

State Coordinators' Handbook

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Section D. Tips on preparing for federal monitoring review of the McKinney-Vento Education for Homeless Children and Youth Program

D.1 Introduction

States can prepare for their next Federal monitoring review of the McKinney-Vento Education for Homeless Children and Youth Program by understanding the monitoring process and the issues that states typically face during a Federal monitoring review. Although preparing for the review may seem overwhelming, especially for new EHCY Coordinators, the larger purpose of the monitoring process is important to keep in mind.

- **Meeting compliance requirements for the EHCY program is important.** The monitoring indicators represent the major Federal compliance requirements of the EHCY program. Most are based on statutory requirements and some pertain to the U.S. Department of Education’s General Administrative Regulations (EDGAR) and Cost Circulars issued by the U. S. Office of Management and Budget (OMB). If SEAs have the required policies and procedures in place, then children who are experiencing homelessness have a higher likelihood of receiving a free and appropriate public education, including preschool, and support services. The complete list of monitoring indicators can be found in Appendix D.1 Monitoring Indicators for McKinney-Vento Homeless Education Standards, Assessment and Accountability.
- **Meeting compliance requirements for the EHCY program is possible.** In addition to benefitting students, if SEAs have the correct policies and procedures in place, then the Federal monitoring review should go smoothly. Based on the five-year examination of EHCY reviews, most states were already compliant with nearly all monitoring indicators, and most SEAs that received findings during their first review were able to resolve them and not have recurring findings in the following reviews. Appendix D-2. Summary of Title X, Part C (McKinney-Vento) Program Monitoring Results (FY 2003 to FY 2008) is an analysis of the findings and recommendations ED made to SEAs through two cycles of EHCY program monitoring in Federal Fiscal Years (FFY) 2003-5 and FFY 2006-8 in order to inform them of the most common compliance concerns.

With this in mind, this guide provides practical tips on how McKinney-Vento Coordinators (and their teams) can approach the review process efficiently and effectively and meet the compliance requirements for the EHCY program. In addition, these tips may identify ways to improve the administration of the EHCY program, even if a review is not in the immediate future. While the primary responsibility to prepare for the review rests with the State Coordinator, the SEA is ultimately accountable for the administration of the program and this document can be useful for other SEA staff with duties for administering the McKinney-Vento program.

The first set of tips is broken down by activities to complete before the review, during the review, and after the review. The second set provides detailed tips for meeting the requirements of all of the current McKinney-Vento monitoring indicators—including background information to review, ways to assess your compliance, and how to address areas in which you might not be in compliance.

Start to Finish: Tips for Participating in a Federal Monitoring Review

D.2 Pre-Review

D.2.1 Pre-Contact with SASA

Tools Related to State-Level Coordination and Collaboration

Online NCHE Documents

- [Collaborations of Schools and Social Service Agencies](#)
- [Housing Agency and School District Collaborations to Serve Homeless and Highly Mobile Students](#)
- [Increasing School Stability: Overcoming Challenges to Providing Transportation to the School of Origin](#)
- [Navigating the Intersections of IDEA and McKinney-Vento: A Problem-Solving Process](#)
- [When Working Together Works: Academic Success for Children in Out-of-Home Care?](#)

Online NCHE Video and Webinars

- [Homeless Education and Title I: Collaboration and Compliance](#)
- [Recruiting your Team: Building Collaboration to Serve Homeless Students](#)

Consult your EHCY community for ideas, guidance, and support. Check the [NCHE Website](#) regularly for additional products related to coordination and collaboration.

States often think that the pre-review process begins with a call from the Student Achievement and School Accountability (SASA) programs monitoring team leader regarding the upcoming review. To put your best foot forward, think ahead, even before getting that call. By starting earlier, you will have time to understand the current monitoring indicators, assess your state's compliance with those indicators, and adjust policies and practices as necessary. Even if a review is not scheduled, you should become familiar with the current EHCY monitoring indicators and have a process in place to periodically organize and review documents. The following list identifies steps that you and your team can take in advance.

- Familiarize yourself with each monitoring indicator (see respective *Background Information* by indicator on pages 21–30).
- Check when your state was last reviewed to determine the possibility of being reviewed during the next year.
- Most states are monitored once every three years, but since October 2009, some SEAs have been reviewed every year or two, while others have not been reviewed for four or five years.
- Review your last Federal monitoring report and any corrective action materials and identify any findings that your SEA received during the last review. For a copy of your last monitoring report, go to <http://www.ed.gov/admins/lead/account/monitoring/index.html> or contact the Federal program officer. For a copy of the required written response to any corrective action sent to ED after your SEA received the monitoring report, contact your Title I Director.
- Identify your program's team at each level, including other SEA staff with duties administering the EHCY program and the local liaisons who will be interviewed by the ED team. Include people who are knowledgeable about each indicator and can speak to the requirements, for example, *EDFacts* or CSPR Coordinators at the SEA or fiscal or monitoring staff. Let them know when the monitoring visit will take place and what their responsibilities are for preparation and during the interviews.
- Locate the materials which SASA will usually request at least two months in advance of your

review, including:

- A copy of your SEA’s McKinney-Vento EHCY State Plan
 - Copies of documents related to the process that you use to competitively award LEA subgrants, including a list of all current LEA subgrantees and award amounts
 - Copies of any updated guidance and technical assistance materials that you have provided to subgrantees since your last review
 - Copies of currently approved subgrant applications for the LEAs selected for interviews, including budgets
 - Materials from monitoring activities, guides, or practices (e.g., copies of recent monitoring activities, schedule of upcoming visits, and follow-up to any corrective action required)
 - Any program evaluation reports for LEAs that you anticipate being interviewed (e.g., reports submitted to the SEA in addition to the CSPR, if available)
 - Any collaborative agreements or Memoranda of Understanding or Agreement, for example, with other programs or agencies.
- Assess your state’s compliance with each indicator (see Indicator Tip Sheets on pages XX-XX for questions that you can ask yourself to assess the compliance of your program).
 - Address any areas of noncompliance by rectifying the issues or planning how they will be rectified.

D.2.2 Contact with SASA

In preparation for your review, SASA and your SEA will communicate a number of times. In general, SASA will inform Title I Directors about which states are slated for a review during the summer before each Federal fiscal year, which begins on October 1. Approximately two to six months before the visit, a SASA monitoring team leader will contact your Title I Director again to begin making more detailed plans. After the SASA monitoring team leader contacts the Title I Director, the EHCY Federal Coordinator will contact the State Coordinator for Homeless Education to finalize the selection of subgrantees for review and discuss the schedule for the

week of the review. This communication is usually followed up by a memorandum that is e-mailed to you, your Title I Director, and the monitoring team leader at SASA. After this notification, you will coordinate the logistics of the review with the Federal program office, including the developing the schedule for LEA interviews and preparing the requested documents for the review; and submit the required materials to staff in the SEA who will send them to the SASA monitoring team leader. If the EHCY Federal Coordinator is not scheduled to conduct your review, then other ED staff may also contact you for additional details, as needed.

The following tips describe things that you can do to facilitate the early stages of communication with SASA.

- Assist the EHCY Federal Coordinator with the selection of the LEA subgrantees that will be interviewed, if appropriate. The Federal Coordinator may have specific requests for selection related to the following areas:
 - Whether an LEA also receives a Title I, Part D, subgrant
 - The relative size of the LEA award
 - The number of students served by the subgrant
 - District or school programs that have experienced problems

Coordination with the selection of the Title I, Part A LEA, logistics, and travel time are also considered when identifying locations to visit if doing an onsite review. Due to time limitations, monitors are not often able to travel more than a few hours from the SEA office.

- Finish preparing ED-requested materials and send them via e-mail to the EHCY Federal Coordinator. For all paper files, scan and then e-mail the scanned files. Or, have the SEA set up a designated server, which ED has access to, and upload the requested materials. Alternatively, paper files can be delivered via express mail and you can include links to any materials that are available digitally via the Internet.
- Identify your program's team at each level (SEA and LEA) if you have not done so already. Include people who are knowledgeable about each indicator and can speak to the

requirements.

- Arrange and coordinate the monitoring schedule with the EHCY Federal monitor and appropriate SEA and subgrantee representatives.

