

# State Coordinators' Handbook



# **State Coordinators' Handbook**

**National Center for Homeless Education (NCHE) by**

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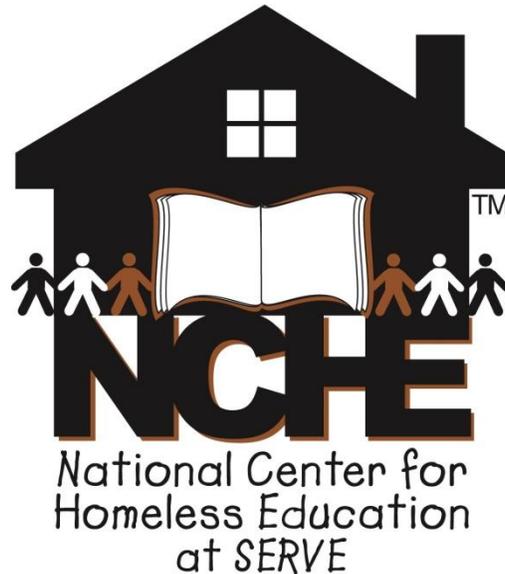
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Funded by the U.S. Department of Education, the National Center for Homeless Education (NCHE) at the SERVE Center at the University of North Carolina at Greensboro provides critical information to those who seek to remove barriers to education and to improve educational opportunities and outcomes for children and youth experiencing homelessness.



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## Abbreviations and Acronyms

ARRA	American Recovery and Reinvestment Act of 2009
AVG	Application and Verification Guide
CFR	Code of Federal Regulations
CSPR	Consolidated State Performance Report
ED	United States Department of Education
EDGAR	Education Department General Administrative Regulations
EHCY	Education of Homeless Children and Youth
EIA	Emergency Impact Aid
FAPE	free appropriate public education
FAFSA	Free Application for Federal Student Aid
FERPA	Family Educational Rights and Privacy Act
GEPA	General Education Provisions Act
HEARTH	Homeless Emergency Assistance and Rapid Transition to Housing Act
HEDA	Homeless Education Disaster Assistance
HPRP	Homeless Prevention and Rapid Rehousing Act
HUD	United States Department of Housing and Urban Development
ICC	Interagency Coordinating Council
ICH	Interagency Council on Homelessness
IDEA	Individuals With Disabilities Education Act
IEP	Individualized Education Program
LEA	Local Education Agency
MV	McKinney-Vento Homeless Assistance Act (specifically, Education for Homeless Children and Youth program)

NAEH	National Alliance to End Homelessness
NAEHCY	National Association for the Education of Homeless Children and Youth
NCHE	National Center for Homeless Education
NLCHP	National Law Center on Homelessness and Poverty
NPACH	National Policy and Advocacy Council on Homelessness
OESE	Office of Elementary and Secondary Education
OMB	Office of Management and Budget
PLC	Professional Learning Communities
RFP	request for proposal
RHYA	Runaway and Homeless Youth Act
SAP	Student Assistance Programming
SASA	Student Achievement and School Accountability
SC	state coordinator for the education of homeless children and youth
SEA	state education agency
SEAC	Special Education Advisory Council
THEO	Texas Homeless Education Office
UHY	Unaccompanied and homeless youth
USICH	United States Interagency Council on Homelessness

## **Section A. State Coordinators' Handbook Introduction**

### **A.1 Introduction**

This handbook for state coordinators who administer the Education for Homeless Children and Youth (EHCY) Program is intended to be used as a primer for new coordinators to identify critical first steps and as a resource for more seasoned coordinators as they look for ways to enhance their programs. The handbook includes the basics necessary to ensure compliance with legislative requirements and additional strategies and practices that coordinators have used to strengthen supports for students experiencing homelessness in their states that go “beyond compliance.”

Since 2002, a variety of tools have been developed to assist state coordinators in fulfilling their role. Furthermore, with the reauthorization of the Elementary and Secondary Education Act on the horizon, and the potential of new collaborations through the implementation of the Federal Strategic Plan to End Homelessness, state coordinators must be poised to learn from the past and ready themselves for the new developments of the future. This handbook is an attempt to pull existing resources together and fill in the holes that exist in the current literature to provide new (and hopefully, seasoned) state coordinators with one tool that puts a wide variety of resources at your fingertips. With that in mind, we opted for a web-based handbook that links to the existing materials on topics such as monitoring, data collection, and liaison training. We have reviewed and revised those documents, as needed. In addition, new materials have been added to address topics such as planning, evaluation, the subgrant process, fiscal responsibilities, and collaboration.

This introductory section serves two purposes. It provides an outline for the content that follows and a preassessment to assist readers in identifying the sections that would be most helpful. Each question is linked to the section of the handbook that will help you answer the question. We encourage you to test yourself before diving into the details that follow and return to these questions now and then when you feel the need for a refresher.

We would like to acknowledge and thank the many state coordinators whose efforts over the past 20+ years have informed our practice and provided the road map for

implementing federal legislation and creating real programs that serve our children. Input from state coordinators' national meetings and responses to surveys conducted by the National Center for Homeless Education (NCHE) in 2009 and 2010 were critical in the creation of this handbook. You will find quotes from these surveys throughout the Handbook. In addition, we would like to acknowledge the support of the federal coordinator at the U.S. Department of Education (ED), the National Association for the Education of Homeless Children and Youth (NAEHCY), the National Center on Homelessness & Poverty (NLCHP), and the Legal Center for Foster Care and Education. To get started, click on this link to take the State Coordinator Pretest, Appendix A-1.

## **A.2 About the authors**

Diana Bowman directs the National Center for Homeless Education (NCHE) at The SERVE Center at the University of North Carolina in Greensboro, North Carolina. Funded by the U.S. Department of Education, NCHE provides information and resources to help educators, service providers, and other stakeholders improve educational opportunities for children and youth experiencing homelessness. Diana has presented workshops on meeting the educational needs of homeless children and youth at national and state conferences and has conducted trainings for local homeless education liaisons across the nation. She has facilitated national symposia on the transportation needs of homeless children and youth, collaboration between Title I and homeless education programs, and the role and responsibilities of state coordinators for homeless education in implementing the McKinney-Vento Act. She has authored a variety of practitioner-oriented publications and articles in the areas of homeless education, collaborative program planning, and meeting the needs of children at risk. Diana also oversees the North Carolina Homeless Education Program. She holds a Master's degree in public administration from the Kennedy School of Government at Harvard University (MA), Master's degrees from Marshall University (WV) and the University of Akron (OH), and a Bachelor's degree from the College of William and Mary (VA).

Beth Garriss Hardy was the first Director of the National Center for Homeless Education at SERVE (NCHE), having been primary author of the grant that created the center in 1998. She

received her Ph.D. in Curriculum and Instruction from the University of North Carolina at Greensboro, with specialization in the Education of Exceptional Individuals. She has enjoyed a long career as an educator in various capacities, with focus on educational programming for marginalized student populations, especially those experiencing the challenges of homelessness. Now semi-retired, Dr. Garriss Hardy remains active in the homeless education arena as a consultant to the US Department of Education as a federal monitor of state implementation of homeless education programs. Owner and manager of Garriss Hardy & Associates, she also works with state and local education agencies seeking technical assistance in homeless education programs. Dr. Garriss Hardy recently authored [\*Educating Homeless Children and Youth: Conducting Needs Assessments and Evaluating Services – A Guide for SEAs, LEAs, and Local Schools\*](#). Other publications and documents related to homeless education programs include [\*Prompt and Proper Placement: Enrolling Students Without Records\*](#), and the [\*State Coordinator’s Handbook for LEA Monitoring\*](#). She also assisted NCHE with the development of a series of handbooks, [\*Connecting Schools with Displaced Students Series\*](#), following the Gulf Coast hurricanes of 2005. Beth was the 1999 recipient of the NAEHCY President’s Award for leadership in the creation of the National Center for Homeless Education.

Patricia Ann Popp is the state coordinator for the Education of Homeless Children and Youth, Project HOPE – Virginia, a collaborative initiative between The College of William and Mary and the Virginia Department of Education. Dr. Popp is a clinical associate professor for the Curriculum and Instruction Department at The College. She received her Ph.D. in Educational Policy, Planning, and Leadership with an emphasis in Special Education from The College of William and Mary, her Master's degree in learning disabilities from Virginia Commonwealth University, and her Bachelor's degree in elementary and special education from Boston University. Areas of interest and research include collaboration, children and youth experiencing homelessness and other forms of mobility issues, and students with disabilities. She is a past president of the Virginia Council for Learning Disabilities, past president of the NAEHCY, and currently serves as chair for the LeTendre Education Fund for NAEHCY.

## Appendix A-1. State Coordinator Pretest

The following questions are intended to provide an overview of the topics covered in this handbook. A pretest format will allow you to quiz yourself and determine which sections to visit.

Getting the Lay of the Land	
<p>What are the six functions of the office of the state coordinator under the McKinney-Vento Act?            What additional responsibilities must the state coordinator fulfill?            How does your state address each?</p>	Appendix B-1: Functions of the State Coordinator
<p>What federal legislation impacts your responsibilities as a state coordinator for the EHCY program?            What laws are referenced most often?            What requirements should be highlighted?            How can you learn more?</p>	Section B - Charting the Course
<p>What does McKinney-Vento EHCY look like in your state?            What is your state allocation?</p> <ul style="list-style-type: none"> <li>• What is the budget for the state and subgrants?</li> <li>• What are the Title IA reservation amounts for each LEA?</li> </ul> <p>What data are available to describe your state’s program? Where can you find the data?</p> <ul style="list-style-type: none"> <li>• How many children and youth have been identified?</li> <li>• What are the most pressing barriers homeless children and youth face accessing education?</li> <li>• What are the most common needs of homeless children and youth?</li> <li>• How are homeless children and youth performing on state assessments?</li> <li>• What actions did your state plan to implement in its State Plan? What is the status of those actions?</li> <li>• Are there any current initiatives in your state that focus on homeless children and youth or a special subgroup (e.g., early childhood, unaccompanied youth)?</li> <li>• What were the results of your state’s most recent federal program monitoring of the EHCY program?</li> <li>• Has there been a formal program evaluation or statewide needs assessment of the state’s EHCY program? What were the identified strengths and weaknesses? What recommendations were made for program improvement?</li> </ul>	Section B - Charting the Course Section C - Data Collection and Reporting
Building the “To Do List”	
<p>What do you need to do?</p> <ul style="list-style-type: none"> <li>• Today?</li> <li>• Tomorrow?</li> <li>• This year?</li> </ul> <p>Do you have a checklist? What’s on it?</p>	Section B - Charting the Course

Where can you get help?	
How can you enhance your program?	Section D - Monitoring Program Evaluation
<b>Carrying Out Your Responsibilities</b>	
How do you ensure your state's compliance? <ul style="list-style-type: none"> <li>• How do you document compliance?</li> <li>• How do you prepare for and survive a federal monitoring visit?</li> <li>• How do you prepare and conduct state monitoring of LEAs?</li> </ul>	Section C - Data Collection and Reporting  Section D - Monitoring
What types of training and technical assistance do you provide? – Who, what, when (frequency), how?	Section E - Technical Assistance for LEAs
With whom do you currently collaborate? Who is missing from your collaborative partners? How do you decide where to focus your limited resources? How can you enhance your partnerships?	Section H - Collaboration
What is your process for awarding subgrants?	Section F - McKinney-Vento Subgrant Process
How do you ensure fiscal responsibility and appropriate expenditures?	Section G - Fiscal Management
With all there is to do, how do you manage the work load?	Section B - Working Smart detail
<b>Administering Subgrants</b>	
Have you reviewed the possibility for utilizing regional subgrants?	Section I – Taking a Regional Approach to Awarding McKinney-Vento Subgrants: Advantages and Challenges of Implementation
<b>Dispute Resolution</b>	
What are good ways to address dispute resolution issues?	Section J – Dispute Resolution
<b>Native American Education</b>	
What can I learn about serving Native American students?	Section K. Strengthening Services for Native American Students Experiencing Homelessness: The Power of Relationships
<b>Disaster Preparation</b>	
What are good ways to prepare for, and respond to, a disaster?	Section L. When Disaster Strikes: What State Coordinators Need to Know and Do

## **Section B. Charting the Course: How do state coordinators plan and fulfill their responsibilities?**

State coordinators are responsible for a variety of activities as they administer the EHCY program for their states. This section of the *State Coordinators' Handbook* provides a bird's eye view of those responsibilities to help new coordinators get the big picture. Charting the Course reviews the key functions of the office of the state coordinator, including legislative references, and links to a variety of resources that have been developed to support coordinators in their work. In addition to the national view, this section provides direction to assist state coordinators in understanding what is in place within their own states. Tips for planning and making the work more manageable are included.

