent or guardian of a homeless child or youth, and any unaccompanied youth, is fully informed of all transportation services, including transportation to the school of origin ... and is assisted in accessing transportation to the school that is selected..." [42 U.S.C. § 11432(g)(6)(A)(viii)]

LEA Outreach and Collaboration Standards

7. The LEA links homeless students and their families to community services.

LEA Liaison Duties – Must ensure that “homeless families and homeless children and youths have access to and receive educational services for which such families are eligible, including services through Head Start programs (including Early Head Start programs) ..., early intervention services under part C of the Individuals with Disabilities Education Act. ..., and other preschool programs administered by the local educational agency” [42 U.S.C. § 11432(g)(6)(A)(iii)] and that “homeless families and homeless children and youths receive referrals to health care services, dental services, mental health and substance abuse services, housing services, and other appropriate services.” [42 U.S.C. § 11432(g)(6)(A)(iv)]

8. The LEA informs all parents and guardians of homeless children and youth of the educational and related opportunities available to their children and of meaningful opportunities to participate in their children’s education; and
9. The LEA informs all unaccompanied homeless youth of the educational and related opportunities available to them.

LEA Liaison Duties – Must ensure that

- “the parents or guardians of homeless children and youths are informed of the educational and related opportunities available to their children and are provided with meaningful opportunities to participate in the education of their children;” [42 U.S.C. § 11432(g)(6)(A)(v)]
- “public notice of the educational rights of homeless children and youths is disseminated in locations frequented by parents or guardians of such children and youths, and unaccompanied youths, including schools, shelters, public libraries, and soup kitchens, in a manner and form understandable to the parents and guardians of homeless children and youths, and unaccompanied youths;” [42 U.S.C. § 11432(g)(6)(A)(vi)] and that
- “the parent or guardian of a homeless child or youth, and any unaccompanied youth, is fully informed of all transportation services, including transportation to the school of origin ... and is assisted in accessing transportation to the school that is selected...”[42 U.S.C. § 11432(g)(6)(A)(viii)]

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10. The LEA conducts awareness activities for educators and community service providers regarding the rights and needs of homeless children and youth.

State Plan Requirements – Must include “[a] description of programs for school personnel (including liaisons designated under subparagraph (J)(ii), principals and other school leaders, attendance officers, teachers, enrollment personnel, and specialized instructional support personnel) to heighten the awareness of such personnel of the specific needs of homeless children and youths, including such children and youths who are runaway and homeless youths.” [42 U.S.C. § 11432(g)(1)(D)]

Coordination Purpose – “The coordination required under subparagraphs (A) and (B) shall be designed to ... raise the awareness of school personnel and service providers of the effects of short-term stays in a shelter and other challenges associated with homelessness.” [42 U.S.C. § 11432(g)(5)(C)(iii)]

11. LEAs coordinate and collaborate with programs within the LEA to increase identification of homeless students, plan support activities, align procedures and practices, and leverage resources.

Coordination Purpose – The coordination required under subparagraphs (A) and (B) shall be designed to – (i) ensure that all homeless children and youths are promptly identified; (ii) ensure that all homeless children and youths have access to, and are in reasonable proximity to, available education and related support services ... [42 U.S.C. § 11432(g)(5)(C)]

Homeless Children and Youths with Disabilities – For children and youths who are to be assisted both under this subtitle, and under the IDEA ... each LEA “shall coordinate the provision of services under this part with the provision of programs for children with disabilities served by that local educational agency and other involved local educational agencies.” [42 U.S.C. § 11432(g)(5)(D)]

Title I Requirements – An LEA receiving Title I, Part A funds must include in its local plan a description of how the plan is coordinated with the McKinney-Vento Act; the local plan must describe services provided to homeless children. [20 U.S.C. § 6312(a)(1)(B) and (b)(6)]

12. LEAs coordinate and collaborate with community agencies, organizations, and business partners to deliver comprehensive services in an efficient manner, expand or leverage resources, and participate in policy discussions.