Typical Schedule* for the EHCY Portion of the Onsite SASA Program Review

- Three- to Four- Day Monitoring Visit
 - **Tuesday:** LEA interview #1 conducted.
 - **Wednesday:** LEA interview #2 conducted.
 - **Thursday:** SEA interview conducted.
 - **Friday:** Exit conference is held in the morning, if it was not held on Thursday afternoon.

Scheduling Considerations for Interviews

The McKinney-Vento review can be a group interview with two or more subgrantee homeless liaisons and/or 1 or more non-subgrantee homeless liaisons.

If an LEA would like to include a variety of program representatives who can speak to your program's compliance with McKinney-Vento requirements, then schedule additional time.

The reviews usually do not involve site visits to homeless family or youth shelters located within the boundaries of the subgrantee LEAs selected, but that may be possible if schedules permit. *

Subject to change Meet in person or via phone with the team that will be involved in the review to educate them on the process, and describe the roles and responsibilities of each person. If you have not yet assessed the compliance of your program, then several meetings may be required to fully assess compliance and make necessary changes to programs and practices.

Note: It is not your role to coach the team on what to say or not to say. While you want the team to show the program's best side, an honest view of the program with its strengths and flaws will provide a foundation for program improvement.

- Contact the EHCY Federal Coordinator at any time to confirm the delivery of the requested materials, ask questions about the process, seek clarification, and so forth. If communicating by e-mail, include your Title I Director and the SASA monitoring team leader

in the e-mail. The EHCY Federal Coordinator is also likely to include them in any communications.

- Continue to assess your compliance with each indicator. (See Indicator Tip Sheets on pages 21–30 for questions that you can ask yourself to assess the compliance of your program.)
- Continue to address areas of noncompliance by rectifying the issue or planning how it will be rectified.

D.3 During the review

After following the previous tips, you should have a good idea of what to expect, who will be doing what, and the degree to which your program complies with each monitoring indicator. The next section includes tips on how best to manage the logistics of the onsite review, facilitate the EHCY Federal monitor’s review of documents, and participate in interviews.

Logistics

- Confirm whether the EHCY Federal monitor has appropriate logistical information. For remote reviews, the monitor should know with whom, when, and how to connect with the state and selected LEA subgrantees for each interview being held via video conference. For onsite reviews, the monitor should know where he/she is going, have appropriate directions, and know with whom and at what time he/she will be meeting. Providing a sheet with details can facilitate this process.
- Make sure appropriate meeting space and/or video conference equipment are ready and available for the SEA and LEA interviews. Test any required technology the morning of the interview to make sure that meetings happen efficiently and on time.
- Provide the EHCY Federal monitor with a list of names, phone numbers, and e-mail addresses for essential staff with whom he/she may need to speak while monitoring. Given the limited time for introductions, the ED team prefers to have the names of those attending the subgrantee interviews before the interview.

- For onsite reviews, provide the EHCY Federal monitor with a list of eateries in the area. The monitor must pay for his/her own meals, even if the SEA offers or provides food. However, SEA staff and subgrantees may join SASA monitors for a meal, if the schedule permits.

Documentation

- Organize documents by indicator. For example, a series of paper or electronic folders for each indicator should include ways to easily differentiate between documents.
- In addition to the initial document request, refer to SASA monitoring indicators in Appendix D.1 for lists of documents by indicator that you will have to prepare.
- Include only documents for the current fiscal year or most recent year for which you have information relevant to the respective indicators.
- If you want to share a few additional documents with the EHCY Federal monitor, then place them in a miscellaneous section behind the other documents or in a separate file.
- Include documents from the current fiscal year (FY). If you have not yet conducted some activities during the current FY (e.g., monitoring, application processes), then include documents from the previous FY.
- Identify appropriate staff to assemble the documents or files (e.g., a fiscal staff member to prepare the budget-related documentation).
- Provide copies of CSPR data only for subgrantees that will be interviewed. SASA will have a copy of the latest state report.
- Provide copies of other program evaluation reports—that include evaluation of the EHCY program—submitted to the SEA or conducted by the LEA.
- DO NOT share individual student records. However, you may show a sample page that summarizes individual data. Be sure to conceal personally identifiable information to maintain student confidentiality.

Interviews

- Review the questions included in the SASA monitoring plan of indicators for EHCY (See Appendix D.1).
- Invite only appropriate staff—such as administrators or supervisors of programs (decision-makers) or providers of direct service to students—who can answer the questions described in the SASA monitoring guide.
 - Including extra staff as attendees or respondents will make the interview longer; plan the schedule in accordance with the number of staff involved.
 - SEA staff are welcome to attend SASA interviews with subgrantees.
- Prepare yourself and appropriate staff to answer all questions that are outlined in the SASA guide.
- If you have created PowerPoint presentations as part of your technical assistance to subgrantees, ED recommends that you provide a single copy of all the slides in handout form (e.g., six slides per page, two-sided) or just the first few slides. In the interest of saving resources, please do not submit copies of every slide in color on a separate page.
- Identify documents which you will refer to during the interviews. Print outs of all e-mail communications with partners or subgrantees are NOT necessary. However, agendas from meetings attended by the subgrantee may be useful to have on hand.
- Attend the exit conference and take notes.
- Get the monitor’s input on the ways in which you can make improvements, particularly if he/she has identified preliminary issues and has agreed to share tips on how to remedy or address findings.

Exit conference

At the conclusion of the monitoring review, the SASA monitoring team will meet with your Title I Director and appropriate SEA representatives, per the Director’s invitation, to (a) discuss its *preliminary* assessment of the SEA’s compliance to Federal requirements, (b) consider how to rectify *preliminary* issues, and/or (c) describe the next steps of the process. This meeting is

designed to close the review and allows monitors to follow up with their respective State Coordinator. During this meeting, the SASA monitoring team will not give you a final assessment as to whether and in which areas you are and are not compliant. For offsite reviews, your monitor will participate via phone or video conference; you can also participate remotely from your SEA office.

D.4 Post-review

Report and findings

After the site visit or interviews have been completed (whether offsite or onsite), the SASA monitoring team will finalize a monitoring report. If SASA identifies any EHCY findings, they will be detailed in the report and you will be expected to rectify them. Before the monitoring report is finalized, however, a draft version will be sent to your Title I Director who will have five business days to review the draft and point out inaccuracies. Once the final version of the report is received, your Title I Director has 30 business days to respond to any findings and required actions. During this time, you will have to project a timeline for the completion of the required action(s). Related tips are below.

- Expect to receive your monitoring report from SASA about 40 days after the review is completed.
- If you do not receive a copy of ED's monitoring report after two months, then follow up with your Title I Director.
- DO NOT contact the EHCY Federal Coordinator or EHCY Federal monitor about the review before receiving your report unless he/she contacts you with follow-up questions.
- Use the information from your exit conference and monitoring report in your response to any findings and required actions.

Additional activities

Although the review is officially over, the work that you did for the review can be helpful in ensuring that all of the required program elements are implemented. Remember that the

review preparation presents a wonderful opportunity for your team to reflect on the work of your program. To conclude the review process, share and use the knowledge you obtained to improve your program and prepare for the next Federal monitoring review. Ultimately, the goal of this review is to help you deliver an EHCY program that serves homeless children and youth to the fullest extent possible. Debrief with your team of staff and subgrantees. What worked well? What did not? How can this experience inform your subgrantee monitoring processes? Revisit findings and monitoring indicators on a regular basis to minimize preparation for the next review and to ensure that your program maintains compliance over time. Document the process that you used for the review and archive related materials in an easily accessible location to facilitate preparations for the next review.

- Talk with your team members and with staff at the state level about how what you have learned during the process can make your EHCY program more effective.

D.5 Indicator by Indicator: Tips for examining your EHCY Program

To prepare for the content of the EHCY Federal monitoring review, the following section provides comprehensive tip sheets for each of the current EHCY monitoring indicators. Each tip sheet provides basic steps that you can take in preparation for your review, including detailed lists with the following:

- Background information that you can review to better understand the requirements (e.g., links to relevant sections of the statute, Nonregulatory Guidance, and so forth)
- Questions that your team can answer to assess program compliance
- Steps that you can take to address areas in which you are not compliant, including helpful tools to which you may refer to gain compliance

Because of the comprehensive nature of the tip sheets, your team of state and subgrantee staff may need several meetings to work through all of them (see pages 14–16 for general, related tips). For example, after an initial meeting to describe your upcoming monitoring review, you could arrange a couple of meetings for each indicator with appropriate staff (data and monitoring staff for current Indicator 1.1, budget staff for current Indicators 3.1

and 3.2). During those meetings, designated teams can work through their respective indicator tip sheet and then gather needed documents and prepare for SASA interviews.