<b>Inquiring Minds Want to Know: What are the top five actions a new state coordinator should pursue?</b>
<ol style="list-style-type: none"><li>1. Get to know the relevant legislation.</li><li>2. Get to know your McKinney-Vento support network.<ol style="list-style-type: none"><li>a. National Center for Homeless Education (NCHE)</li><li>b. National Association for the Education of Homeless Children and Youth (NAEHCY)</li><li>c. Fellow state coordinators</li></ol></li><li>3. Get to know your state colleagues.<ol style="list-style-type: none"><li>a. Department of education</li><li>b. Other state agencies</li></ol></li><li>4. Collect and review required state documents. Use the available data to identify your state's strengths and challenges.</li><li>5. Create a plan that continues successful activities and addresses current challenges. Share that plan to garner support for its implementation.</li></ol>

### **B.1.1 What are the responsibilities of the state coordinator?**

What drives your decisions and actions as a state coordinator? The Office of Coordinator is mandated by federal legislation and is usually fulfilled by a single state coordinator (although sharing the duties of the coordinator among multiple staff is allowed by ED); legislation informs much of the work that must occur. In addition to federal mandates, practice is informed by U. S. Department of Education (ED) policy and guidance, state legislation, the needs and priorities of your state, and, hopefully, best practice. This section of the handbook will help you identify the

background information you need to understand the role of state coordinator, develop a plan to ensure compliance with mandates, and identify additional steps that can be taken to further strengthen an existing program.

To get you started, Appendix B-1 Functions of the Office of Coordinator for the Education of Homeless Children and Youth, Current Activities and Next Steps, identifies the functions of the state coordinator found in the McKinney-Vento Act. Jot down what you know about the current activities in your state in the second column. The bulleted items in the first column link to sections of this handbook and related resources that can be used to complete the “next steps” as you grow in your role and understanding of the responsibilities of the state coordinator.

### **B.1.2 What federal legislation impacts your responsibilities as a state coordinator for the EHCY program?**

Much of the work state coordinators do is shaped by federal legislation. The federal laws that most frequently come into play are found in Appendix B-2, Federal Legislation State Coordinators Should Know. After a brief description of the connection to homeless education, is a link to the actual code, related ED guidance documents or regulations, and NCHE or other federal agencies resources.

For a comprehensive listing of related federal legislation, consult the NCHE publication, [\*The Legal Glossary: A Crosswalk of Federal Laws and Programs Affecting Children, Youth, and Families Experiencing Homelessness.\*](#)

### **B.1.3 How can you become more familiar with federal expectations and stay abreast of legislative changes?**

In addition to the links in Appendix B-2, there are a number of supports state coordinators can access. For example, NCHE offers on-line trainings that are advertised to state coordinators by email and on the NCHE listserv. (NCHE automatically subscribes new state coordinators to the listserv when notified of their appointments.) Also, NCHE facilitates state coordinator meetings annually in Washington D.C. and as a half day session during the NAEHCY

annual conference. (For information on these resources, contact NCHE at 800-308-2145 or at [homeless@serve.org](mailto:homeless@serve.org).)

NAEHCY works closely with NCHE on a number of initiatives. Both provide training and technical assistance in implementing legislation related to children and youth experiencing homelessness. While NCHE is funded as the technical assistance center for ED, NAEHCY is a membership organization that can conduct advocacy initiatives beyond work that can be conducted as part of federal funding. The NAEHCY policy director sends legislative alerts when important federal legislation is being discussed. The NAEHCY website posts updates as legislation is being considered and after it is passed

Other organizations that may be helpful in staying up-to-date on federal legislation include:

- [National Alliance to End Homelessness](#)
- [National Center on Family Homelessness](#)
- [National Coalition Against Domestic Violence](#)
- [National Coalition for the Homeless](#)
- [National Law Center on Homelessness & Poverty](#)
- [National Network for Youth](#)

## **B.2 What does the McKinney-Vento EHCY look like in your state?**

There are some basic documents that provide state coordinators with the answers for the most frequently asked questions about your state's program. Consider having all these documents within easy reach, whether you use hard copies in binders or electronic files on your desktop. Ask if your state may have this information available through its data management system which would allow for access off site. If not, and you find that you need this information while out of your office, consider keeping a flash drive/data stick of items that you have in electronic form that travels easily. The following items should be easily accessible. Locating these documents is a critical early step in learning about your state's ECHY program.

- State plan and updates. Link to state plan detail in Section B.4

- Annual funding allocation data, including state and local budgets and expenditures and current balances. Link to Section G.
  - State coordinators should have access to budget information related to the use of the state reservation for state activities and be able to determine what funds have been expended and what remains for the state and each subgrantee to ensure that all funds are expended in a timely fashion.
- Consolidated State Performance Report (CSPR) data. Annual data is reported by each state to the U.S. Department of Education through the CSPR. Consider creating longitudinal charts that track achievement and identification for several years.
  - Section C
  - [NCHE trend reports and longitudinal tracking of identification and student achievement, by state.](#)
- Technical assistance logs and dispute records can be found in Section E
- Previous federal program monitoring reports for your state and Local Education Agency (LEA) monitoring reports and current protocol can be found in Section D
- Subgrant process and request for proposals and End-of-year subgrant reports can be found in Section F
- Title I homeless set aside amounts for LEAs. Information can be found in Section G
- State dispute resolution process (if assistance is needed to develop or revise your process, NCHE has a brief on dispute resolution available at: <http://center.serve.org/nche/downloads/briefs/resolution.pdf>); sample policies are available [here](#).

### **B.3 What is the state coordinator’s responsibility in ensuring the revision of state laws and policies?**

In any state that has a compulsory residency requirement as a component of the state's compulsory school attendance laws or other laws, regulations, practices, or policies that may act as a barrier to the enrollment, attendance, or success in school of homeless children and youths, 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. [Section 721(2)]

While this responsibility is placed upon the state rather than specifically with the state coordinator, the state coordinator is in the best position to identify potential barriers and initiate steps that will lead to needed revisions.

### **B.3.1 State code**

The following list provides suggestions for initial review of state code to identify the most common barriers or inconsistencies with McKinney-Vento. This list is not exhaustive and a review of technical assistance and barrier tracking data is needed to identify specific state and local issues that arise:

- Compulsory education
- Enrollment requirements, including health and immunization records
- Residency requirements
- Guardianship requirements
- Attendance requirements
- Pupil transportation requirements
- Pupil record transfer
- Emancipation
- Runaway reporting
- Consent for medical treatment
- Any specific reference to homeless children and youth or the McKinney-Vento Act, including how homelessness is defined
- References to youth in foster care, especially if included with students experiencing homelessness

[Alone Without A Home](#) summarizes state code related to unaccompanied youth.

In the February 2010 State Coordinator survey, Table B-1 highlights the types of state code were identified as having either a positive or negative impact on the work of the coordinator.

**Table B-1. State code changes that affect a state coordinator’s work.\***

<b>State Code With Positive Impact</b>	<b>State Code With Negative Impact or Barrier</b>
Change in transportation law <ul style="list-style-type: none"> <li>– transporting students on “yellow” buses is no longer a requirement,; this made it easier for LEAs to explore other options</li> <li>– creating a statewide process for the reimbursement of parents for mileage if transporting to school of origin removed the variation among LEAs</li> </ul>	Truancy laws <ul style="list-style-type: none"> <li>– student consequences can be barriers to credit accrual</li> <li>– school/LEA consequences (e.g., Adequate Yearly Progress-AYP) can lead to reluctance in enrolling students with patterns of high absenteeism</li> </ul>
Alignment with McKinney-Vento for definitions and immediate enrollment <ul style="list-style-type: none"> <li>– removing inconsistencies avoids confusion</li> </ul>	Foster care language <ul style="list-style-type: none"> <li>– sometimes confusing when mixed with homeless requirements</li> </ul>
Enrollment without an address <ul style="list-style-type: none"> <li>– having an address is a common requirement but one that can be a barrier for students who are homeless</li> </ul>	Running away identified as a status offense <ul style="list-style-type: none"> <li>– schools may be reluctant to enroll a student whose actions are considered a status offense</li> </ul>
Avoiding the word “homeless” and requiring schools to enroll students who are not supervised by a parent or guardian <ul style="list-style-type: none"> <li>– eliminating the stigma of “homeless”</li> <li>– removing the need to make a homeless determination on gray area UY cases</li> </ul>	Waivers for immediate enrollment with a 30-day timeline to provide missing documentation <ul style="list-style-type: none"> <li>– When students have not provided needed document within the limit, they are disenrolled.</li> </ul>

\*Please note that these columns are not necessarily parallel.

### **B.3.2 State policy**

The same topics listed for state code should be reviewed among state policies adopted by the state board of education. In addition, look for the following topics:

- State special education regulations. In particular, sections to review most closely are those related to evaluation and eligibility and provision of FAPE (free appropriate public education and following a special education Individualized Education Program or IEP) when a student moves and the appointment of a temporary surrogate for unaccompanied homeless youth.
- The state’s dispute resolution process for McKinney-Vento. (This process may be found in policy or addressed through procedures and guidance.)
- School nutrition eligibility for free meals.
- If your state policies include reference to participation in extracurricular activities, including sports, be sure to familiarize yourself of the requirements and identify any

potential barriers or conflicts that may arise within the context of McKinney-Vento. See NCHE brief: [Ensuring Full Participation in Extra-Curricular Activities for Students Experiencing Homelessness](#).

### **B.3.3 State guidance documents**

States may use a variety of vehicles to provide guidance on practices to localities. Policy memos, state superintendent memoranda and email alerts, and resource manuals may exist. Again, in addition to the topics listed above, look for resources that reference the following topics:

- Your state’s homeless education website. NCHE links to [all state websites](#) if you are looking for ideas
- State homeless education forms if your state has developed statewide identification, enrollment or referral forms
- Identification and data collection for homeless status and primary nighttime residence
- McKinney-Vento subgrant process and fiscal procedures for budgets, amendments, and reimbursements
- Clarification of “awaiting foster care”
- Title I, Part A reservation guidance or Q&A documents
- Truancy prevention and graduation rates and initiatives
- Which LEA is responsible for special education services when a student remains in his/her school of origin but the family has moved to another school district

### **B.3.4 What do you do when a discrepancy is identified?**

Article VI of the U. S. Constitution, known as the Supremacy Clause, states that federal law supersedes state and local law and policy. The Supremacy Clause can be of assistance while working to amend local and state policies and procedures that are in conflict with the McKinney-Vento Act. When McKinney-Vento and state or local processes are in conflict, McKinney-Vento should be followed. Despite this clause, the most effective way to remove the potential of barriers caused by such conflicts is ensuring the state and local policies are amended to avoid confusion.

Conflicts or barriers created by state laws, regulations, policies, and practices may be identified through:

- State coordinator review of extant laws and policies
- Legal challenges such as letters from advocacy law groups or lawsuits identifying barriers
- Review of technical assistance and barrier logs
- Questions and comments from the field in trainings or other meetings
- Task forces or other collaborations, for example:
  - The Kentucky State Coordinator collaborates with Kentucky Housing on the ten year plan to end homelessness.
  - Virginia convened an ad hoc group to explore issues related to unaccompanied homeless youth.
  - A number of states are exploring attendance policies, which can provide a vehicle for exploring this common barrier to success.