Coordination – Each LEA serving homeless children and youths shall coordinate “the provision of services under this part with local social services agencies and other agencies or entities providing services to homeless children and youths and their families, including services and programs funded under the Runaway and Homeless Youth Act.” [42 U.S.C. § 11432(g)(5)(A)]

Coordination with Housing Assistance – If applicable, each SEA and LEA “shall coordinate with State and local housing agencies responsible for developing the comprehensive housing affordability strategy described in section 12705 [the Cranston Gonzalez National Affordable Housing Act] of this title to minimize educational disruption for children and youth who become homeless.” [42 U.S.C. § 11432(g)(5)(B)]

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LEA Program Management Standards

13. The LEA local liaison has sufficient time, training, and support to carry out his or her duties.

State Plan Requirement: Must provide assurances that the LEAs will designate an appropriate staff person, able to carry out the duties of the local liaison [42 U.S.C. § 11432(g)(1)(J)(ii)] and that the State and LEAs in the State will adopt policies and practices to ensure participation by liaisons in professional development and other technical assistance activities as determined appropriate by the Office of Coordinator. [42 U.S.C. § 11432(g)(1)(J)(iv)]

Each LEA liaison shall ensure that school personnel providing services under this subtitle receive professional development and other support. [42 U.S.C. § 11432(g)(6)(A)(ix)]

14. The LEA has policies and procedures that remove educational barriers for homeless children and youth.

Statement of Policy – “In any State where compulsory residency requirements or other requirements, in laws, regulations, practices, or policies, may act as a barrier to the identification of, or the enrollment, attendance, or success in school of homeless children and youths, the State educational agency and local educational agencies in the State will review and undertake steps to revise such laws, regulations, practices, or policies to ensure that homeless children and youths are afforded the same free, appropriate public education as provided to other children and youths.” [42 U.S.C. § 11431(2)]

State Plan Requirements – Must include

- A description of the procedures the SEA will use to identify homeless children and youth and assess their needs;
- A description of procedures that ensure that homeless children and youths who meet the relevant eligibility criteria are able to participate in Federal, State, or local nutrition programs;
- A description of procedures that ensure that homeless children have access to public preschool programs;
- A description of procedures that ensure that homeless youths and youths separated from public school are accorded equal access to appropriate education and support services and do not face barriers to receiving appropriate credit for full or partial coursework satisfactorily completed while attending a prior school;
- A description of procedures that ensure that homeless children and youth who meet relevant eligibility criteria do not face barriers to accessing academic and extracurricular activities, including magnet school, summer school, career and technical education, advanced placement, online learning, and charter school programs;
- A demonstration that the SEA and LEAs in the State have developed, and shall review and revise, policies to remove barriers to the identification of homeless children and youths, and the enrollment and retention due to outstanding fees or fines, or absences;
- Assurances that the SEA and LEAs in the State will adopt policies and practices to ensure that transportation is provided at the request of a parent or guardian (or in the case of an unaccompanied youth, the liaison) to and from the school of origin. [42 U.S.C. § 11432(g)(1)]

LEA Requirements – Privacy – Information about a homeless child’s or youth’s living situation shall be treated as a student education record, and shall not be deemed to be directory information. [42 U.S.C. § 11432(g)(3)(G)]

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Review and Revisions – (A) Each SEA and LEA shall review and revise any policies that may act as barriers to the identification of homeless children and youths or the enrollment of homeless children and youths in schools selected under paragraph (3); (B) In reviewing and revising such policies, consideration shall be given to issues concerning transportation, immunization, residency, birth certificates, school records and other documentation, and guardianship; (C) Special attention shall be given to ensuring the identification, enrollment, and attendance of homeless children and youths who are not currently attending school. [42 U.S.C. § 11432(g)(7)]

State Plan – Must include a description of procedures for the prompt resolution of disputes regarding the educational placement of homeless children and youths. [42 U.S.C. § 11432(g)(1)(C)]

LEA Requirements – If a dispute arises over eligibility, or school selection or enrollment in a school – (i) the child or youth shall be immediately enrolled in the school in which enrollment is sought, pending final resolution of the dispute, including all available appeals; (ii) the parent or guardian of the child or youth or (in the case of an unaccompanied youth) the youth shall be provided with a written explanation of any decisions related to school selection or enrollment made by the school, the LEA, or the SEA involved, including the rights of the parent, guardian, or unaccompanied youth to appeal such decisions; (iii) the parent, guardian, or unaccompanied youth shall be referred to the LEA liaison designated under paragraph (1)(J)(ii), who shall carry out the dispute resolution process as described in paragraph (1)(C) as expeditiously as possible after receiving notice of the dispute, and (iv) in the case of an unaccompanied youth, the liaison shall ensure that the youth is immediately enrolled in the school in which the youth seeks enrollment pending resolution of such dispute. [42 U.S.C. § 11432(g)(3)(E)]

LEA Liaison Duties – Must ensure that ... enrollment disputes are mediated in accordance with paragraph (3)(E). [42 U.S.C. § 11432(g)(6)(A)(vii)]

State Plan Requirements – Must provide assurances that the State and the LEAs in the State will adopt policies and practices to ensure that transportation is provided, at the request of the parent or guardian (or in the case of an unaccompanied youth, the liaison), to and from the school of origin. [42 U.S.C. § 11432(g)(1)(J)]