D.6 Indicator 1.1 (Monitoring, evaluation and compliance)

- **Review background information on Indicator 1.1**

- SASA's criteria for McKinney-Vento Indicator 1.1 in Appendix D.1
- Relevant sections of statute: MVHAA, §722(g)(2)(A) and (B)
- Relevant sections in ED's *Nonregulatory Guidance*:
- NCHC's *State Coordinators' Handbook: Charting the Course*

- **Assess compliance with standards, assessment, and accountability requirements**

Monitoring

Tools

- Do you have subgrantee interview protocols and document checklists for your LEA subgrantees?
- Are your subgrantee monitoring protocols and checklists aligned with the federal McKinney-Vento statute and monitoring plan?
- Do your protocols and checklists allow you to determine whether LEA applications are complete, and being implemented fully?

Process

- Do you have a subgrantee monitoring schedule for all of your subgrantees? Do you notify all of your subgrantees about the monitoring schedule and upcoming reviews?
- Do you share monitoring plans with all subgrantees in advance of the review?
- Do you provide guidance or training to subgrantees on the monitoring process in advance of their review (e.g., explain the process and provide tips on how to prepare)?
- Do you prepare and send a monitoring report to each subgrantee after its review?

- Do you provide guidance and technical assistance to the subgrantees that have to prepare corrective action plans?
- Do you follow up on corrective action plans to subgrantees who are not compliant?

Accountability and evaluation

Data collection

- Did all of your LEAs submit homeless student enrollment and primary nighttime residence data during the last data collection? If any did not, why not?
- Have you established consequences for subgrantees that do not report data on enrolled and served students?
- Do you provide subgrantees with guidance and technical assistance on data collection and CSPR submission?
- In addition to the CSPR, do you require subgrantees to submit additional data for evaluation purposes (e.g. data on attendance or graduation rates?)

Data use

- Do your subgrantees have a copy of the most recent CSPR report or other program evaluation report?
- Do your subgrantees show evidence of longitudinal tracking and comparison of program performance for two or more years?
- Do you provide subgrantees with guidance and technical assistance on how to use data to evaluate the effectiveness of the program(s)?
- Have you taken any action with a subgrantee if one of its programs has not met its targets, improved its outcomes or is otherwise underperforming?
- Have you developed materials that describe statewide program performance, for example, as percentages or comparisons to national averages?
- Have you disseminated materials to your agency, subgrantees, collaborative partners, and/or the public that describe statewide program performance?

It is important that every LEA within a state be reviewed for its implementation of the requirements of the McKinney-Vento Act at least once every three-to-five years. The number of LEAs within a state varies widely as does the capacity of the Office of Coordinator. However, SASA does not require a site visit to every LEA and it permits desk reviews and remote reviews of LEAs that are at lower risk of compliance concerns. Furthermore, as for data collection and use, while all LEAs and SEAs must submit some data on homeless children and youth enrolled and served, not using the data for needs assessment or program evaluation is likely to lead to recommendation to do so in this area, unless other sources of data besides ED's CSPR are being used regularly.

Tools Related Monitoring, Evaluation, and Compliance

Monitoring

- [The State Coordinator's Handbook for LEA Monitoring](#)

Evaluation

- [NCHE's *Educating Homeless Children and Youth: Conducting Needs Assessments and Evaluating Services*](#)
- [Standards and Indicators for Quality McKinney-Vento Programs](#)

Consult your EHCY community for ideas, guidance, and support. Check the [NCHE Website](#) regularly for additional products related to standards, assessment, and accountability.

D.7 Indicator 2.1 (State level coordination and collaboration)

- **Review background information on Indicator 2.1**
 - SASA's criteria for McKinney-Vento Indicator 2.1 in Appendix D.1
 - Relevant sections of the statute: MVHAA, §722(f)(1), (4) and (5)
 - Relevant sections in ED's *Nonregulatory Guidance*: D and M
 - NCHE's *State Coordinators' Handbook: Charting the Course*: Section B
- **Assess state-wide information collection, policies, activities, and partnerships**

Needs assessment

- Do you collect information from multiple sources to determine the ongoing needs of homeless children and youth in the state?
- Do you receive data and summary reports from other program offices in the SEA concerning the needs of homeless preschool children and unaccompanied youth?
- Are LEAs asked about the enrollment and attendance problems that homeless students encounter?
- Do you check with other agencies or organizations to ensure that LEAs are meeting the needs of homeless children?

State policy

- Have you recently reviewed and revised policies, or issued policy briefs or memoranda to ensure removal of barriers for homeless students?
- Do you provide copies of policy changes to LEAs, and if so, do you actively seek their participation and feedback concerning new policy development?

State-wide coordination activities

- Do you participate in state interagency activities around homeless issues?
- What state-wide community outreach and collaboration activities are available for homeless families and youth?
- Do you have any documents related to formal partnerships or memberships on committees with which you have coordinated at the state level?
- Do you organize or participate in state-wide activities that address the needs of homeless preschoolers and unaccompanied youth?
- Do you include Runaway and Homeless Youth Programs in these activities?
- Does the State Coordinator collaborate with other SEA staff to address the needs of homeless children and youth?
- Do you participate in Statewide Intervention Coordinating Councils (IDEA, Part C),

Statewide Special Education Advisory Panels or Councils (IDEA, Part B), or Early Childhood Advisory Councils (authorized under the Head Start Act)?

- Do you participate in Statewide or Balance of State Continuum of Care (or state councils on homelessness)?
- Do you actively coordinate between SEA programs serving students experiencing homelessness including Title I, Part A, special education, early learning services, and at-risk youth programs?
- Do you coordinate regularly with the Title I, Part A program to address the educational needs of homeless students who participate in schoolwide programs, are not served by a targeted assistance programs, or are not enrolled in Title I schools but served by the LEA reservation for comparable services?

The expectations for coordination and collaboration with other programs and agencies are so broad in scope that it is not possible to conduct all of them equally. Priorities for collaboration will vary from state to state. If you look at the analysis of monitoring findings and recommendations in this area, you will notice that there are certain priority subpopulations of homeless children and youth and certain programs with which to prioritize coordination. These groups include homeless unaccompanied youth and preschool children, the two ends of the K-12 spectrum. The most important program for coordination is Title I, Part A, but coordination with special education, Head Start, HUD's regional Continuum of Care and other Federal, state and local programs serving at-risk children and youth should be robust in relation to state-specific needs and priorities.

If there has been no communication between the Office of the Coordinator and the Title I, Part A program office or any statewide agency or organization serving homeless unaccompanied youth or preschool children, there is likely to be a compliance finding. If there has been some communication, but evidence from the review points to insufficient coordination in these priority areas, there may be a recommendation that mentions specific collaborations or gathering and sharing of data to further the collaboration. SASA recognizes that the capacity to implement the program varies from state to state and recommendations

would be made in the context of the SEA's capacity. For those State Coordinators doing an outstanding job coordinating and collaborating with other programs and agencies, the EHCY Federal monitor will commend what was observed at the exit conference.

D.8 Indicator 2.2 (Technical assistance to LEAs)

- **Review background information on Indicator 2.2**
 - SASA's criteria for Indicator 2.2 in Appendix D.1
 - Relevant sections of the statute: MVHAA, §722(e) and (g)(3) (a)
 - Relevant sections in ED's [Nonregulatory Guidance](#)
 - NCHE's *State Coordinators' Handbook: Charting the Course: Section B*
- **Assess compliance with program support for LEAs**

LEA Liaison orientation and support

- Do you have a directory or contact list including all LEA liaisons?
- Do you update your LEA liaison directory regularly?
- Do you provide at least one training per year that is open to all liaisons in the state?
- Do you assist new liaisons in learning the basic responsibilities outlined in McKinney-Vento?
- Do you provide other professional development activities to both LEAs with and without subgrants concerning the requirements of McKinney-Vento?
- Do you provide liaison trainings through multiple media including online trainings, conference calls, site visits, and regional conferences?
- Do you facilitate the participation of homeless liaisons in any statewide, regional or local coordination activities?