Appendix B-3, Steps for Revising State Code, Policies, or Procedures, outlines the steps that should be followed to make needed revisions and suggests the partners who need to be involved.

Throughout this handbook, you will find the voices of state coordinators. Look for sections entitled, “Coordinator-to-Coordinator.”

### Coordinator-to-Coordinator<sup>1</sup>

Be on the lookout for topics that overlap with homeless. It may be easier to highlight homelessness within another initiative than to push forward a stand-alone initiative.

Involve key stakeholders in drafting and advocating for the policy change.

Work with outside agencies or groups to carry out your agenda.

Start small and impact the areas that are easiest to impact first; then, move to the more difficult areas. I started by introducing an LEA policy through training for a couple years, and had others on our team talk to districts about it also. Then I informed the districts that all would need to adopt a policy within the next year. This year, any district that does not have a policy will receive a finding during consolidated monitoring.

Don't be afraid to "steal" from someone else. As our former general counsel used to tell me, "There's no greater compliment in government work than plagiarism." It's also more likely to pass the 'censors' and 'audits' that most of our policies have to go through.

Be persistent and stay focused.

#### **B.4 How do you make the state plan a useful tool?**

Section 722(g) of Title X, Part C describes the requirements of a state plan for homeless education. Every state is required to submit a plan that must be approved by the U.S. Department of Education. The process is required once during an authorization cycle. States are encouraged to review their plans and update them as state needs change, and states must submit amendments to ED should significant changes be made. A well-developed plan provides a snapshot of the current status of the program and a clear road map for future endeavors that can guide long range and day-to-day planning. After becoming familiar with the McKinney-Vento Act, new state coordinators should consider the state plan the next critical document for review.

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<sup>1</sup> Responses from February 2010 State Coordinator Survey to question: "Please share any tips you have for other State Coordinators for Homeless Education who may become involved in crafting a state homeless education policy."

A state plan is a living, working document that guides thoughtful practice. In addition, it can serve as a basis or authority for making decisions to award subgrants that address state goals and needs and in planning for and prioritizing state-level coordination activities. There is great variability among states regarding the detail in state plans and the role state plans play in shaping the day-to-day work of the state coordinator. For a new state coordinator, the first step is locating the state plan and determining whether any updates have been documented since its 2002 submission to ED. The February 2010 State Coordinator survey asked coordinators when the state plan was last reviewed. Of the 35 respondents, more than one third had not made changes to the state plan since the original submitted in 2002. A number of coordinators commented that the plan was outdated and lacked usefulness in managing the current program. During the March 2008 State Coordinators' meeting, coordinators were asked to analyze their plans using a modification of the panel reviewer's guide developed by ED to approve the 2002 plans. The protocol provides a helpful springboard to discuss your state's current status and to determine if revisions are needed. Appendix B-4, The McKinney-Vento State Plan Panel Reviewer Guide, will be useful for making your state plan a useful tool.

When EHCY is reauthorized, look for NCHE hosted webinars, conference calls, and email alerts about opportunities to learn from each other. While the state coordinator may be the main author of the state plan, involving other stakeholders in its creation and revision, implementation, and monitoring of progress can lead to a richer, more effective, and useful document. If your state has an advisory board for homeless education, charging the board to assist in the development and review of the plan would be logical. If no such committee exists, consider inviting state representation from other federal programs and special education, local liaisons with and without subgrants, shelter representation, and groups that work with young children and older youth. These can be colleagues with whom the EHCY program has a strong relationship or may target new partners needed for program growth<sup>2</sup>. Some state coordinators noted that they updated their state plans in conjunction with the federal program monitoring. Looking at your state's schedule for a visit from ED could provide the impetus to start your review.

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<sup>2</sup> West Virginia has an Out-of-Home Care Task Force that meets three times a year and has included review of the state plan in the forum.

#### **B.4.1 Tips for creating or revising your state plan**

- Create a timeline. Work backward from the due date, making sure you leave sufficient time for approvals through the state’s channels.
- Review state plans from other states. Use the NCHE listserv to request samples. State Coordinators love to share with each other!
- Use the legislative requirements listed in the state plan as your road map. Labeling each section of the plan with the legal citation eases future crosswalks.
- Identify the data collected in assessing your state’s needs that addresses requirements of the state plan.
- List current practices and activities in the state that address the plan.
- Work with your team to identify practices
  - To continue
  - To adjust
  - To delete
  - To add
- Consider the benefits of specificity and generality in the plan. A plan that is too general provides little guidance for next steps. Look at your plan and ask, “If I were looking at this for the first time, would I know what I needed to do? Would I have any idea about actions that have been taken and need to be taken?” On the other hand, a plan that is too specific might require frequent amendments as the needs of the program change. Does your plan include some general tasks that can be addressed in a variety of ways? Does your plan leave room for new challenges to be addressed as they emerge?
- Follow your state’s protocol for obtaining public comment and review/approval through required channels.

#### **B.4.2 Tips for implementing the plan**

- As described in the steps to revise code, policies, and procedures (see Appendix B-3 Steps for Revising State Code, Policies, or Procedures), review all new activities and

those that will be adjusted to determine where the level of change is needed. Consider color-coding your plan to identify changes that require

- State legislation
- State policy
- State practice in conjunction with other state agencies or education offices
- Practices within the state coordinator's office
- Prioritize next steps (steps critical to compliance and “low hanging fruit”) – consider short term, midterm, and long range goal setting
  - Serious compliance issues should be the first priority. See past federal monitoring reports and copies of SEA responses if there were any findings.
  - Changes that require little effort and can be implemented quickly can be included in the short term goals. Completing activities is rejuvenating, giving you more energy to take on slower moving initiatives.
- Keep the plan alive
  - Make a commitment to conduct an annual review and update. We need time to reflect on our work to avoid spinning our wheels. Not only does the review help the state coordinator remember what is most critical and required, the documentation developed can make federal monitoring of the state program less stressful since the work has been reviewed internally multiple times.
  - The review need not be a solo activity. Consider including participants who assisted in the original plan's development and representatives from interagency committees.
  - A summary document of progress on the state plan should be shared with supervisors, the state board of education (when appropriate), other state coordinators through regional collaborations, ED to simplify document collection for monitoring, and the public through website postings, newsletter articles, and presentations.

## B.5 Working smart

The day-to-day activities that confront a state coordinator can keep you busy all day, and wondering on the way home, “What did I accomplish today?” It is easy to become so absorbed in the problems and questions from phone calls and emails, that the thought of taking time to do long-range planning seems unmanageable. However, effective leaders know that strategic planning, with specific goals and activities that are monitored, measured, and celebrated upon completion, move a program from treading water to continuous improvement.

### Coordinator-to-Coordinator

#### Tips for Managing the Work

*I've been able to use the tips on the Mind Tools website to refine my time management. ([www.mindtools.com](http://www.mindtools.com))*

*Prioritize your time.*

*Use materials already created and personalize for your state.*

*Use education initiatives already in place and use connections to other education resources.*

*Infuse MV issues into other high profile issues.*

*Thoroughly understand the law and the requirements.*

*Use monitoring findings to understand expectations of job better and to help align your program more to what the federal government wants.*

*Plan! I can see the eyes rolling as I write this! You are thinking, “How can you expect me to spend time on planning when I don't have the staff needed to meet my basic responsibilities?” Right? But think about it, if you lay out the “have to's” and “would like to's,” and estimate the time needed for each, the average work week, month, and year is unlikely to have the capacity needed. While economy will limit what can occur, aren't you more likely to gain additional resources if you consistently present your supervisors and those with the purse strings with clear plans that delineate what needs to get done and what is needed to get it done? Do you ask your supervisor to help you make the tough choices and prioritize? Rather than solely focusing on those items you haven't accomplished, do you have a means to identify and celebrate accomplishments? If you have the luxury of dedicated staff and resources, how do you ensure that these resources are perceived as well invested in your program? My argument here is that planning is critical to getting and maintaining needed resources. It will not happen overnight, but the person with multi-level plans that include the musts and “it would be nice” do receive the offers to explore initiatives when funds are available, especially when they maintain a well-organized and timely program.*

### **B.5.1 Backward design for state coordinators**

A well-respected approach to long-range planning for students that has emerged through the standards-based reform movement is the idea of Backward Design.<sup>3</sup> Rather than “winging it” daily, sticking with content that is most interesting to the teacher, or page-by-page through a textbook, Backward Design requires educators to start with the standard that the state requires students to master. This must be unpacked to determine exactly what essential questions students should be able to answer and what skills and knowledge students must have to be able to determine that the standard has been met. Once the skills and knowledge have been identified, then ways to measure the students’ attainment of those skills and knowledge are developed. Only then does the work of determining what activities and resources are needed for lessons to begin. Teachers are being asked to plan with the end in mind.

Can this same process be applied to the work of a state coordinator? The McKinney-Vento Act provides us with our standards. Rather than knowledge and skills for students, the state plan should provide the road map for creating an effective state program which, in turn, can nurture effective local programs. Annual plans and monthly plans have a lot in common with teachers’ pacing guides, and weekly to-do lists and schedules are not so very different from weekly lesson plans. When teachers take the time to thoughtfully identify their students’ needs and select activities and resources to learn new concepts, they are better teachers, when state coordinators take the time to carefully identify barriers children and youth experiencing homelessness face accessing and succeeding in school and take actions to remove those barriers and ease greater access, they can become better state coordinators.

### **B.5.2 Creating an annual scope of work**

An annual scope of work document can provide the bridge between the state plan and the day-to-day activities of the office. Take the activities listed in your state plan and identify what steps can reasonably be taken within one year. Target deadlines for different items and plot on a calendar; be sure to include other activities that occur each year whether or not there

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<sup>3</sup> Wiggins, G., & McTighe, J. (2005). *Understanding by design, (expanded 2nd edition)*. ASCD: Alexandria, VA.

is a specific activity in the plan. (See making time visual for a sample calendar.) Don't forget to look at the plan! Add a tickler to your monthly calendars with a date each month that you plan to spend 30 minutes reviewing your proposed activities. Make adjustments as needed. Most of us are wonderful at underestimating the amount of time something will take to accomplish. Plotting the time and making changes along the way can help us become more realistic in our estimates.

### B.5.3 Prioritizing

One way to approach the multiple demands placed on state coordinators is to look at Stephen Covey's *Seven Habits of Effective People*. Covey suggests that work can be categorized into four quadrants, as illustrated in Figure B-1. Below we will provide examples of real state coordinator duties that we think fit in each quadrant.

**Figure B-1. Covey's Quadrants<sup>4</sup>**

<b>Quadrant I</b> Important and Urgent	<b>Quadrant II</b> Not-Urgent
<b>Quadrant III</b> Not important and Urgent	<b>Quadrant IV</b> Not Important and Not Urgent

Effective people try to spend as much time as they can in Quadrant II and to limit time spent in Quadrant IV. This proactive strategy of focusing on important work that is not urgent and avoiding time wasters can reduce the need to address Quadrant I issues. Prioritizing your work by determining in which quadrant the task would fall can help you decide where to spend your time. Note that a number of tasks may begin in Quadrant II but become Quadrant I if not completed in advance. For example, planning your data submission for CSPR as a long range project may have a number of steps that, if addressed early, are important but not urgent. Without preplanning, the submission of data can "creep up on you" and become an urgent, deadline-driven project. The responsibilities for state coordinators listed in the McKinney-Vento Act should be included in your priority activities. If you have additional responsibilities, for

<sup>4</sup> See for example, <http://progmanager.files.wordpress.com/2008/06/covey-quadrants.jpg>

other programs, consider creating a merged list of priorities and identifying overlapping issues that can be addressed together. Applying the quadrants to a state coordinator’s responsibilities might look something like Figure B-2.