15. The LEA provides professional development and other support to school personnel serving homeless children and youth.

Each LEA liaison shall ensure that school personnel providing services under this subtitle receive professional development and other support. [42 U.S.C. § 11432(g)(6)(A)(ix)]

16. The LEA utilizes data for needs assessment and program planning.

“Consideration should be given to the number of LEAs in the State or schools and students in the district; the number of identified homeless students in the State or district as a percentage of students living in poverty; the number of LEAs identifying zero homeless students; and recent Department and State monitoring findings.” [ED, 2017, p.15]

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References:

Elementary and Secondary Education Act of 1965, Title IX – Education for the Homeless and Other Laws (Subtitle VII-B of the McKinney-Vento Homeless Assistance Act, 42 U.S.C. §§ 11431-11434A). Retrieved August 2017 from <http://uscode.house.gov/view.xhtml?path=/prelim@title42/chapter119/subchapter6/partB&edition=prelim>

U.S. Department of Education. (2016). *Education for Homeless Children and Youth Program Non-Regulatory Guidance*. Retrieved August 2017 from <http://www2.ed.gov/policy/elsec/leg/essa/160240ehcyguidance072716.pdf>

APPENDIX B

Crosswalk between Activity Indicators in the NCHE LEA Informal Needs Assessment Tool and NCHE EHCY Program Standards

Activity Indicators	Related Standard
Awareness	8. The LEA informs all parents and guardians of homeless children and youth of the educational and related opportunities available to their children and of meaningful opportunities to participate in their children’s education. 9. The LEA informs all unaccompanied homeless youth of the educational and related opportunities available to them. 10. The LEA conducts awareness activities for educators and community service providers regarding the rights and needs of homeless children and youth.
Policies and Procedures	14. The LEA has policies and procedures that remove educational barriers for homeless children and youth.
Disputes	14. The LEA has policies and procedures that remove educational barriers for homeless children and youth.
Identification	3. The LEA identifies all homeless children and youth through outreach to all homeless children and youth and to specific subgroups including preschool-aged children, unaccompanied homeless youth, out of school youth, and migrant children and youth.
Enrollment	4. The LEA removes barriers to enrollment for homeless students.
School Selection	5. LEA maintains all homeless students in their school of origin when in their best interest.
Access to Services	6. The LEA provides homeless students all educational services for which they are eligible. 7. The LEA links homeless students and their families to community services.
Transportation	6. The LEA provides homeless students all educational services for which they are eligible. 7. The LEA informs all parents and guardians of homeless children and youth of the educational and related opportunities available to their children and of meaningful opportunities to participate in their children’s education.
School Success	1. The LEA informs all parents and guardians of homeless children and youth of the educational and related opportunities available to their children and of meaningful opportunities to participate in their children’s education. 2. The LEA informs all unaccompanied homeless youth of the educational and related opportunities available to them.
Collaboration within the LEA	11. LEAs coordinate and collaborate with programs within the LEA to increase identification of homeless students, plan support activities, align procedures and practices, and leverage resources.
Collaboration with Title I	11. LEAs coordinate and collaborate with programs within the LEA to increase identification of homeless students, plan support activities, align procedures and practices, and leverage resources.
Community Collaboration	12. LEAs coordinate and collaborate with community agencies, organizations, and business partners to deliver comprehensive services in an efficient manner, expand or leverage resources, and participate in policy discussions.
Resources and Capacity	13. The LEA local liaison has sufficient time, training, and support to carry out his or her duties. 14. The LEA has policies and procedures that remove educational barriers for homeless children and youth. 15. The LEA provides professional development and other support to school personnel serving homeless children and youth. 16. The LEA utilizes data for needs assessment and program planning.

Source: NCHE LEA Informal Needs Assessment Tool: <https://nche.ed.gov/monitoring-and-evaluation/>

APPENDIX C

Standards, Assessment and Accountability Survey

The purpose of the *McKinney-Vento Homeless Assistance Act* is to ensure that all homeless children and youth have equal access to the same free, appropriate public education, including public preschool education, provided to other children and youth. The primary focus of this program is to facilitate the enrollment, attendance, and success in school of homeless children and youth.

The information collected will guide the findings and analysis of this Thesis project. This will be used as the baseline for your McKinney-Vento program. The following checklist is used in the evaluation of a LEAs activities and procedures. Program compliance and/or effectiveness is determined based on responses and supporting evidence for each of the monitoring questions. Each section contains several monitoring questions that will be evaluated individually.