LEA program implementation

- Do you disseminate training resources such as pamphlets, posters, guidebooks, and

other materials to LEAs?

- Do you provide technical assistance to LEAs concerning subgroups of homeless youth, including, preschoolers, unaccompanied youth, those with special needs under IDEA, and migrant students?
- Do you provide technical assistance to LEAs to ensure community agencies such as shelters, motels, runaway/unaccompanied youth programs, are made aware of the rights of homeless students?
- Do you follow up technical assistance requests with a review of LEAs' policies and procedures to ensure that LEAs are meeting their McKinney-Vento requirements?
- Do you track the students who are placed in their school of origin and are receiving transportation there?
- Do you evaluate your technical assistance and instructional support to determine its effectiveness?

Given the varying number of local homeless liaisons in every state as well as the SEA's capacity to provide technical assistance for them, SASA's primary expectation is that every SEA will maintain a directory of local liaisons and make it public at least once per year.

Furthermore, given the breadth and dynamism to implement EHCY requirements, the SEA should offer a statewide training available to local liaisons at least once per year. However, these expectations are the minimum. Depending

on the evidence presented during the review and the capacity of the SEA, SASA may recommend that more trainings, perhaps customized by topic or region, be made available annually through a variety of media (e.g., Webinars, tele- or video-conferences).

Tools Related to LEA Instructional Support Policies and/or Practices

- [Clarifying documents and briefs from NCHE](#)
- [NCHE's Toolkit for Local Homeless Education Liaisons](#)
- [The National Staff Development Council \(NSDC\)](#), a non-profit professional association committed to ensuring success for all students through staff development and school improvement.
- Homeless education websites from other states on the [NCHE website](#)

Consult your EHCY community for ideas, guidance, and support. Check the [NCHE Website](#) regularly for additional technical assistance products.

D.9 Indicator 3.1 (Subgrants—LEAs)

- **Review background information on Indicator 3.1**

- SASA’s criteria for Indicator 3.1 in Appendix D.1
- Relevant sections of statute: : Title VIII, §722(e)(1) and §723(a) – (d)
- Relevant sections in ED’s *Nonregulatory Guidance*: K and L
- NCHÉ’s *State Coordinators’ Handbook: Charting the Course*: Section F
- Relevant sections of EDGAR: Part 80, Subpart C (Post-Award Requirements)
- Relevant OMB Circulars: Circular A–87 (Cost Principles) and Circular A–133 (Audits)

- **Assess compliance with fiduciary requirements for LEA subgrant programs**

Application

- Do you conduct a subgrant competition open to all LEAs?
- Do you inform all LEAs of subgrant rules and requirements before the opening of the competition?
- Do you provide technical assistance on the potential use of funds for potential applicants?
- Does your application include a description of policies and procedures that the LEA will implement to ensure that its activities will not isolate or stigmatize homeless children and youth?
- Does your application include a section that explains how services will support, improve, or expand, but not replace regular academic programs?
- Does the application include an assessment of the educational and related needs of homeless children and youth served by the LEA?

Review

- Do you have a standardized procedure for identifying and training reviewers?
- Do you review grants for quality of application as well as local need, including the use of a rating sheet or scale?

- Do you provide LEAs with review ranking and selection criteria?
- Does the review ensure that funds will not be used for services that replace regular academic programs?

Award

- Do you provide applicants with information regarding how their application was reviewed, scored or ranked in a timely manner?
- Do you have a system in place that allows LEAs to draw down grant funds as needed throughout the grant term?
- Do you have an up-to-date list of LEA subgrantees and award amounts?
- For continuing subgrantees, are there gaps in service provision due delays in receiving grant awards?

Use of funds

- Are your subgrantees implementing activities as approved and budgeted in their LEA application?
- Do you check whether LEAs are using funds to supplement (and not supplant) the regular academic program?
- Do you review general fiscal reports from your subgrantees (e.g., monitor periodic financial reports, lists of staff, how funds are carried over if appropriate)?
- Do you oversee other LEA financial activities (e.g., budget amendment requests and approvals)?
- For multiyear grants, have you provided information about the use of carryover funds to continue the program at the start of the next fiscal year?

Many of the questions asked about this indicator concern the SEA's operation of a competitive subgrant process and oversight of subgrant expenditures. There is less focus on the actual expenditures by subgrantees although the EHCY Federal monitor may ask about those

listed in the approved budget during an interview. It is rare that an LEA subgrantee is found to misuse EHCY subgrant funds; however, all expenditures must be attributable to an authorized activity in Section 723 (d) and be used to serve identified homeless students, with few exceptions (see L-3 in the EHCY Non-Regulatory Guidance). Beyond some scrutinizing of the budget, the EHCY Federal monitor will want to hear the LEA articulate how the program or project budget addresses the needs identified in the subgrant application, how it is being spent on identified needs, and how the LEA is evaluating the outcomes of those activities on homeless children and youth in the district. Having a process of continuous improvement in place for continuing subgrantees is important.

Tools to Adjust LEA Fiduciary Policies and/or Practices

- Subgrant RFPs from various states on the [NCHE state and local resources page](#)
- [Rubric for the North Carolina Homeless Education Program](#) on the NCHC state and local resources page
- NCHC's [Standards and Indicators for Quality McKinney-Vento Programs](#)
- [Educating Homeless Children and Youth: Conducting Needs Assessments and Evaluating Services - A Guide for SEAs, LEAs, and Local Schools](#)

Consult your EHCY community for ideas, guidance, and support. Check the [NCHE Website](#) regularly for additional products related to effective and innovative subgrant programs.

D.10 Indicator 3.2 (Reservations—SEA)

- **Review background information on Indicator 3.2**
 - SASA's criteria for Indicator 3.2 in Appendix D.1
 - Relevant sections of statute: MVHAA, §722 (c) – (g)
 - Relevant sections in ED's *Nonregulatory Guidance*: [C](#) and [D](#)
 - NCHC's *State Coordinators' Handbook: Charting the Course*: All but especially [Section G](#)
 - Relevant sections of [EDGAR: Part 80, Subpart C](#)
 - Relevant OMB Circulars: [Circular A-87](#)
- **Assess compliance with reservation requirements for state-level coordination activities**

General

- Do you allocate no more than 25 percent of your total federal grant for state-level activities, including the Full-Time Equivalent (FTE) of the State Coordinator salary?
- If you are a minimally funded state, do you allocate no more than 50 percent of your total federal grant for state-level activities, including the FTE of the State Coordinator salary?

Use of funds

- Do you maintain a detailed budget for all state-level activities and both direct and indirect administration costs?
- Do you have sufficient internal fiscal controls in place to account for the use of McKinney-Vento funds for state-level activities in a way that meets Federal requirements?
- Do you conduct comprehensive needs assessments of the educational needs of homeless children and youth in the state?
- Do you have a written policy and procedure for evaluating the effectiveness of state-level coordination activities?
- Can you provide documentation that shows the amount of state-level funds that were used for specific state-level activities?
- Can you provide documentation concerning the use of funds for state-level activities for the previous fiscal year?
- Can you list all staff, including the State coordinator, who are paid with McKinney-Vento

Tools to Adjust LEA Fiduciary Policies and/or Practices

- [Educating Homeless Children and Youth: Conducting Needs Assessments and Evaluating Services - A Guide for SEAs, LEAs, and Local Schools](#)
- [Education Department General Administrative Regulations \(EDGAR\), 34 CFR Part 80 \(Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments\)](#)
- [OMB Cost Circular A-87, Cost Principles for State, Local and Indian Tribal Governments \(relocated to 2 CFR, Part 225\)](#)

Consult your EHCY State Coordinator peers and SEA colleagues for ideas, guidance, and support. Check with NCHE or the Federal Coordinator about use of funds questions that are unclear to you.

funds and the FTE of their salaries, benefits, and duties that are funded by McKinney-Vento?

- Do you have a written policy regarding carryover funds at the state-level?

The main point of this indicator is to ascertain how much the SEA reserves from its EHCY allocation for state-level coordination activities and whether it can account for these expenditures. There is a dynamic tension between funding more direct services for homeless children and youth where the need is highest, evaluating the impact of those services and subgrant programs, and determining whether stronger state-level coordination might be more effective in leveraging mainstream services for homeless students. This is a new indicator since 2009 and it has yielded some interesting variations and issues across states. Besides checking on the maximum 25% reservation for most SEAs (50% for minimally-funded states), if an SEA has written information, such as an updated State Plan or statewide needs assessment, or policies that can explain a particular practice or expenditure, it will be better prepared to respond to the EHCY Federal monitor's questions.