**Figure B-2. Applying Covey’s Quadrants to State Coordinator Activities**

Important	
Urgent Quadrant I	Not-Urgent, Quadrant II
Dispute to resolve	Developing an annual plan
Responding to parents or LEAs to provide critical technical assistance (ensure compliance when questions arise)	Developing relationships with partners who can move initiatives ahead
Intervening to get a child experiencing homelessness enrolled	Staff meetings to prioritize and assign work
Responding to time sensitive requests from lawmakers, media, public, supervisors	Conducting a comprehensive needs assessment or program evaluation
Finalizing the CSPR data	Providing liaison trainings
Finalizing budgets and subgrant awards	Monitoring LEAs
Not Important	
Urgent, Quadrant III	Not Urgent, Quadrant IV
Mandatory staff meetings not related to homeless students and their needs	Checking email every few minutes
Responding to requests for information that could be accomplished by clerical staff	“Visiting” with colleagues to avoid calling a dissatisfied parent or superintendent
Recreating summaries of data for special requests that could have been developed and posted to the Web for easy public access	Re-copying to do lists
	Reading tangential newsletters or articles

#### B.5.4 Make time visual

Assigning tasks to specific blocks of time provides a visual representation of time and can help you learn how to estimate the time needed for various activities. If you are already a list maker, this approach just adds the time blocks. The time block could be a year, quarter, month, week, day, or even an hour. The following sample calendars have a number of Quadrant II tasks (that could become Quadrant I if not addressed). Items that are done monthly or daily are not listed here but should be part of your monthly/weekly/daily calendars. You can use a regular calendar.

- Appendix B-5 Sample Annual Planning Calendar (aligned for state fiscal year) is adjusted to reflect the fiscal year and is more aligned to the school year.
- Appendix B-6 Sample Monthly Planning Calendar (September) is a sample September calendar
- Appendix B-7 Sample Weekly Planning Calendar takes one week from the September calendar and breaks the days into hours.
- Appendix B-8 Sample Scope of Work for North Carolina Homeless Education Program (NCHEP) July 1, 2009 - June 30, 2010 is a sample scope of work plan which offers another method of listing all the work to be done..

Many state coordinators must juggle their McKinney-Vento responsibilities with those of other federal and state programs. Taking the time to plan and prioritize what steps must be taken is critical when time is limited. Here are some tips to assist you in making the job more manageable:

- Ask for assistance from the support network available to state coordinators
  - NCHE
  - NAEHCY
  - Other state coordinators – the culture among coordinators is very collegial and willingness to share expertise, challenges, and successes is the name of the game
- Look for ways to infuse homeless education into issues with a higher profile in the state. Keeping Maine’s Children Connected grew out of the recognition of overlapping goals and priorities among the EHCY program, reintegration efforts for youth exiting correctional facilities, improving educational outcomes for youth in foster care, and their psychiatric facility and school transition initiative.
- Use materials that have already been created. It is a compliment to have work modified and used by another coordinator. Asking for permission (if the material is not posted for sharing) and acknowledging the source is always appreciated.
- Use knowledgeable liaisons to assist with training and technical assistance.

- Form regional groups that can approach a seasoned liaison for assistance before contacting the state coordinator. With large states, like California, and smaller states with part-time state coordinators, such as New Hampshire, this approach has been effective.
- Designate knowledgeable and skilled liaisons to represent the state coordinator at interagency meetings and to present at conferences. Be sure to have a process to oversee activities and receive updates from your designees.

**Appendix B-1. Functions of the Office of Coordinator for the Education of Homeless Children and Youth, Current Activities and Next Steps**

<b>McKinney-Vento Section</b> <ul style="list-style-type: none"> <li>• <a href="#">Resource Links</a></li> </ul>	<b>Function</b>	<b>Current Activities</b>	<b>Next Steps</b>
<b>Section 722(f) 1</b> <ul style="list-style-type: none"> <li>• <a href="#">Section C</a></li> <li>• <a href="#">Section D</a></li> <li>• <a href="#">Conducting Needs Assessments and Evaluating Services - A Guide for SEAs, LEAs, and Local Schools</a></li> </ul>	Gather reliable, valid, and comprehensive information on the nature and extent of the problems homeless children and youths have in gaining access to public preschool programs and to public elementary schools and secondary schools, the difficulties in identifying the special needs of such children and youths, any progress made by the State educational agency and local educational agencies in the state in addressing such problems and difficulties, and the success of the programs under this subtitle in allowing homeless children and youths to enroll in, attend, and succeed in, school.	Example: CSPR data is reported on time and used for annual planning.	Example: Convene task force of early childhood providers and liaisons to identify needs and develop resources.
<b>Section 722(f) 2</b> <ul style="list-style-type: none"> <li>• <a href="#">Section B.4</a></li> </ul>	Develop and carry out the state plan described in subsection (g).	Example: Reviewed annually and incorporated into annual plan.	
<b>Section 722(f) 3</b>	Collect and transmit to the Secretary, at such time and in such manner as the Secretary may require, a report containing such information	Example: CSPR data submitted on time.	Example: Work with EDFacts on new data collection memo.

<b>McKinney-Vento Section</b> <ul style="list-style-type: none"> <li>• <a href="#">Resource Links</a></li> </ul>	<b>Function</b>	<b>Current Activities</b>	<b>Next Steps</b>
<ul style="list-style-type: none"> <li>• <a href="#">Section C</a></li> </ul>	as the Secretary determines is necessary to assess the educational needs of homeless children and youths within the State.		
<b>Section 722(f) 4</b> <ul style="list-style-type: none"> <li>• <a href="#">Section B</a></li> <li>• <a href="#">Section H</a></li> </ul>	Facilitate coordination between the state educational agency, the state social services agency, and other agencies (including agencies providing mental health services) to provide services to homeless children, including preschool-aged homeless children and youths, and to families of such children and youths.	Example: Serve on Interagency Coordinating Council (ICC), Special Education Advisory Council (SEAC), and homeless coalition.	Example: Expand work with family life educator to address UHY health issues.
<b>Section 722(f) 5</b> <ul style="list-style-type: none"> <li>• <a href="#">Section B</a></li> <li>• <a href="#">Section H</a></li> </ul>	In order to improve the provision of comprehensive education and related services to homeless children and youths and their families, coordinate and collaborate with-- (A) Educators, including child development and preschool program personnel.	Example: Member of state’s early childhood priority project.	
	(B) Providers of services to homeless and runaway children and youths and homeless families (including domestic violence agencies, shelter operators, transitional housing facilities, runaway and homeless youth centers, and transitional living programs for	Example: Member of state homeless coalition.	Example: Participate in the coalition’s conference (presentation and table display).

<b>McKinney-Vento Section</b> <ul style="list-style-type: none"> <li>• <a href="#">Resource Links</a></li> </ul>	<b>Function</b>	<b>Current Activities</b>	<b>Next Steps</b>
	<p>homeless youths).</p> <p>(C) Local educational agency liaisons designated under subsection (g)(1)(J)(ii) for homeless children and youths</p> <p>(D) Community organizations and groups representing homeless children and youths and their families.</p>	<p>Example: Regional liaison trainings conducted every fall.</p> <p>Example: Database includes local programs for communication. Maintain web site.</p>	<p>Example: Hold one day summits on data and UHY.</p>
<b>Section 722(f) 6</b> <ul style="list-style-type: none"> <li>• <a href="#">Section E</a></li> <li>• <a href="#">Local Liaison Toolkit</a></li> <li>• <a href="#">Other NCHE Training Resources</a></li> </ul>	<p>Provide technical assistance to local educational agencies in coordination with local educational agency liaisons designated under subsection (g)(1)(J)(ii), to ensure that local educational agencies comply with the requirements of section 722(e)(3) and paragraphs (3) through (7) of subsection (g).</p>	<p>Example: Maintain state web site, ongoing TA from calls and emails.</p>	<p>Example: Review LEA monitoring results and develop webinar to address common findings/concerns.</p>
<b>721</b> <b>STATEMENT OF POLICY</b> The following	<p>(1) Ensure that each child of a homeless individual and each homeless youth has equal access to the same free, appropriate public education, including a public preschool</p>	<p>Example: Review local policies.</p>	<p>Example: Track TA and barrier calls that suggest access challenges.</p>

<b>McKinney-Vento Section</b> <ul style="list-style-type: none"> <li>• <a href="#">Resource Links</a></li> </ul>	<b>Function</b>	<b>Current Activities</b>	<b>Next Steps</b>
<ul style="list-style-type: none"> <li>• <a href="#">Section B</a></li> </ul>	education, as provided to other children and youths.		
	(2) In any state that has a compulsory residency requirement as a component of the state’s compulsory school attendance laws or other laws, regulations, practices, or policies that may act as a barrier to the enrollment, attendance, or success in school of homeless children and youths, 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.	Example: State code reviewed to align with McKinney-Vento.	
	(3) Homelessness alone is not sufficient reason to separate students from the mainstream school environment.	Example: No separate public schools exist in state.	

<b>McKinney-Vento Section</b> <ul style="list-style-type: none"> <li><a href="#">Resource Links</a></li> </ul>	<b>Function</b>	<b>Current Activities</b>	<b>Next Steps</b>
721 (cont'd)  <ul style="list-style-type: none"> <li><a href="#">Section C</a></li> </ul>	(4) 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 student academic achievement standards to which all students are held.		Example: Expand achievement data collection to all LEAs not just subgrantees.
<b>722(d)</b> ACTIVITIES  <ul style="list-style-type: none"> <li><a href="#">Section B</a></li> <li><a href="#">Conducting Needs Assessments and Evaluating Services - A Guide for SEAs, LEAs, and Local Schools</a></li> </ul>	(1) To carry out the policies set forth in section 721 in the State.	Already addressed.	
	(2) To provide activities for, and services to, homeless children, including preschool-aged homeless children, and youths that enable such children and youths to enroll in, attend, and succeed in school, or, if appropriate, in preschool programs.	Already addressed.	
	(3) To establish or designate an Office of Coordinator for Education of Homeless Children and Youths in the State educational	Established.	Example: Consider move to new department.

<b>McKinney-Vento Section</b> <ul style="list-style-type: none"> <li>• <a href="#">Resource Links</a></li> </ul>	<b>Function</b>	<b>Current Activities</b>	<b>Next Steps</b>
	agency in accordance with subsection (f).		
<b>722(d)</b> (continued) <ul style="list-style-type: none"> <li>• <a href="#">Section B.4</a></li> </ul>	(4) To prepare and carry out the state plan described in subsection (g).	Already addressed.	Example: focus on state plan item # that has not been moving.
<b>722(d)</b> (continued) <ul style="list-style-type: none"> <li>• <a href="#">Section E</a></li> </ul>	(5) To develop and implement professional development programs for school personnel to heighten their awareness of, and capacity to respond to, specific problems in the education of homeless children & youths.	Example: Annual trainings, conferences established.	Example: Expand work with local university to offer trainings.
<b>722(e) STATE AND LOCAL SUBGRANTS</b> <ul style="list-style-type: none"> <li>• <a href="#">Section F</a></li> </ul>	(1) MINIMUM DISBURSEMENTS BY STATES – From the sums made available each year to carry out this subtitle, the State educational agency shall distribute not less than 75 percent in subgrants to local educational agencies for the purposes of carrying out section 723, except that States funded at the minimum level set forth in subsection (c)(1) shall distribute not less than 50 percent in subgrants to local educational agencies for the purposes of carrying out section 723.	Example: Allocations consistent with code.	

<b>McKinney-Vento Section</b> <ul style="list-style-type: none"> <li>• <a href="#">Resource Links</a></li> </ul>	<b>Function</b>	<b>Current Activities</b>	<b>Next Steps</b>
<b>722 (e)</b> (continued) <ul style="list-style-type: none"> <li>• <a href="#">Section G</a></li> </ul>	(2) USE BY STATE EDUCATIONAL AGENCY- A State educational agency may use funds made available for State use under this subtitle to conduct activities under subsection (f) directly or through grants or contracts.	Example: Fiscal monitoring in place.	Example: Work with grants office on new web-based processing.
<b>722(g)(2)</b> <b>State Plan Compliance</b> <ul style="list-style-type: none"> <li>• <a href="#">Section D</a></li> </ul>	(A) IN GENERAL- Each plan adopted under this subsection shall also describe how the state will ensure that local educational agencies in the State will comply with the requirements of paragraphs (3) through (7). (B) COORDINATION- Such plan shall indicate what technical assistance the State will furnish to local educational agencies and how compliance efforts will be coordinated with the local educational agency liaisons designated under paragraph (1)(J)(ii).  Also: Section 80.40 of the EDGAR (Education Department General Administrative Regulations) requires that the State, as the grantee, is responsible for monitoring grant and subgrant-supported activities to assure compliance with applicable Federal requirements.	Example: LEA monitoring plan in place.	