Please note that in some cases, a yes or no answer will be sufficient. Additionally, only documentation for the current or last school year should be applied to this document

Thank you for taking the time to complete this assessment.

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Guiding Questions LEA	Acceptable LEA Evidence Documentation	Probing Questions Interview	LEA Response	Is sufficient documentation provided?
<p>1.1a How does the LEA collect local data and transmit information requested on homeless students to the SEA?</p>	<ul style="list-style-type: none"> The most recent copy of any evaluation reports of McKinney-Vento services or subgrant project. Written documentation or summaries of homeless students' primary nighttime residence. Analysis of identification rate compared to total free meal eligibility. 	<ul style="list-style-type: none"> How does the LEA identify students who are homeless and enter the data in the student management system? Does the LEA use a residency questionnaire during enrollment and during back-to school activities? What activities are performed to verify accuracy of data for students experiencing homelessness? 	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p>Comments:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p>Comments:</p>
<p>1.1b How does the LEA ensure that homeless students are included in statewide assessments?</p>	<ul style="list-style-type: none"> Reports of statewide assessment performance of homeless students enrolled in the LEA for the last school year. Disaggregated performance by homeless flag. 	<ul style="list-style-type: none"> How does the LEA use statewide assessment data to identify needs of students experiencing homelessness? 	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p>Comments:</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p>Comments:</p>
<p>1.1c Does the LEA conduct program evaluations to determine its effectiveness?</p>	<ul style="list-style-type: none"> Most recent reports of statewide assessment performance of homeless students enrolled in the LEA for the last school year. 	<ul style="list-style-type: none"> Are student academic outcomes addressed in the LEA's McKinney-Vento subgrant applications and annual reports? How are these data used for program improvement? 	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p>Comments:</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p>Comments:</p>
<p>1.1d What process/practices does the LEA have in place to ensure</p>	<ul style="list-style-type: none"> School Report Card, data analysis, meeting minutes, 	<ul style="list-style-type: none"> Is the information available and up to date in 	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p>Comments:</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A</p> <p>Comments:</p>

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McKinney-Vento students are achieving and/or reaching proficiency? How does your program address the gaps?	interview with District Assessment Coordinator (DAC)	the California <i>DASHBOARD</i> ?		
1.1.e How does the attendance rate of McKinney-Vento children and youth compare to the state average? How does your program address the gaps?	<ul style="list-style-type: none"> School Report Card, data analysis, meeting minutes, interview with District Assessment Coordinator (DAC) 	<ul style="list-style-type: none"> Is the information available and up to date in the California <i>DASHBOARD</i>? 	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Comments:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Comments:
1.1.f How does the rate of disciplinary referrals and suspensions for McKinney-Vento students and youth compare to the state average? How does your program address the gaps?	<ul style="list-style-type: none"> School Report Card, data analysis, meeting minutes, interview with District Assessment Coordinator (DAC) 	<ul style="list-style-type: none"> Is the information available and up to date in the California <i>DASHBOARD</i>? What practices are in place to support this type student concerns? 	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Comments:	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Comments:

Guiding Questions LEA	Acceptable LEA Evidence Documentation	Probing Questions Interview	LEA Response	Is sufficient documentation provided?
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Guiding Questions LEA	Acceptable LEA Evidence Documentation	Probing Questions Interview	LEA Response	Is sufficient documentation provided?
<p>2.1a How and from what sources does the LEA collect information to determine the ongoing needs of homeless students in the LEA?</p>	<ul style="list-style-type: none"> Data and summary reports from other program offices in the LEA and other community agencies concerning the educational needs of homeless children and youth in the LEA. 	<ul style="list-style-type: none"> How does the LEA coordinate programs and services between the LEA and other agencies to assist in the identification, enrollment, and retention of homeless students? 	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Comments:</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Comments:</p>
<p>2.1b How does the LEA ensure coordination among LEA programs and community agencies serving students experiencing homelessness, including Title I, Part A, Title III, special education, early learning services, and at-risk youth programs?</p>	<ul style="list-style-type: none"> Evidence that the LEA ensures that homeless students receive Title I, Part A, services through sections of the consolidated application and schoolwide program plans addressing the educational needs of homeless students, and description of the activities funded through the LEA reservation for comparable services for homeless students in non-Title I schools. 	<ul style="list-style-type: none"> How does the LEA provide comparable services for homeless students attending Title I and non-Title I schools? How does the LEA determine its Title I, Part A, reservation for students experiencing homelessness and how are the funds used? How do homeless children and youth receive free meals through the National School Lunch Program? How do homeless families, children, and youth receive referrals to health care services, dental services, mental health services, and other appropriate services? 	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Comments:</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Comments:</p>