D.11 Indicator 3.3 (Dispute resolution)

- **Review background information on Indicator 3.3**
 - SASA's criteria for Indicator 3.3 in Appendix D.1
 - Relevant sections of statute: MVHAA, §722 (g)(C)
 - Relevant sections in ED's *Non-regulatory Guidance*: G and H, and Appendices E and F
- **Assess compliance with the dispute resolution requirement**

General

- Do you have a written and standardized dispute resolution policy?
- Does your dispute resolution policy contain language specific to homeless children and youth?
- Are all liaisons aware of the state's dispute resolution policy?
- Have all LEAs adopted or adapted the state's dispute resolution policy?

- Do you have a reporting requirement for LEAs using the dispute resolution procedures?
- Do you have a process for reviewing disputes initiated by parents and youth?
- Do you keep track of the LEA’s decisions regarding enrollment disputes?
- Do you maintain a technical assistance log that tracks requests, recommendations, services delivered and outcomes?
- Do you provide technical assistance to LEAs on removing barriers to enrollment, providing transportation to school of origin, or coordinating with other homeless provider organizations?
- Does state policy allow you to make a final ruling on disputes that are not resolved at the LEA level?
- Does the SEA conduct any surveys to determine if parent/youth are receiving their rights regarding school enrollment and enrollment disputes?

It is rare for formal enrollment disputes to go from the LEA level to the SEA level in any given year. Therefore, the EHCY Federal monitor will be interested to know that written dispute resolution policies are in place at all the LEAs being interviewed. He or she will also be asked about complaints or inquiries that were resolved before going through a formal dispute process and how the LEAs and SEA have been tracking them. Finally, interviewees will be asked how that information is being used to inform state and local program plans, technical assistance and district or community outreach.

Tools to Adjust LEA Fiduciary Policies and/or Practices

- [Sample State dispute resolution process](#)
- [Sample State dispute resolution policies](#)

Consult your McKinney-Vento community for ideas, guidance, and support. Check the [NCHE Website](#) regularly for additional products related to [dispute resolution process](#).

Appendix D-1. Monitoring Indicators for McKinney-Vento Homeless Education Program Standards, Assessment and Accountability

1.1: The SEA conducts monitoring and evaluation of LEAs with and without subgrants, sufficient to ensure compliance with McKinney-Vento program requirements. [§722(g)(2)(A) and (B)]		
Guiding Questions	Acceptable SEA Evidence	Acceptable LEA Evidence
<p><u>Questions:</u></p> <ul style="list-style-type: none"> ▪ How does the SEA inform LEAs with and without subgrants about data collection responsibilities, and ensure complete, accurate and timely reports? ▪ How does the LEA collect local data and transmit information requested on homeless students to the SEA? ▪ How do the SEA and LEAs ensure that homeless students are included in statewide assessments? ▪ What emphasis do SEA and LEA place on student academic outcomes as part of the subgrant application? ▪ Does the SEA provide technical assistance and require LEAs with subgrants to conduct a program evaluation to determine the effectiveness of the program? ▪ What information has the LEA received 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> ▪ Written guidance for data collection requirements for LEAs and how the SEA reviews the data. ▪ Written procedures for monitoring LEAs with and without subgrants to include: <ul style="list-style-type: none"> ▪ Recent copy of monitoring policies and procedures, schedules for current and previous school years. ▪ Sample notification letters to LEAs, preparation checklists, or other forms. ▪ A copy of the interview protocol for LEA reviews. ▪ Most recent copies of reports, recommendations and follow-up to corrective actions. 	<p><u>Documentation:</u></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. ▪ Most recent reports of statewide assessment performance of homeless students enrolled in the district for the last fiscal or school year.

<p>from the SEA about its monitoring requirements for the McKinney-Vento program?</p>		
<p>2.1: The SEA implements procedures to address the identification, enrollment and retention of homeless students through coordinating and collaborating with other program offices and State agencies. [Title X, §722 (f) and (g)]</p>		
<p>Guiding Questions</p>	<p>Acceptable SEA Evidence</p>	<p>Acceptable LEA Evidence</p>
<p><u>Questions:</u></p> <ul style="list-style-type: none"> ▪ How and from what sources does the State collect information to determine the ongoing needs of homeless students in the State? ▪ Since the State submitted its 2002 application, has it reviewed, revised, and developed policies, or issued policy briefs or memoranda to ensure removal of barriers for homeless students? ▪ How does the State coordinator collaborate with other State agency staff to address the needs of homeless children and youth? ▪ How do the SEA and State coordinators ensure coordination among SEA programs serving students experiencing homelessness, including Title I, Part A, Title III, special 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> ▪ Written communication to LEAs updating SEA policies and procedures that address the problems homeless children and youth face in school enrollment and retention since the last ED program review. ▪ Updates to the State Plan, including the completion of planned activities and proposals for new State-level activities. ▪ Data and summary reports from other program offices in the SEA and other State agencies concerning the educational needs of homeless children and youth in the State. ▪ Evidence that the SEA coordinates programs and services between the SEA, the State social services agency, and other agencies (including agencies 	<p>N/A</p>

<p>education, early learning services, and at-risk youth programs?</p> <ul style="list-style-type: none"> How does the State coordinator participate in Statewide activities that address the needs of homeless pre-school children and unaccompanied youth? 	<p>providing mental health services), for example schedules, agendas, minutes, notes or handouts from attending such meetings.</p> <ul style="list-style-type: none"> Evidence that the SEA ensures that eligible homeless students receive Title I, Part A services through its written guidance to LEAs, 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. 	
<p>2.2: The SEA provides, or provides for, technical assistance to LEAs to ensure appropriate implementation of the statute. [§722(e) and (g)(3)(a)]</p>		
Guiding Questions	Acceptable SEA Evidence	Acceptable LEA Evidence
<p><u>Questions:</u></p> <ul style="list-style-type: none"> What ongoing professional development activities does the State coordinator provide to LEAs with and without subgrants about the requirements of McKinney-Vento? How often does the SEA monitor changes in staffing of LEA liaisons? 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> Copies of written guidance to LEAs and/or information dissemination materials distributed electronically or by other means. The most recent liaison orientation, on-line trainings, conferences, and regional training agendas and 	<p><u>Documentation:</u></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.

<p>How does the SEA assist new liaisons with learning their responsibilities for implementing McKinney-Vento?</p> <ul style="list-style-type: none"> ▪ What special activities are undertaken on behalf of homeless preschool children and homeless unaccompanied or out-of-school youth? ▪ How do the SEA and LEAs ensure enrollment in the school of origin, if feasible and in the best interest of the child, and transportation, when requested? ▪ What is the technical assistance that the State provides to LEAs to ensure that community agencies that serve homeless individuals are made aware of the rights of homeless students? ▪ How do the SEA and LEA ensure that homeless students are enrolled and assisted with basic school requirements (e.g., records transfer, health and immunization records, and residency)? 	<p>technical assistance log.</p> <ul style="list-style-type: none"> ▪ The most recent professional development schedules and agenda, handouts or other sample materials unique to the State. ▪ Documents related to activities associated with homeless preschool children, unaccompanied and out-of-school youth. 	<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 district personnel. ▪ Examples of written notification to parents and youth regarding placement decisions when they are different from what was requested. ▪ Evidence that the LEA ensures that transportation to the school of origin is provided upon request and monitored by the LEA. ▪ Evidence that the LEA liaison or district staff conducts outreach to relevant 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.
<p>3.1 The SEA ensures that Local Education Agency (LEA) subgrant plans for services to eligible homeless students meet all requirements. [§722(e)(1) and §723]</p>		