## Appendix B-2. Federal Legislation State Coordinators Should Know

Legislation	Highlights for SC Responsibilities	Legislation ED, NCHE, and Related
Education for Homeless Children and Youth Program in the McKinney-Vento Homeless Assistance Act, Title X, Part C of the Elementary and Secondary Education Act	The primary law that directs the work of state coordinators. Becoming familiar with this legislation is an important first step to become familiar with the responsibilities of state coordinators. The role of the state coordinator and the requirements for a State plan are addressed in Sections 722(f) 722(g). These sections provide the structure to state level activities related to homeless education.	<a href="#">Public Law 107–110: Title X, Part C</a> <a href="#">ED M-V Guidance</a> <a href="#">NCHE M-V At-A-Glance</a>
Title I, Part A	Students experiencing homelessness are automatically eligible for Title I, Part A support. McKinney-Vento and Title I require collaboration between the two programs in planning. LEAs are required to reserve Title I, Part A funds to serve homeless students not enrolled in Title I schools.	<a href="#">Public Law 107–110: Title X, Part C</a> <a href="#">Public Law 107–110: Title I, Part A</a> <a href="#">ARRA Title I Guidance Question</a> <a href="#">NCHE resources</a>
Education of Migratory Children, Title I, Part C	By definition, a migrant student who lacks a fixed, regular, and adequate nighttime residence should be considered homeless and served by both laws. Coordination with the migrant education program can assist in accurate identification and outreach for these students.	<a href="#">Public Law 107–110: Title I, Part C</a> <a href="#">Title I, Part C</a>
The Individuals With Disabilities Educational Improvement Act (IDEA)	Students experiencing homelessness are more likely than their housed peers to be diagnosed with a disability, making special education an important partner for serving homeless students. Homeless educators have the responsibility to	<a href="#">Public Law 108-446</a> <a href="#">ED IDEA website</a> <a href="#">OSERS Q&amp;A</a>

Legislation	Highlights for SC Responsibilities	Legislation ED, NCHE, and Related
	ensure students have access to needed services, including special education, and early intervention services for infants and toddlers served by Part C. IDEA has specific mandates that support this objective, including targeting homeless children and youth in Child Find activities, addressing mobility during evaluations once services are in place, and ensuring unaccompanied homeless youth have access to special education.	<a href="#">NCHE briefs</a> <a href="#">NECTAC link to Part C agencies</a>
Family Educational Rights and Privacy Act (FERPA)	Procedures for releasing student information to service providers, and transferring records when students change schools must comply with Family Educational Rights and Privacy Act (FERPA). FERPA is an important reference when releasing records to a receiving school for an unaccompanied youth. A sending school can release records without parent permission if the district includes such a statement in its annual FERPA notice to parents. This information is often in the Parent Handbook. See FERPA sections 99.31(2) and 99.34.	<a href="#">20 U.S.C. § 1232g; 34 CFR Part 99</a> <a href="#">ED Policy Guidance</a>
Higher Education Opportunity Act	Students identified as unaccompanied homeless youth may complete the Free Application for Federal Student Aid (FAFSA) as independent students. Liaisons can provide verification of status.	<a href="#">Public Law 110-315</a>
Emergency Impact Aid;	One-time legislative initiatives – often overseen by state	<a href="#">Public Law 110-329</a>

Legislation	Highlights for SC Responsibilities	Legislation ED, NCHE, and Related
Homeless Education Disaster Assistance (HEDA); M-V American Recovery and Reinvestment Act of 2009 (ARRA)	<p>coordinators. Emergency Impact Aid (EIA) is closed, but you may have historical records from Hurricanes Rita and Katrina; Homeless Education Disaster Assistance (HEDA) funds to address natural disasters in 2008 are available through September 30, 2010.</p> <p>M-V American Recovery and Reinvestment Act of 2009 (ARRA) funds are available February 12, 2009 to September 30, 2011.</p>	<p><a href="#">ED HEDA Guidance</a></p> <p><a href="#">ARRA website</a></p>
Homeless Prevention and Rapid Rehousing (HPRP – HUD ARRA funds); Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act	<p>United States Department of Housing and Urban Development (HUD) programs are guided by the housing section of the McKinney-Vento Act. Reauthorization expands the HUD definition of homeless to include more situations that are recognized by EHCY. Remaining situations that HUD does not recognize as homeless are now considered individuals at risk of becoming homeless. With a greater emphasis on homeless prevention in HEARTH and HPRP, the opportunities to work with housing partners have increased. Furthermore, the recent reauthorization places greater emphasis on housing coordination with education. EHCY also has a mandate for coordination.</p>	<p><a href="#">HPRP</a></p> <p><a href="#">HEARTH</a></p> <p><a href="#">U.S. Interagency Council on Homelessness (USICH)</a></p>
Improving Head Start for School Readiness Act of 2007	<p>Young children experiencing homelessness are automatically eligible for Head Start services. Homelessness is one of the priority populations Head Start must serve. Head Start grants</p>	<p><a href="#">Head Start Act</a></p> <p><a href="#">OHS list of state collaboration</a></p>

Legislation	Highlights for SC Responsibilities	Legislation ED, NCHE, and Related
	go directly to localities, but each state has a state collaboration director. Both McKinney-Vento and Head Start require communication and collaboration between the two programs.	<a href="#">directors</a>
Runaway and Homeless Youth Act (RHYA)	Provides funding to local programs that serve a subpopulation of youth included in the definition for homeless used by EHCY. Street outreach program, basic center programs, transitional living programs, and maternity group homes are funded by RHYA. Coordination with these programs is required.	<a href="#">Runaway and Homeless Youth Act</a> <a href="#">List of RHYA subgrants</a> <a href="#">ACF – Family and Youth Services</a>
Fostering Connections to Success and Increasing Adoptions Act	Requires child welfare to collaborate with schools to ensure immediate enrollment and school stability for children in care. Clarifying who is served as “awaiting foster care” in McKinney-Vento and the similarity of Fostering Connections to McKinney-Vento EHCY means state coordinators may be involved in implementation.	<a href="#">Public Law 110-351</a> <a href="#">CHE briefs and related links</a> <a href="#">Bureau of Children</a>
Child Nutrition and WIC Reauthorization Act	Children who are homeless are categorically eligible for free meals. With verification by a homeless liaison or shelter director, no application is required.	<a href="#">Public Law 108-265</a> <a href="#">U.S. Department of Agriculture Memos on the Food Research and Action Center</a>

### Appendix B-3. Steps for Revising State Code, Policies, or Procedures

1. Clearly define problem and who needs to be involved (locus of control). Determining what a successful outcome would be should be part of this process. That way, you can embed evaluation throughout the process and have the needed evidence of the change’s effects and the success of your efforts.	
Type of Problem/Conflict	Who Needs to be Involved?
Legal conflict requiring change to state law	State education attorneys, Attorney General’s Office (advocacy lawyers may be involved)
Procedural/implementation challenge that requires communication across agencies	Depends on level of oversight or independence the state coordinator has in working with other state agencies
Policy conflict requiring amendment to state policy	State board of education, state department of policy education staff
Procedural/implementation challenge that requires communication across programs	Depends on level of oversight or independence the state coordinator has in working within the state department of education and the organization of programs within the agency
Procedural/implementation challenge specific to homeless education practices	Primarily in-house efforts by the state coordinator and staff and working with local homeless education liaisons – may still need sanction of supervisors and/or state superintendent
2. Obtain “buy-in” for change	
Select key informants	Invite knowledgeable people to suggest changes and comment on changes – note this may need to follow a public comment process for state policies (Who are the experts? Who administers the programs involved? Who is affected by the changes?)
Justify the need for a change	<ul style="list-style-type: none"> <li>• Legal mandates</li> <li>• Impact on students, including anecdotal stories</li> <li>• Impact on school accountability – AYP, on-time graduation rate, other available data</li> </ul>

3. Work with key informants to generate alternatives and select actions that are most promising.	
4. Roll out the change, include your key informants in planning how to announce and implement the change	
Shape the message	Provide context and justification for change; emphasize the intended benefit, including how the change builds on previous efforts if appropriate; be honest about the effort that may be required and acknowledge those efforts; if multiple audiences will need the information, will it need to be presented with different emphases to have the most impact?
Identify audiences and vehicles for the message	Who needs the information? How does the message go out? (state level memoranda, letters, email, web announcements, trainings, articles/announcements in newsletters)
5. Monitor the effect of change. Do not forget to plan from the start how you will know if the change has been effective (building in evaluation).	

**Appendix B-4. McKinney-Vento State Plan Panel Reviewer Guide (Abbreviated Version  
Adapted for State Coordinator Review at the Annual State Coordinators' Meeting February  
2008)**

**GENERAL QUESTIONS FOR REVIEW**

Yes  No  Don't Know 1. I have (or my predecessor has) used my state's plan as a framework to implement the McKinney-Vento Act.

Yes  No  Don't Know 2. I have (or my predecessor has) reviewed my state's plan since its original development in 2002.

Yes  No  Don't Know 3. I have (or my predecessor has) revised my state's plan since its original development in 2002.

**REVIEWING PLANS USING REQUIRED CRITERIA**

The Department's criteria for state plans are identified in the statute under Section 722(g). While the statute reflects what needs to be included in an effective state plan, states are free to organize their plans in ways that respond to their own needs, and ways to best implement the McKinney-Vento statute. At a minimum, however, the state plan must include all the stated elements required in the McKinney-Vento state plan that is consistent with the stated purposes and requirements of the statute and internally consistent with a state's identified needs.

**Item #1: Does the state plan adequately describe the state's procedures for ensuring that homeless children and youth are given the opportunity to meet the same challenging state academic achievement standards that all students in the state are expected to meet?**

Yes  Somewhat  Not at all  Don't Know

What have we learned since the 2002 reauthorization that could be used to strengthen the part of the plan that addresses this criterion?

What information should be included regarding this criterion to make the state plan a more useful document?

**Item #2: Does the state plan adequately describe procedures the state will use to identify homeless children and youth in the state and to assess their special needs?**

\_\_\_ Yes \_\_\_ Somewhat \_\_\_ Not at all \_\_\_ Don't Know

What have we learned since the 2002 reauthorization that could be used to strengthen the part of the plan that addresses this criterion?

What information should be included regarding this criterion to make the state plan a more useful document?

**Item #3: Does the state plan adequately describe procedure for the prompt resolution of disputes regarding the educational placement of homeless children and youths?**

\_\_\_ Yes \_\_\_ Somewhat \_\_\_ Not at all \_\_\_ Don't Know

What have we learned since the 2002 reauthorization that could be used to strengthen the part of the plan that addresses this criterion?

What information should be included regarding this criterion to make the state plan a more useful document?

**Item #4: Does the state plan adequately describe the state's programs for school personnel (including principals, attendance officers, teachers, enrollment personnel, and pupil services personnel) to heighten their awareness of the specific needs of runaway and homeless youths?**

\_\_\_ Yes \_\_\_ Somewhat \_\_\_ Not at all \_\_\_ Don't Know

What have we learned since the 2002 reauthorization that could be used to strengthen the part of the plan that addresses this criterion?

What information should be included regarding this criterion to make the state plan a more useful document?