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	<ul style="list-style-type: none">• Evidence that the LEA coordinates programs and services between the SEA, LEA, and other community agencies (including agencies providing mental health services), for example schedules, agendas, minutes, notes or handouts from attending such meetings.			
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Guiding Questions LEA	Acceptable LEA Evidence Documentation	Probing Questions Interview	LEA Response	Is sufficient documentation provided?
<p>2.2a How often does the LEA monitor changes in staffing of LEA liaisons? How does the LEA liaison learn about liaison responsibilities under McKinney-Vento?</p>	<ul style="list-style-type: none"> Evidence that the LEA designates and allows for training of a liaison for homeless children and youth and that this person provides training to other relevant LEA personnel. Staff directory of LEA Website that identifies the liaison. 	<ul style="list-style-type: none"> How is an appropriate staff person designated as the LEA liaison for homeless children and youth to carry out the duties described in Title X, Part C, Section §722 (g)(1)(J)(ii)? How is the state coordinator notified of any changes in personnel? In what professional development activities has the liaison participated related to McKinney-Vento responsibilities? 	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Comments:</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Comments:</p>
<p>2.2b What special activities are undertaken on behalf of homeless preschool children and homeless unaccompanied or out-of-school youth?</p>	<ul style="list-style-type: none"> How does the liaison coordinate with preschool programs and programs for unaccompanied youth, including community agencies? Sample letters and/or meeting agendas. On-time graduation rate disaggregated by homeless status. 	<ul style="list-style-type: none"> Do preschool-aged homeless children receive educational services for which they are eligible, including access to Head Start and preschool programs administered by the LEA? Does the LEA homeless liaison assist unaccompanied youth with school placement decisions? 	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Comments:</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Comments:</p>
<p>2.2c How does the LEA ensure enrollment in the school of origin, if</p>	<ul style="list-style-type: none"> Evidence that the LEA 	<ul style="list-style-type: none"> Are the parents or guardians of homeless children and youth 	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Comments:</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Comments:</p>

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<p>feasible and in the best interest of the child, and transportation, when requested?</p>	<p>ensures that transportation to the school of origin is provided upon request and monitored by the LEA.</p> <ul style="list-style-type: none"> • Transportation referral forms • Feasibility/best interest determination forms. 	<p>informed of the educational opportunities available to their children and provided meaningful opportunities to participate in the education of their children, including school of origin and transportation options?</p> <ul style="list-style-type: none"> • How does the LEA conduct best interest determinations for placement decisions? • How is transportation provided, at the request of the parent or guardian (or in the case of an unaccompanied youth, the LEA homeless liaison), to and from the school of origin? 		
<p>2.2d How does the LEA ensure that community agencies that serve homeless individuals are made aware of the rights of homeless</p>	<ul style="list-style-type: none"> • Evidence that the LEA liaison or LEA staff conducts outreach to relevant LEA staff and community groups to inform them of McKinney-Vento rights and services for homeless children and youth, such as copies of agenda, minutes, handouts or notes. 	<ul style="list-style-type: none"> • How do school personnel, service providers, and advocates working with homeless families receive appropriate information and technical assistance on the educational rights and needs of homeless students? • Is public notice of the educational rights of homeless children and youths disseminated where such children and youths receive services under the McKinney-Vento Act, such as schools, family shelters, and soup kitchens? 	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Comments:</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Comments:</p>

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		<ul style="list-style-type: none"> • Where else are the rights of homeless students posted? • What other activities are conducted to raise awareness of McKinney-Vento rights? 		
<p>2.2e How does the LEA ensure that homeless students are enrolled and assisted with basic school requirements (e.g., records transfer, health and immunization records, and residency)?</p>	<ul style="list-style-type: none"> • Evidence that the LEA annually reviews and revises policies and practices to ensure they do not act as barriers to enrolling homeless students, such as agenda, minutes or notes from meeting where these reviews occur. 	<ul style="list-style-type: none"> • How does the LEA review and revise policies and practices (such as those regarding immunization and health records, residency requirements, birth certificates, school records, and guardianship) to ensure they do not act as barriers when enrolling homeless students? §722 (g)(7) • What data (achievement data, barrier logs, technical assistance logs, etc.) are used to inform practices? • What processes are in place to address barriers and other challenges identified? • How does the LEA document that students experiencing homelessness are immediately enrolled in school and provided assistance in obtaining any missing enrollment documents? 	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Comments:</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Comments:</p>

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		<ul style="list-style-type: none">• Are school records made available in a timely manner when a student transfers out of the school division?		
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