Guiding Questions	Acceptable SEA Evidence	Acceptable LEA Evidence
<p><u>Questions:</u></p> <ul style="list-style-type: none"> ▪ What are the steps the State takes to organize a subgrant competition? How are reviewers chosen and trained? ▪ How does the SEA review grants for quality of application as well as local need? ▪ How does the SEA ensure subgrant funds (including regular McKinney-Vento and ARRA funds) are awarded in a timely manner and available throughout the grant period? ▪ What is the SEA’s policy regarding carryover and reallocation of funds? ▪ What kind of internal fiscal controls do SEAs and LEAs have in place to account for the use of subgrant funds in a way that meets Federal requirements? 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> ▪ Evidence the SEA has an application and approval process to provide competitive subgrants to LEAs. ▪ Evidence that LEA subgrant applications are reviewed and awarded on a competitive basis for both need <u>and</u> quality of the project proposal. ▪ If the SEA awards any of its State-level coordination activity budget to LEAs for pilot projects, detail of those expenditures for the current fiscal year and any use of funds for the last fiscal year. ▪ Any other fiscal reporting or oversight of EHCY; for example, quarterly reports, budget amendment requests and approvals, etc. 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> ▪ Evidence the LEA application/plan includes assessment of the needs of homeless students and the supplemental services provided. ▪ Evidence that the subgrant expands or improves services provided as part of regular academic program. ▪ Written contracts when an LEA subcontracts any of its EHCY activities to a third-party organization. ▪ Evidence that the LEA is implementing required and authorized activities; for example, budget reports at the end of a fiscal year, records of expenditures, carryover and other summary reports. ▪ A current list of all personnel (instructional and administrative staff) paid with McKinney-Vento subgrant funds.
<p>3.2: The SEA complies with the statutory and other regulatory requirements governing the reservation of funds for State-level coordination activities. [§722 (c) – (g)] [Also OMB Circular A-87 and any other relevant standards, circulars, or legislative mandates]</p>		

Guiding Questions	Acceptable SEA Evidence	Acceptable LEA Evidence
<p><u>Questions:</u></p> <ul style="list-style-type: none"> ▪ How much of the McKinney-Vento EHCY allocation does the SEA reserve for State-level coordination activities and what are those activities? ▪ What is the SEA’s policy regarding carryover of these funds? ▪ What kind of internal fiscal controls does the SEA have in place to ensure that it can account for the use of the regular McKinney-Vento and ARRA funds for State-level activities in a way that meets Federal requirements? ▪ What kinds of Statewide needs assessment and program evaluation is funded through State-level activities or conducted by the State coordinator? 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> ▪ SEA budget detail on reserved funds for State-level coordination activities for the current fiscal year and use of funds for the last fiscal year. ▪ Any other fiscal documents, such as contracts, invoices, etc. ▪ Needs assessment or evaluation reports for State-level coordination activities. 	<p style="text-align: center;">N/A</p>
<p>3.3: The SEA has a system for ensuring the prompt resolution of disputes. [§722(g)(C)]</p>		
Guiding Questions	Acceptable SEA Evidence	Acceptable LEA Evidence
<p><u>Questions:</u></p> <ul style="list-style-type: none"> ▪ How does the State Coordinator ensure that liaisons are aware of the 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> ▪ Updated SEA dispute resolution policy and procedures including: 	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> ▪ Written dispute resolution policy.

D-1-6

State Coordinators’ Handbook: Tips on preparing for federal monitoring review of the McKinney-Vento Education for Homeless Children and Youth Program
Appendix D-1. Monitoring Indicators for McKinney-Vento Homeless Education Program Standards, Assessment and Accountability

<p>State's dispute resolution policy and that the LEA has adopted or adapted the policy?</p> <ul style="list-style-type: none"> ▪ What is the State's process to review or investigate disputes brought by parents/youth? ▪ Do all districts have a written district dispute resolution process and track pre-dispute inquiries concerning barriers to enrollment? ▪ Do the SEA and LEAs conduct independent surveys of community groups to determine if parents/youth are receiving their rights regarding school enrollment and enrollment disputes? 	<ul style="list-style-type: none"> ➤ procedures for tracking disputes ➤ documents indicating that dispute procedures have been implemented ➤ records indicating that disputes are addressed, investigated and resolved in a timely manner <ul style="list-style-type: none"> ▪ Evidence that SEA tracks if LEAs have a dispute resolution policy in place. ▪ Survey results or records of inquiries and complaints made by community groups concerning barriers to enrollment for students experiencing homelessness. 	<ul style="list-style-type: none"> ▪ Evidence that LEA implements a process for the prompt resolution of disputes, such as a phone log, notes, or e-mail messages. ▪ Records indicating that enrollment disputes are investigated and resolved in a timely manner. ▪ Evidence that students are enrolled and provided transportation during the dispute resolution process. ▪ Survey results or records of inquiries and complaints made by community groups concerning barriers to enrollment for students experiencing homelessness.
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Appendix D-2. Summary of Title X, Part C (McKinney-Vento) Program Monitoring Results (FY 2003 to FY 2008)

Prepared by the National Center for Homeless Education

September 2010

Federal monitoring of Education for Homeless Children and Youth programs¹ by the United States Department of Education (ED) is intended to determine whether State educational agencies (SEAs) are providing adequate coordination and oversight of all local educational agencies (LEAs) in implementing the requirements of the McKinney-Vento Act. This Act requires states and school districts to review and revise laws, regulations, practices, or policies that may act as barriers to school enrollment, attendance, or success for homeless children and youth. It is a comprehensive review of state coordination rather than addressing compliance issues for individual LEAs or students.

The Education for Homeless Children and Youth (EHCY) program is administered by Student Achievement and School Accountability (SASA) programs of the Office of Elementary and Secondary Education. SASA monitoring indicators provide a standard against which implementation and oversight of program areas such as standards, assessment and accountability, program support and fiduciary responsibilities can be measured. The primary emphasis of SASA program monitoring is to ensure accountability for program requirements and judicious use of resources, but ED can utilize the data gathered through the monitoring process to design technical assistance initiatives and national leadership activities. Therefore, monitoring can serve the additional purpose of informing ED and its technical assistance providers to be better advisors to SEAs and LEAs. The purpose of this summary is to analyze the findings and recommendations ED made to SEAs through two cycles of EHCY program monitoring in Federal Fiscal Years (FFY) 2003-5 and FFY 2006-8 in order to inform them of the most common compliance concerns.

The origin of this summary report began with an analysis of the two cycles of SASA reviews in order to conduct a risk assessment of SEAs with multiple and recurring findings in SASA programs and to revise and reorganize program indicators, which happened for the cycle beginning in FFY 2009. Besides these changes, SASA began experimenting with conducting remote reviews by videoconferencing and providing on-site monitoring-related technical assistance to implement corrective action and program improvement plans. After providing an analysis of common findings and recommendations for the first two cycles of SASA monitoring under the No Child Left Behind Act, this report will conclude with a discussion of the current cycle of EHCY program monitoring.

¹ Title VII, Subtitle B of the McKinney-Vento Homeless Assistance Act, also referenced under Title X, Part C of the Elementary and Secondary Education Act

Starting in 2003-2004, SASA began utilizing a new framework to monitor its formula grant programs being administered by states and territories (hereafter referred to jointly as states). The design was created especially for the Title I, Part A program but also has included Title I, Part D, Title III, Even Start and EHCY programs. Indicators were designed to monitor the implementation of the program and the use of federal funds in three areas:

1. Standards, Assessments, and Accountability
2. Instructional Support
3. Fiduciary

Reviews involved a desk review of SEA and LEA subgrantee program-specific information and an on-site examination of the SEA along with a limited number of (LEAs) selected by ED. Table 1 describes the indicators for monitoring compliance utilized for state and local homeless education programs.

Table 1: Title X, Part C, Indicators for Monitoring Compliance

Monitoring Area	#	Description
Standards, Assessments, and Accountability	1.1	The SEA collects and reports to ED assessment data from LEAs on the educational needs of homeless children and youth.
Instructional Support	2.1	The SEA implements procedures to address the identification, enrollment and retention of homeless students through coordinating and collaborating with other program offices and State agencies.
	2.2	The SEA provides, or provides for, technical assistance to LEAs to ensure appropriate implementation of the statute.
Fiduciary	3.1	The SEA ensures that Local Education Agency (LEA) subgrant plans for services to eligible homeless students meet all requirements.
	3.2	The SEA ensures that the LEA complies with providing comparable Title I, Part A services to homeless students attending non-Title I schools.
	3.3	The SEA has a system for ensuring the prompt resolution of disputes.

Monitoring Area	#	Description
	3.4	The SEA conducts monitoring of LEAs with and without subgrants, sufficient to ensure compliance with McKinney-Vento program requirements.