**Item #5: Does the state plan adequately describe the state’s procedures for ensuring that homeless children and youths who meet the relevant eligibility criteria are able to participate in Federal, State, or local food programs?**

\_\_\_ Yes \_\_\_ Somewhat \_\_\_ Not at all \_\_\_ Don’t Know

What have we learned since the 2002 reauthorization that could be used to strengthen the part of the plan that addresses this criterion?

What information should be included regarding this criterion to make the state plan a more useful document?

**Item #6: Does the state plan adequately describe the state’s procedures for ensuring that: homeless children have equal access to the same public preschool programs, administered by the state agency, as provided to other children in the state; homeless youths and youths separated from the public schools are identified and accorded equal access to appropriate secondary education and support services; homeless children and youths who meet the relevant eligibility criteria are able to participate in federal, state, or local before- and after-school care programs?**

\_\_\_ Yes \_\_\_ Somewhat \_\_\_ Not at all \_\_\_ Don’t Know

What have we learned since the 2002 reauthorization that could be used to strengthen the part of the plan that addresses this criterion?

What information should be included regarding this criterion to make the state plan a more useful document?

**Item #7: Does the state plan adequately describe the state’s strategies for addressing problems identified through a review of the annual CSPR and technical assistance requests?**

Yes  Somewhat  Not at all  Don’t Know

What have we learned since the 2002 reauthorization that could be used to strengthen the part of the plan that addresses this criterion?

What information should be included regarding this criterion to make the state plan a more useful document?

**Item #8: Does the state plan adequately describe the state’s strategies for addressing problems with respect to the education of homeless children and youths, including problems resulting from enrollment delays that are caused by immunization and medical records requirements; residency requirements; lack of birth certificates, school records, or other documentation; guardianship issues; or uniform or dress code requirements?**

Yes  Somewhat  Not at all  Don’t Know

What have we learned since the 2002 reauthorization that could be used to strengthen the part of the plan that addresses this criterion?

What information should be included regarding this criterion to make the state plan a more useful document?

**Item #9: Does the state plan adequately demonstrate that the state and local educational agencies (LEAs) in the state have developed, and will review and as necessary revise, policies to remove barriers to the enrollment and retention of homeless children and youths in schools in the state?**

\_\_\_ Yes \_\_\_ Somewhat \_\_\_ Not at all \_\_\_ Don't Know

What have we learned since the 2002 reauthorization that could be used to strengthen the part of the plan that addresses this criterion?

What information should be included regarding this criterion to make the state plan a more useful document?

**Item #10: Does the state plan include the state's assurance that LEA's will comply with the requirements of paragraphs in Section 722(g)(3) through (g)(7) of the Act?**

\_\_\_ Yes \_\_\_ Somewhat \_\_\_ Not at all \_\_\_ Don't Know

What have we learned since the 2002 reauthorization that could be used to strengthen the part of the plan that addresses this criterion?

What information should be included regarding this criterion to make the state plan a more useful document?

**Item #11: Does the state plan adequately describe the state’s technical assistance that the state will furnish to LEAs and how the SEA will coordinate its compliance efforts with the local educational agency liaisons designated under paragraph (1)(J)(ii) in Section 722 of the Act?**

\_\_\_\_ Yes \_\_\_\_ Somewhat \_\_\_\_ Not at all \_\_\_\_ Don’t Know

What have we learned since the 2002 reauthorization that could be used to strengthen the part of the plan that addresses this criterion?

What information should be included regarding this criterion to make the state plan a more useful document?

**Item #12: Does the state plan adequately describe how the state will use the funds it receives under this program to carry out state-level activities and to make subgrants to LEAs?**

\_\_\_\_ Yes \_\_\_\_ Somewhat \_\_\_\_ Not at all \_\_\_\_ Don’t Know

What have we learned since the 2002 reauthorization that could be used to strengthen the part of the plan that addresses this criterion?

What information should be included regarding this criterion to make the state plan a more useful document?

**GENERAL QUESTIONS FOR REVIEW**

1. What are the strengths of your state plan?
2. What are the weaknesses?
3. What could be done to increase the usefulness of the plan?
4. What would you like to know from your peers to help you strengthen your state plan?

**Appendix B-5. Sample Annual Planning Calendar (aligned for state fiscal year)**

<b>July</b>	<b>August</b>	<b>September</b>
<ul style="list-style-type: none"> <li>– Complete annual report</li> <li>– Develop new annual plan and budget</li> <li>– Prepare subgrant proposals for reviewers and hold award meeting</li> <li>– Special Education Advisory Council (SEAC)</li> <li>– Interagency Council on Homelessness (ICH) meeting</li> <li>– Update website (post new liaisons, awards, check hotlinks)</li> <li>– Check on publications; order any needed for back-to-school mailing</li> </ul>	<ul style="list-style-type: none"> <li>– Make new subgrant awards</li> <li>– Schedule fall subgrant meeting and regional trainings</li> <li>– Prepare back-to-school mailing for liaisons</li> <li>– Reminder of September deadline for LeTendre scholarships to liaisons</li> <li>– Review budgets and balance accounts to ensure those that expire 9-30 are fully expended</li> <li>– Review Title I reservations</li> </ul>	<ul style="list-style-type: none"> <li>– Make travel arrangements for annual NAEHCY conference</li> <li>– Conduct liaison trainings</li> <li>– Hold subgrant webinar</li> <li>– Close out expiring grants</li> <li>– Interagency Coordinating Council (ICC) meeting</li> <li>– Update liaison listing and list of subgrantees</li> <li>– Quarterly planning update</li> <li>– Close out expiring budget accounts</li> <li>– Prepare dates for year’s advisory board meetings</li> </ul>
<b>October</b>	<b>November</b>	<b>December</b>
<ul style="list-style-type: none"> <li>– Conduct liaison trainings</li> <li>– SEAC</li> <li>– Review data from EDFacts for Consolidated State Performance Report (CSPR); have LEAs verify local data</li> </ul>	<ul style="list-style-type: none"> <li>– NAEHCY Conference</li> <li>– Complete LEA review of CSPR data, prepare state report</li> <li>– ICH meeting</li> <li>– National Hunger and Homeless Awareness Week</li> </ul>	<ul style="list-style-type: none"> <li>– Finalize CSPR submission</li> <li>– ICC meeting</li> <li>– Quarterly planning update</li> </ul>

<p style="text-align: center;"><b>January</b></p> <ul style="list-style-type: none"> <li>– Prepare subgrant RFP process for posting in March</li> <li>– SEAC</li> <li>– ICH meeting</li> <li>– Conduct LEA monitoring training; schedule LEA monitoring visits</li> <li>– Monitor state legislative session</li> <li>– Set up and disseminate state seminar registration</li> </ul>	<p style="text-align: center;"><b>February</b></p> <ul style="list-style-type: none"> <li>– Make travel arrangements for state coordinator meeting</li> <li>– Conduct subgrant proposal training</li> <li>– Begin monitoring visits</li> </ul>	<p style="text-align: center;"><b>March</b></p> <ul style="list-style-type: none"> <li>– Attend State Coordinators’ Meeting</li> <li>– Conduct state monitoring visits</li> <li>– ICC meeting</li> <li>– Quarterly planning update</li> <li>– Finalize seminar program and check with speakers</li> <li>– Update website (post new liaisons, awards, check hotlinks)</li> </ul>
<p style="text-align: center;"><b>April</b></p> <ul style="list-style-type: none"> <li>– Meet with ED Facts staff to be clear on data collection responsibilities</li> <li>– SEAC</li> <li>– ICH meeting</li> <li>– State seminar</li> <li>– Advisory Board Meeting</li> </ul>	<p style="text-align: center;"><b>May</b></p> <ul style="list-style-type: none"> <li>– Complete monitoring reports</li> <li>– Provide guidance on data collection to LEAs</li> <li>– Recruit reviewers for subgrant proposals</li> <li>– Final report on seminar (fiscal and evaluations) and follow up with speakers</li> <li>– Form seminar planning team; set date and location for next year’s seminar</li> </ul>	<p style="text-align: center;"><b>June</b></p> <ul style="list-style-type: none"> <li>– Collect materials for annual report – review technical assistance and barriers</li> <li>– ICC meeting</li> <li>– Quarterly planning update</li> <li>– Follow up on any monitoring findings</li> </ul>

**Appendix B-6. Sample Monthly Planning Calendar (September)**

Monday		Tuesday		Wednesday		Thursday		Friday	
3	Labor Day	4	Staff meeting  Make fall travel arrangements  Review documents for Early Childhood Education (ECE) meeting	5	ECE Partnership Meeting	6	Prepare materials for trainings  Schedule advisory board dates	7	Work on budget closeout
10	Prepare for training	11	Regional Liaison Training	12	Regional Liaison Training	13		14	Finalize budget closeout
17	Update liaison listing	18	Conference call with subgrantees regarding data collection  Quarterly SC Call with USED  Review documents for Interagency Coordinating Council (ICC)	19	ICC meeting	20		21	Prepare materials for trainings
24		25	Travel day	26	Regional liaison training	27	Regional liaison training	28	Quarterly planning update

**Appendix B-7. Sample Weekly Planning Calendar**

	<b>Monday September 17</b>	<b>Tuesday September 18</b>	<b>Wednesday September 19</b>	<b>Thursday September 20</b>	<b>Friday September 21</b>
<b>8</b>	correspondence	correspondence	travel time	correspondence	correspondence
<b>9</b>	pay conference invoices	pay conference invoices	↓	pay conference invoices	pay conference invoices
<b>10</b>	liaison list update	data collection call	ICC Meeting	travel authorizations for rest of month	
<b>11</b>	↓	↓	↓		
<b>12</b>	lunch	lunch (walk and talk with assistant)	lunch (check voicemail/email)	lunch	lunch
<b>1</b>	review agenda and comments for Tuesday's data call	state coordinator quarterly call	ICC Meeting		prepare for training
<b>2</b>	↓	follow up on liaison listing inconsistencies	↓		↓
<b>3</b>	email newsletter reading	prepare for Interagency Coordinating Council (ICC) meeting (read minutes, updates, and pull files needed)	check voicemail/email		↓
<b>4</b>					
<b>5</b>					

## **Appendix B-8. Sample Scope of Work for North Carolina Homeless Education Program (NCHEP) July 1, 2009 - June 30, 2010**

### Task 1. Data Collection

- Coordinate with NC DPI (Department of Public Instruction) data and CSPR staff on annual federal data collection.

NCHEP staff will:

- Work with NC DPI data staff and keep them apprised of all communication and guidance from the US ED homeless education program related to annual data collection,
  - Review problems with past data collection and discuss ways to address the problems, and
  - Provide training and TA to LEAs specific to federal data collection.
- Collect data on educational barriers for homeless students by maintaining technical assistance and barrier tracking logs; these logs will be kept in a database and reviewed to identify common barriers and specific LEAs where barriers exist. This information will inform technical assistance to LEAs and state policy review and revision.
  - Provide training and information to LEAs to assist them with data collection for needs assessment.

### Task 2. Collaboration within the SEA

- Be part of the NC DPI Compensatory Education team by maintaining ongoing communication and attending regular meetings of the Committee of Practitioners.
- Identify areas of intersection between McKinney-Vento and other program areas; specifically, Title I, Part A, special education, charter schools, early childhood, migrant education, pupil transportation, food and nutrition; meet with coordinators to review and revise policies as needed and identify areas of coordination:
  - Title I, Part A is a **priority area** – NCHEP staff will meet with Title I, Part A staff to develop consistent policies and guidance between Title I and McKinney-Vento, develop articles for the Title I newsletter, present at Title I conferences, provide

guidance and technical assistance to help Title I staff (1) systematically identify appropriate Title I, Part A set aside amounts, (2) determine appropriate ways in which Title I, Part A funds are to be spent on homeless children and youth; and (3) show accountability for the amount set aside and spent on homeless children and youth.

- IDEA requires representation from homeless education on its state advisory council; NCHPEP staff will follow up with this requirement and attend scheduled meetings.