SASA began utilizing the new framework in FY 2003-04 conducting two rounds of monitoring visits. The first round of EHCY visits were conducted from August 2004 - September 2006 and the second round was conducted between October 2006 and September 2009. EHCY programs in all states and territories, (50 states, Bureau of Indian Education, District of Columbia, and Puerto Rico hereafter collectively referred to as states) were reviewed at least once between FFY 2003 and FFY 2008. Fourteen SEAs were reviewed only once and 39 were reviewed twice.²

Table 2: Monitoring Schedule

First Round Dec 2003-Sept 2007*	Second Round Oct 2007- Sept 2009**
AL, AK, AZ, AR, CA, CO, CT , DE, FL, GA, HI, ID, IL, IN, IA , KS, KY, LA, ME , MD, MA , MI , MN, MS, MO , MT , NE , NV, NH, NJ , NM, NY, NC, ND, OH , OK, OR, PA, RI , SC, SD , TN, TX, UT, VT, VA, WA, WV, WI, WY, PR, BIE (52 total)	AL , AK, AZ, AR, CA , CO, DE, DC, FL, GA, HI, ID, IL, IN , KS, KY, LA, MD, MN , MS, NV , NM, NY, NC, ND, OK, OR, PA, SC, TN, TX, UT, VT, VA, WA , WV, WI, WY, PR, BIE (38 states)

*NOTE: * States in bold/red have been monitored only once. Even though the monitoring visit was in the second round, the results are listed in round one.*

***States in bold/blue were monitored twice during the first round, but results of second visit are reported as second round.*

Overview of Monitoring Findings and Recommendations

In the time period defined in this report (August 2004-September 2009), all states were monitored at least once. Fourteen were monitored only once, 39 have been monitored twice, and one has been monitored three times. Combining all monitoring results of all states shows:

- 124 findings
- 93 recommendations

² One state was reviewed three times (twice during the first round and once during the second round). Since there were neither findings nor recommendations in the first visit, that visit will not be included in this report.

One state received its first review during the second round of monitoring visits. For reporting purposes, results from that state will be included in the first round results. Additionally, five states had their second (and last) review during the first round. Those results will be included in the second round results.

- Ten states have never received a finding and seven of those have been monitored twice.
- Thirteen states have never received a recommendation and eight of those have been monitored twice.
- Three states have never had either a finding or a recommendation. Two of these have been monitored twice.

Shall we add an assessment/conclusion here that many States seems to be implementing McKinney-Vento requirements well and some States tend to have multiple or recurring findings or recommendations?

Table 3: Number of Findings and Recommendations by Review Round

First Round Monitoring Result	Number of Findings/ Recommendations	Number of States (of 53 Monitored) with at Least One Finding or Recommendation in First Round
Findings	93	40
Recommendations	65	35

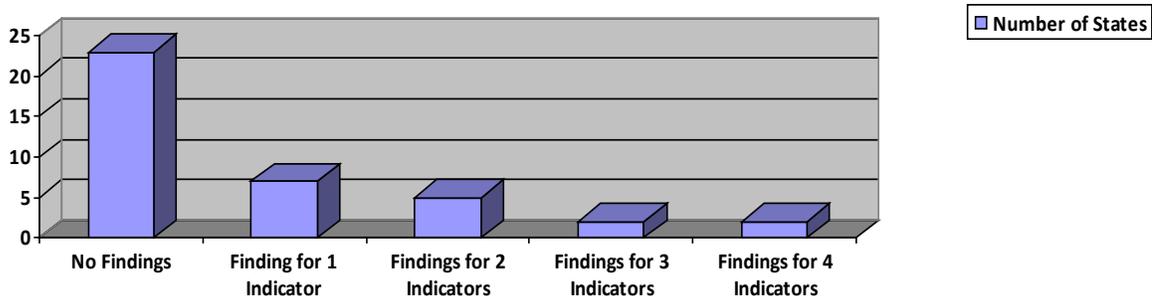
Second Round Monitoring Result	Number of Findings/ Recommendations	Number of States (of 39 monitored) With at Least One Finding or Recommendation in Second Round
Findings	31	15
Recommendations	29	18

Summary of Monitoring Findings

A finding is a compliance issue that has a required corrective action by the SEA with a written report to ED. During the first round of monitoring, 75% (40 of 53) of states received a finding, but during the second round only 38% (16 of 39) received one which is a decrease of 34%. Among states monitored twice, findings decreased from 69 to 31, a 55% drop. Ten states have never received a finding, and seven of those have been monitored at least twice.

Table 4: Number and Percent of Programs Receiving a Finding by Number of Indicators in Second Round (39 States)

States with No Findings		States with Findings for 1 Indicator		States with Findings for 2 Indicators		States with Findings for 3 Indicators		States with Findings for 4 Indicators	
#	%	#	%	#	%	#	%	#	%
23	59	7	18	5	13	2	5	2	5

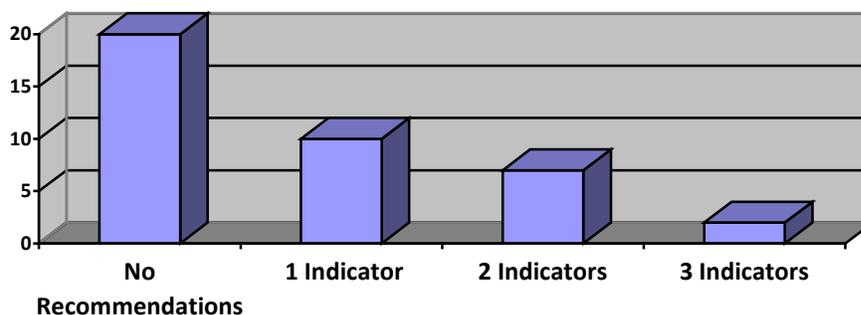


Summary of Monitoring Recommendations

A recommendation is related to program requirements or options and is made to improve SEA coordination of the program. There is no corrective action or written response required by the SEA to ED. Over the two rounds, there was an even greater decline in recommendations. During the first round, 66% of states (35 of 53) received recommendations, but that dropped to 46% (18 of 39) during the second round. Thirteen states have never received a recommendation. During the second round, 21 states received no recommendations, and only two received more than two recommendations.

Table 5: Number and Percent of States Receiving a Recommendation by Number of Indicators in Second Round

States with No Recommendations		States with Recommendations for 1 Indicator		States with Recommendations for 2 Indicators		States with Recommendations for 3 Indicators	
#	%	#	%	#	%	#	%
20	51	10	26	7	18	2	5



Most Commonly Cited Indicators

Of the 60 total findings and recommendations in the second round, 74% were related to three indicators:

- 37% Title I comparable services (3.2)
- 20% Monitoring of LEA programs (3.4)
- 17% Identification, enrollment (2.1)

The total number of findings and recommendations under each indicator varied from only one recommendation for 3.1 to 12 findings and 10 recommendations under 3.2.

Table 6: Number of States Receiving a Finding or Recommendation in the Second Round by Result and Indicator Number

	1.1	2.1	2.2	3.1	3.2	3.3	3.4
	#	#	#	#	#	#	#
Finding	4	3	2	3	12	0	7
Recommendation	2	7	2	2	10	1	5

Of 39 states, 16 had findings and 18 had recommendations under any indicator. Twenty three states had no findings and 20 had no recommendations. This includes 14 states with neither findings nor recommendations.

The next section of this report examines each indicator to provide more context for the findings and recommendations received.

Summaries by Indicator

The following is a summary of the findings and recommendations from the second round of monitoring. This summary encompasses only the second round since it reveals the most accurate picture of current program status.

STANDARDS, ASSESSMENTS, AND ACCOUNTABILITY INDICATORS

1.1 The SEA collects and reports to ED assessment data from LEAs on the educational needs of homeless children and youth.

4 Findings

- 1 state did not have a system for data collection.
- 1 state's LEAs did not report primary nighttime residence.
- 2 states did not include data from all LEAs; one was missing all data from particular regions and the other from all non-subgrant districts

2 Recommendations

- Conduct outreach efforts to LEAs with high Title I allocations that have identified zero homeless children and youth
- Enhance data collection process and provide technical assistance to ensure all LEAs submit data in timely manner

INSTRUCTIONAL SUPPORT INDICATORS

2.1 The SEA implements procedures to address the identification, enrollment and retention of homeless students through coordinating and collaborating with other program offices and state agencies.