### Task 3. Collaboration with other agencies, not SEA

- Contact agencies, such as the Interagency Council on Homelessness, Head Start, Governor’s Advocacy Council on Children and Youth, HUD Continuum of Care, North Carolina Homeless Coalition, and set up meetings to inform them of the McKinney-Vento Act and request to serve on their committees; have links to NCHPEP on their website, submit articles to their newsletters, and present at their conferences

### Task 4. Training, TA, support for LEAs and local liaisons (priority area)

- Maintain an updated contact list for all local liaisons
- Develop and provide an orientation packet for all new liaisons; refer them to NCHPEP webinars on MV basics
- Provide regular communication to local liaisons via listserv
- Conduct five regional trainings during the school year for LEA liaisons and school personnel that includes MV overview and implementation strategies, coordination with Title I, updates from the U.S. Department of Education, and networking.
- Conduct quarterly conference calls and/or webinars for all liaisons; provide notes via listserv for those not in attendance
- Maintain and continually update a website for NCHPEP with state policies, contacts for local liaisons, links to national organizations
- Provide phone and email technical assistance to local liaisons

- Provide on-site technical assistance when necessary
- Resolve disputes
- Require LEAs to maintain TA and intervention logs and provide sample forms
- Provide materials (NCHE), such as posters, parent brochures, and school enrollment guides, for LLs to conduct training and share information with school personnel, including principals, school enrollment staff, teachers, school social workers, pupil transportation, and attendance officers and to create community awareness

**Task 5. Conduct, oversee, and monitor the MV subgrant program (priority area)**

- Review end-of-the-year reports and budgets; identify technical assistance needs
- Allocate funds when received in July
- Conduct on-site monitoring of each subgrant in the course of the two-year cycle (monitor half of subgrants in FY 2009)
  - Develop a monitoring protocol that includes a review of expenditures and project plans (Summer 2009)
  - Develop a schedule for monitoring (Summer 2009)

**Task 6. Monitoring of LEAs (priority area)**

- Conduct on-site or desk monitoring of approximately 20 percent of LEAs. Every LEA will be monitored over a five-year period. Monitoring will include a review of federal data, technical assistance/barrier log entries, and policies and procedures. Districts with indications that they are not in compliance will be prioritized for monitoring and scheduled for customized technical assistance.
- Develop desk and on-site monitoring protocols (Summer 2009)
  - Develop a schedule for desk and on-site monitoring (Summer 2009)

#### Task 7. Policy review and development (priority area)

- Review NC homeless education policies and procedures with regard to identification, enrollment, and retention of homeless students and in the areas of preschool and unaccompanied youth, Title IA, and charter schools
- Review federal data and technical assistance/barrier logs for areas where policy revision or clarification is needed
- Develop or revise policies and provide technical assistance on implementation

#### Task 8. Reporting and administration

- Provide monthly performance reports to NC DPI; have monthly meeting/call with NC DPI
- Provide annual report and annual projected scope of work to NC DPI
- Have weekly team meetings of NCHPEP staff
- Attend NAEHCY conference, both state coordinator and grant administrator
- Attend annual meeting in Washington D.C., state coordinator only

#### Task 9. Overseeing the implementation of ARRA-MV grant funds

- Provide technical assistance and guidance to LEAs on planning appropriate expenditures
- Oversee LEA reporting requirements
- Provide onsite technical assistance to LEAs as necessary
- Submit required reports to U.S. Department of Education

## Section C. Data collection and reporting

One of the most critical responsibilities of the office of the state coordinator for homeless education is that of collecting data on homeless children and youth [Sec. 722(f)(1) and Sec. 724(h)(1)]. Since the implementation of the Consolidated State Performance Report (CSPR) in School Year (SY) 2004-2005, states have been required to report verifiable data (not estimates) on the numbers and primary residences of homeless students and other information. Furthermore, since the full implementation for all SEAs of data submission via ED Facts went into effect for SY 2008-2009 data, homeless education data has been collected earlier to be programmed for submission and it may be continuously revised even after the CSPR is recertified. Data collection and verification require close coordination with SEA data departments, thorough understanding of each of the data elements, and oversight of LEAs to ensure that each submits quality data.

SEAs, in general, have made great progress in streamlining and refining their homeless data collection with the use of electronic data collection systems and universal student identifiers. Many state coordinators can now even provide liaisons with homeless student enrollment and assessment data reported separately to the SEA by the LEA for their verification. Nevertheless, some SEAs struggle to meet the data collection requirements.

As a state coordinator, you should be familiar with the data collection process in your state and work closely with your CSPR and ED Facts team to ensure all required data elements are included and the data is collected, checked, and submitted according to deadlines provided by ED. Information and updates on the Federal data collection process are provided each year by the federal program office through NCHE.

NCHE's annually updated [\*\*\*Federal Data Collection Guide for the Education for Homeless Children and Youths Program\*\*\*](#) is an important resource to assist state coordinators in reviewing federal data collection requirements for homeless students and understanding each of the data elements. Included in the Guide is background information on the CSPR and ED Facts, general instructions, definitions of terms in the data elements, and tips for State Coordinators to ensure that quality data is collected. A link to this document is provided at the end of this section.

Moreover, NCHE staff members are available to provide customized assistance in helping state coordinators understand their federal data collection responsibilities.

## **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

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

<p>from the SEA about its monitoring requirements for the McKinney-Vento program?</p>		
<p><b>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.</b> [Title X, §722 (f) and (g)]</p>		
<p><b>Guiding Questions</b></p>	<p><b>Acceptable SEA Evidence</b></p>	<p><b>Acceptable LEA Evidence</b></p>
<p><u>Questions:</u></p> <ul style="list-style-type: none"> <li>▪ How and from what sources does the State collect information to determine the ongoing needs of homeless students in the State?</li> <li>▪ 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?</li> <li>▪ How does the State coordinator collaborate with other State agency staff to address the needs of homeless children and youth?</li> <li>▪ How do the SEA and State coordinators ensure coordination among SEA programs serving students experiencing homelessness, including Title I, Part A, Title III, special</li> </ul>	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ Updates to the State Plan, including the completion of planned activities and proposals for new State-level activities.</li> <li>▪ 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.</li> <li>▪ Evidence that the SEA coordinates programs and services between the SEA, the State social services agency, and other agencies (including agencies</li> </ul>	<p>N/A</p>

<p>education, early learning services, and at-risk youth programs?</p> <ul style="list-style-type: none"> <li>How does the State coordinator participate in Statewide activities that address the needs of homeless pre-school children and unaccompanied youth?</li> </ul>	<p>providing mental health services), for example schedules, agendas, minutes, notes or handouts from attending such meetings.</p> <ul style="list-style-type: none"> <li>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.</li> </ul>	
<p><b>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)]</b></p>		
<p><b>Guiding Questions</b></p>	<p><b>Acceptable SEA Evidence</b></p>	<p><b>Acceptable LEA Evidence</b></p>
<p><u>Questions:</u></p> <ul style="list-style-type: none"> <li>What ongoing professional development activities does the State coordinator provide to LEAs with and without subgrants about the requirements of McKinney-Vento?</li> <li>How often does the SEA monitor changes in staffing of LEA liaisons?</li> </ul>	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> <li>Copies of written guidance to LEAs and/or information dissemination materials distributed electronically or by other means.</li> <li>The most recent liaison orientation, on-line trainings, conferences, and regional training agendas and</li> </ul>	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> <li>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.</li> </ul>

<p>How does the SEA assist new liaisons with learning their responsibilities for implementing McKinney-Vento?</p> <ul style="list-style-type: none"> <li>▪ What special activities are undertaken on behalf of homeless preschool children and homeless unaccompanied or out-of-school youth?</li> <li>▪ 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?</li> <li>▪ 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?</li> <li>▪ 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)?</li> </ul>	<p>technical assistance log.</p> <ul style="list-style-type: none"> <li>▪ The most recent professional development schedules and agenda, handouts or other sample materials unique to the State.</li> <li>▪ Documents related to activities associated with homeless preschool children, unaccompanied and out-of-school youth.</li> </ul>	<ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ Examples of written notification to parents and youth regarding placement decisions when they are different from what was requested.</li> <li>▪ Evidence that the LEA ensures that transportation to the school of origin is provided upon request and monitored by the LEA.</li> <li>▪ 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.</li> </ul>
<p><b>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]</b></p>		

Guiding Questions	Acceptable SEA Evidence	Acceptable LEA Evidence
<p><u>Questions:</u></p> <ul style="list-style-type: none"> <li>▪ What are the steps the State takes to organize a subgrant competition? How are reviewers chosen and trained?</li> <li>▪ How does the SEA review grants for quality of application as well as local need?</li> <li>▪ 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?</li> <li>▪ What is the SEA’s policy regarding carryover and reallocation of funds?</li> <li>▪ 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?</li> </ul>	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> <li>▪ Evidence the SEA has an application and approval process to provide competitive subgrants to LEAs.</li> <li>▪ Evidence that LEA subgrant applications are reviewed and awarded on a competitive basis for both need <u>and</u> quality of the project proposal.</li> <li>▪ 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.</li> <li>▪ Any other fiscal reporting or oversight of EHCY; for example, quarterly reports, budget amendment requests and approvals, etc.</li> </ul>	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> <li>▪ Evidence the LEA application/plan includes assessment of the needs of homeless students and the supplemental services provided.</li> <li>▪ Evidence that the subgrant expands or improves services provided as part of regular academic program.</li> <li>▪ Written contracts when an LEA subcontracts any of its EHCY activities to a third-party organization.</li> <li>▪ 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.</li> <li>▪ A current list of all personnel (instructional and administrative staff) paid with McKinney-Vento subgrant funds.</li> </ul>
<p><b>3.2: The SEA complies with the statutory and other regulatory requirements governing the reservation of funds for State-level coordination activities.</b> [§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"> <li>▪ How much of the McKinney-Vento EHCY allocation does the SEA reserve for State-level coordination activities and what are those activities?</li> <li>▪ What is the SEA’s policy regarding carryover of these funds?</li> <li>▪ 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?</li> <li>▪ What kinds of Statewide needs assessment and program evaluation is funded through State-level activities or conducted by the State coordinator?</li> </ul>	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> <li>▪ 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.</li> <li>▪ Any other fiscal documents, such as contracts, invoices, etc.</li> <li>▪ Needs assessment or evaluation reports for State-level coordination activities.</li> </ul>	<p>N/A</p>
<p><b>3.3: The SEA has a system for ensuring the prompt resolution of disputes. [§722(g)(C)]</b></p>		
Guiding Questions	Acceptable SEA Evidence	Acceptable LEA Evidence
<p><u>Questions:</u></p> <ul style="list-style-type: none"> <li>▪ How does the State Coordinator ensure that liaisons are aware of the</li> </ul>	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> <li>▪ Updated SEA dispute resolution policy and procedures including:</li> </ul>	<p><u>Documentation:</u></p> <ul style="list-style-type: none"> <li>▪ Written dispute resolution policy.</li> </ul>

**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"> <li>▪ What is the State's process to review or investigate disputes brought by parents/youth?</li> <li>▪ Do all districts have a written district dispute resolution process and track pre-dispute inquiries concerning barriers to enrollment?</li> <li>▪ 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?</li> </ul>	<ul style="list-style-type: none"> <li>➤ procedures for tracking disputes</li> <li>➤ documents indicating that dispute procedures have been implemented</li> <li>➤ records indicating that disputes are addressed, investigated and resolved in a timely manner</li> </ul> <ul style="list-style-type: none"> <li>▪ Evidence that SEA tracks if LEAs have a dispute resolution policy in place.</li> <li>▪ Survey results or records of inquiries and complaints made by community groups concerning barriers to enrollment for students experiencing homelessness.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Evidence that LEA implements a process for the prompt resolution of disputes, such as a phone log, notes, or e-mail messages.</li> <li>▪ Records indicating that enrollment disputes are investigated and resolved in a timely manner.</li> <li>▪ Evidence that students are enrolled and provided transportation during the dispute resolution process.</li> <li>▪ Survey results or records of inquiries and complaints made by community groups concerning barriers to enrollment for students experiencing homelessness.</li> </ul>
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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 programs<sup>1</sup> 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.