3 Findings

- 1 state had not adequately staffed the State Coordinator position
- 1 LEA recognized during the monitoring visit that they have not identified eligible doubled up students

- 1 state had not determined whether residential facilities were homeless shelters or institutions for neglected and delinquent children and youth.

7 Recommendations

- Increase State Coordinator position to at least .5 FTE to provide more technical assistance
- Seek opportunities to be part of statewide coalition groups that focus on homeless children and youth
- All LEAs should have a written dispute resolution procedure
- Increase outreach efforts to districts
 - ❖ especially those without subgrants
 - ❖ consistently include awareness, enrollment, and retention topics in liaison training
- Collect periodic reports from LEAs about student transportation to school of origin including length of time and cost (2 states)
- Verify the accuracy of low numbers of students identified

2.2 *The SEA provides, or provides for, technical assistance to LEAs to ensure appropriate implementation of the statute.*

2 Findings

- 1 state paid 100% of the liaison's salary out of the Title I, Part A reservation
- 1 state lacked a comprehensive process to identify and enroll homeless students

2 Recommendations

- Customize TA for LEAs around identification and seeking additional resources to help implement McKinney-Vento programs
- Provide more focused TA to LEAs with and without subgrants

FIDUCIARY INDICATORS

3.1 *The SEA ensures that Local Education Agency (LEA) subgrant plans for services to eligible homeless students meet all requirements.*

3 Findings

- 2 states did not award subgrants in a timely manner
- 1 state allowed an LEA to use 100% of subgrant funds for transportation

2 Recommendations

- Prepare a written policy for fiscal oversight of subgrantees
- Have a carryover provision for use of subgrant funds

3.2 *The SEA ensures that the LEA complies with providing comparable Title I, Part A services to homeless students attending non-Title I schools.*

12 Findings

- 2 states allowed districts to pay 100% of liaison's salary with Title I, Part A funds
- 8 states had not ensured that all McKinney-Vento and Title I program coordination either to reserve appropriate reservation of Title I, Part A funds or to identify how the funds would be used
- 1 state did not ensure that homeless children attending non-Title I schools received comparable services
- 1 state allowed an LEA to use 100% of subgrant funds for transportation

10 Recommendations

- State Coordinator should provide more technical assistance/guidance concerning closer coordination of Title I and McKinney-Vento programs particularly focused on determining suitable reservation of Title I funds (7 states)
- Ensure reservation is based on methodical review of data (2 states)
- Obligate significant carryover from FY 2008 funds as soon as possible (1 state)

3.3 *The SEA has a system for ensuring the prompt resolution of disputes.*

0 Findings

1 Recommendation

- Ensure all LEAs have a written dispute resolution policy.

3.4 *The SEA conducts monitoring of LEAs with and without subgrants, sufficient to ensure compliance with McKinney-Vento program requirements.*

7 Findings

- 2 states did not ensure compliance of all LEAs.

- 2 states did not ensure compliance of LEAs with subgrants.
- 1 state did not ensure compliance of LEAs without subgrants.
- 2 states conducted monitoring only through Title I review process which was not extensive enough

5 Recommendations

- Require annual LEA program evaluation form regarding goals and targets. Include in grant application or submit with CSPR data (3 states).
- Increase subgrant monitoring from every five years to three years.
- Develop expanded monitoring for subgrants with protocol specific to McKinney-Vento indicators and review subgrants at least once during grant period.

Progress of States Monitored Twice Between 2003 and 2009

At the end of 2009, 39 states had been monitored at least twice. Comparing the last visit to the prior one, 85% of states received fewer or the same number of findings in Round 2. Eighty-two percent of states received fewer or the same amount or recommendations in Round 2.

Several states made dramatic improvements in receiving fewer findings and recommendations. Nine states reduced their findings by three or more including one state that dropped from seven to zero findings in the second round. Three states reduced their recommendations from five to zero and one dropped from three to zero.

Of the 29 second round recommendations, 11 were under indicators where the state received a finding in the first round but only received a recommendation in the second round.

Table 7 compares the findings and recommendations received in the first and second round of monitoring for states that had at least two monitoring reviews.

Table 7: Number and Percent of Twice-Monitored States by Result and Quantity of Results Compared with Previous Review

Monitoring Result	Fewer Results		Same Number of Results*		More Results	
	# of States	% of States	# of States	% of States	# of States	% of States
Findings N=32*	23	72	3	12	6	16
Recommendations N=31	16	52	6	19	9	29

*Seven states that have never received a finding and eight states that have never received a recommendation were omitted from the “Same Number of Results” column.

Summary of Monitoring Findings and Recommendations over Time

Indicator 1.1 was added during Round 2 so there were increases in the second round findings and recommendations. All other indicators had fewer overall findings in the second round, ranging from one to 16 fewer per indicator with an average decrease of 72% per indicator.

Of the 29 recommendations in the second round, only seven (24%) were issued under the same indicator as the previous round. Two states had two repeated recommendations. Only Indicator 1.1 had more recommendations in the second round because only three states were monitored on this in the first round. Although there were fewer findings and recommendations for most indicators, several states were cited for the same issues as in the prior monitoring visit.

Recent Developments in EHCY and SASA Program Monitoring

SASA issued its 2009-10 Monitoring Plan in August 2009 in advance of a new cycle of SEA monitoring under a new political administration, the allocation of American Recovery and Reinvestment Act (ARRA) funds for Title I, Parts A and D (Subpart 2) and the EHCY programs, and with reauthorization of the Elementary and Secondary Education Act on the horizon. ARRA fiduciary indicators were added for all three programs. The EHCY had further revisions and reorganization as follows:

- Monitoring of LEAs with and without subgrants on implementation of McKinney-Vento requirements was moved from Fiduciary Indicator 3.4 to Standards, Assessment and Accountability Indicator 1.1, which is closer to SASA’s overarching monitoring indicator

- Instructional Support Indicators 2.1 and 2.2 were more clearly separated so that 2.1 focuses on program coordination and collaboration within the SEA and with other state agencies and statewide organizations and 2.2 focuses on technical assistance provided to all LEAs, with and without subgrants
- Fiduciary Indicator 3.2 was made to focus on the SEA reservation for state-level coordination activities.
- The old indicator focusing on the LEA homeless reservation to provide comparable services was kept under Title I, Part A Fiduciary Indicator 3.3
- The Title I, Part A and McKinney-Vento program coordination requirement was put under EHCY Indicator 2.1.

Besides these changes of Indicators, SASA also selected SEAs that were “shared risk” or “higher risk” of multiple recurring program compliance concerns. Several SEAs were visited in FFY 2009 that had also been visited in FFY 2008.

Table 8: Number of States Receiving a Finding or Recommendation in FFY 2009 by Result and Indicator Number (16 states)

	1.1	2.1	2.2	3.1	3.2	3.3	3.4
	#	#	#	#	#	#	#
Finding	0	3	0	3	5	0	1
Recommendation	0	4	1	1	3	0	3

Overall, the summary shows that even these “higher risk” SEAs are receiving fewer findings and recommendations in this third round. One of the top compliance concerns still seems to concern coordination between Title I, Part A and EHCY programs. The new Fiduciary Indicator 3.2 has shown more clearly that some SEAs are not providing sufficient capacity or oversight of funds for state-level coordination activities.

SASA has experimented with conducting remote reviews by videoconference with three SEAs for the EHCY and Title I, Part D programs: Delaware in September 2008 and Wyoming and New Hampshire in September 2009. While these reviews went smoothly in terms of technology, much of the monitoring for these programs is conducted by consultants who do not have access to videoconference equipment and there seems to be a preference for site visits even by SEAs and LEAs. For SEAs that still have multiple recurring findings, OESE and SASA have decided to provide on-site monitoring-related technical assistance. For the EHCY program, this is coordinated by NCHE and may involve consultants.

Undoubtedly, SASA will continue to monitor its formula grants to SEAs through pre-site document reviews, on-site interviews, and documented corrective action and on-site technical assistance. When the Elementary and Secondary Education Act is reauthorized, this process will pause to incorporate statutory changes and to approve State Plans for its programs. OESE is now coordinating an initiative to enable and ensure that programs provide technical assistance to SEAs, LEAs and schools when this occurs.