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<sup>1</sup> 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.<sup>2</sup>

**Table 2: Monitoring Schedule**

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

<sup>2</sup> 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**

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

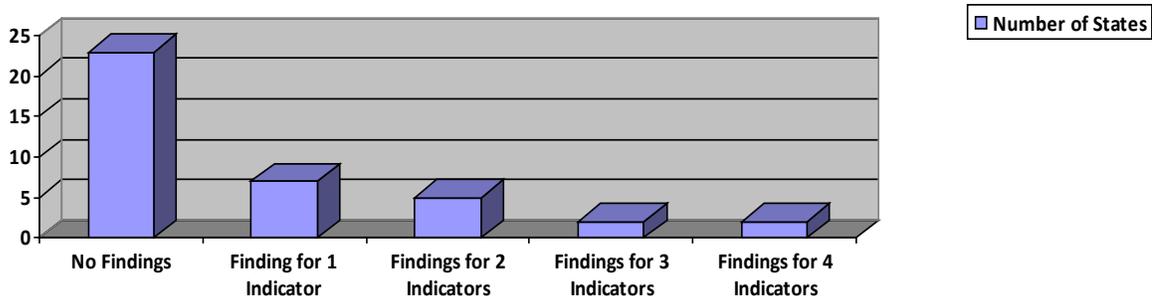
<b>Second Round Monitoring Result</b>	<b>Number of Findings/ Recommendations</b>	<b>Number of States (of 39 monitored) With at Least One Finding or Recommendation in Second Round</b>
Findings	31	15
Recommendations	29	18

### **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

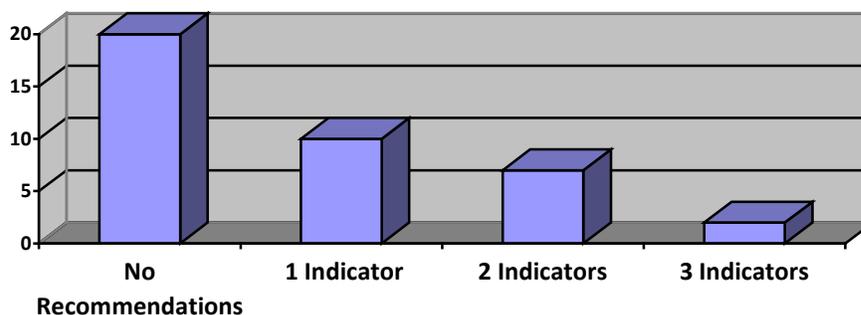


### Summary of Monitoring Recommendations

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.

## Section E. Technical assistance for LEAs

McKinney-Vento requires that every LEA designate a local homeless education liaison.

Section 722(g)(1)(J)(ii) states:

“Local educational agencies will designate an appropriate staff person, who may also be a coordinator for other Federal programs, as a local educational agency liaison for homeless children and youths, to carry out the duties described in paragraph (6)(A)”

You should have an accurate list of local homeless education liaisons and have strategies in place to determine whether liaisons have the knowledge and skills needed to perform the role adequately. This section of the **State Coordinators’ Handbook** will assist state coordinators in ensuring that LEAs receive the support they need to carry out their responsibilities under the McKinney-Vento Act.

### E.1 Overview/ensuring local liaisons in every LEA

State coordinators have identified the appointment of LEA contacts as a best practice in reaching out to local school districts for many years. As cited in the 2006 **Report to the President and Congress On the Implementation of the Education for Homeless Children and Youth Program Under the McKinney-Vento Homeless Assistance Act**, when asked what changes to the EHCY program in 2002 were most transformational, many in the field mentioned the requirement to designate a local liaison. The liaison provides a single point of contact and a vehicle for communicating changes in policy and

*We just used our regular McKinney-Vento policies that we already had. I can’t think of any new policies I’d want, because I think McKinney-Vento really addresses the issues of homelessness. So it really helped out with enrollment without a parent, immunizations, and...transportation. We set up enrollment centers at the Reliant Astrodome. We had all the forms students needed to enroll, and we had the special education people doing ARD [Admission, Review and Dismissal] meetings right on-site, so the kids got to school with a current IEP [Individualized Education Program]. We were looking at graduation requirements to make sure we got high school students in the right classes. As soon as records came, if we needed to adjust, we put them in the right class.*

Quote from Houston Independent School District, Houston, TX. U.S. Department of Education, Office of Elementary and Secondary Education, Student Achievement and School Accountability Programs, Education for Homeless Children and Youth Programs. (2007). *In Their Own Words: Schools and Students Overcoming Adversity*. Washington, D.C. Retrieved 6-28-10 from <http://center.serve.org/nche/downloads/itow.pdf>

practices and for identifying challenges faced at the local level. When Hurricanes Katrina and Rita displaced children across the country in 2005, the McKinney-Vento EHCY structure of state coordinators and local liaisons provided a powerful network of support which was easily tapped to reach children and their families.

Because this network of support and communication is such a critical component, some initial and enduring questions that state coordinators must address include:

- Who are the local homeless liaisons?
- How are changes in local staff reported?
- Where is their contact information maintained?

Keeping an updated and accurate list of local homeless education liaisons will assist you in establishing and maintaining an infrastructure for routine and effective communication and in determining whether all LEA homeless liaisons have the knowledge and skills needed to perform the role adequately. Maintaining effective communication is critical to all aspects of your EHCY program and should be given high priority as you build your EHCY network. Some states have data management systems in place that support the maintenance and quick update of local liaison contact information. If yours does not, it is well worth your while to develop your own database/spreadsheet to keep your list as accurate as possible.

In keeping with the specific legislative requirement, here are a few suggestions to ensure that all LEAs have an appointed liaison:

- Post liaisons and their contact information on your state’s website. This provides a public vehicle that can be accessed by other schools and agencies in your state and as a resource for other state coordinators and their liaisons as children travel across state lines.
- Be sure to update your list at least annually.
- Send a back-to-school packet of materials (posters, family brochures, training announcements, some new resource as a “gift”) to the liaison annually with a request for updated contact information in the cover letter. Remind liaisons that the information is posted on the state’s website.

- If your liaisons are referenced by other programs in their applications, check for consistency. For example, the homeless liaison may be identified in the Title I, Part A application to describe the coordination between McKinney-Vento and Title I. Follow up with any LEAs that indicate different names from the ones in your database to verify that you have accurate information about who is actually managing liaison responsibilities.
- Note any changes that come to your attention as you communicate with the field and update your files as soon as possible.
- LEA monitoring can be a means to ensure that a liaison is appointed. Schedule a phone monitoring with LEAs who have not communicated needed information.

The law requires that the LEA designate an “appropriate staff person.” Only a small percentage of LEAs have full-time staff dedicated to homeless education. The smaller the school district, the more likely it is that the liaison responsibilities will be added to a long list of duties held by one person at the district level. A variety of other roles are often combined with the liaison responsibilities. School social workers, or the supervisor for these personnel, can be a natural fit given the skill of social workers in networking to provide community supports. A federal program administrator, such as a Title I coordinator, also can be a logical connection to provide the coordination across school-based programs. In addition, staff members who work with truancy, collaborate with local community service boards, or early childhood programs have been effective homeless liaisons. It is appropriate to include a question about the appropriateness of the designation in your LEA monitoring. Sometimes when localities review the requirements and monitoring questions, roles are shifted.

Even if localities have full-time liaisons, having only one staff person trained to comply with EHCY can leave gaps in services when liaisons are sick, on vacation, or out of the office fulfilling other roles. Consider opening liaison training to other staff. This can build local capacity and bring more personnel with an interest in homelessness to your attention. As the liaison role is better understood, as local structures and staff change, or as the needs of children in the community change, rethinking who would be an appropriate staff person can occur. How we orient new liaisons (or re-orient) can set the tone for effective state-local collaboration.

## E.2 Orienting local liaisons

Once you know *who* has been designated as liaisons, a logical second group of questions will be, “How do I know that the liaisons understand their responsibilities? How do I ensure that they can fulfill their legal responsibilities?” Just as there is a lot of information to wade through as a new state coordinator, liaisons are confronted with an expanse of resources that could be overwhelming without a guiding hand. Consider these actions:

- Create a generic “welcome” packet for new liaisons that includes:
  - Contact information for the state coordinator, including state website
  - Checklist of liaison responsibilities. These responsibilities are mentioned specifically in the law, and are described in the [\*\*NCHE Local Homeless Education Liaison Toolkit.\*\*](#)
  - Schedule of upcoming trainings (state conferences, national conferences and webinars)
  - Suggested training resources. NCHE offers self-paced, online, and recorded trainings. For liaisons who are unfamiliar with McKinney-Vento, recommend the NCHE Webinar, [McKinney-Vento 101](#) as a primer.
  - Copy of The McKinney-Vento Homeless Assistance Act, Subtitle B of title VII. (Use the formatted version found in Appendix A of **NCHE’s Toolkit for Local Homeless Education Liaisons**. When providing technical assistance, using the *Toolkit* version allows the state coordinator to direct the liaison to a certain page in the law that is easier to locate than a legal section citation.)
  - Copy of any state code/policy related to homeless education
  - Contact list of liaisons throughout the state
  - Template of important contacts in the state and locality the liaison should have (see Appendix E-1 for a sample)
  - Copy of current monitoring protocol
- Design a McKinney-Vento Scavenger Hunt for new liaisons, encouraging them to contact you when items cannot be found. Some good items to include:
  - Local homeless education policy

- Title I, Part A description of coordination with McKinney-Vento, including reservation of funds
- Processes for identifying students as homeless, immediately enrolling students, ensuring free meals at school, obtaining school of origin transportation
- McKinney-Vento subgrant application (if applicable)
- Local Homeless Education Liaison Toolkit or any state-developed resources you provide to your liaisons.
- NCHE family brochures
- The “Top Five” list, such as the one created by Colorado’s state coordinator for local liaisons. See Appendix E-2 for a blank template and the Colorado sample.

### **E.3 Creating a network of support for local liaisons**

State coordinators can create a variety of supports available for local liaisons. Here a few to consider:

- Support regional liaison collaboration. Issues such as inter-district transportation or unaccompanied homeless youth can be the impetus for a regional meeting that can evolve into a regular opportunity to meet, share challenges, and brainstorm solutions.
- Identify “senior” liaisons that can field questions or provide training when the state coordinator is not available.
- Appoint a mentor to new liaisons.
- Connect liaisons with any outsourced technical assistance to another agency, intermediate education units, or universities that work with the state coordinator.
- Consider having a state-level listserv for liaisons.
- Create an email list of all local liaisons so you can forward important information quickly.

### **E.4 Conducting professional development (tools and resources)**

Legislative requirements for state coordinators [Section 722(f)] include the provision of technical assistance to local education agencies to ensure their compliance with the requirements of Section 722(e)(3) and paragraphs (3) through (7) of subsection (g). The recent

federal monitoring indicator 2.2 for the McKinney-Vento program addresses this requirement specifically, requiring documentation/evidence of activities such as:

- Providing ongoing technical assistance to LEAs to ensure appropriate implementation of the statute
- Monitoring changes in staffing of LEA Liaisons
- Assisting new liaisons in learning their new responsibilities
- Providing training and technical assistance to LEAs to ensure that community agencies are aware of the rights of homeless students

#### **E.4.1 Identification of technical assistance needs of LEAs and liaisons**

Ensuring LEA compliance with the statutory requirements of McKinney-Vento requires an assessment of LEA capacity and a plan for addressing areas of concern. A useful first step in planning and delivery of technical assistance to LEAs is to analyze any available needs assessment efforts already initiated. As more importance is placed on data-based decision making, and as ED strengthens accountability measures relative to the prudent use of federal funds, it becomes more imperative that a focus on the collection of needs assessment and program evaluation data is given high priority. NCHE has published [\*Educating Homeless Children and Youth: Conducting Needs Assessments and Evaluating Services - A Guide for SEAs, LEAs, and Local Schools\*](#) to support needs assessment and program evaluation in building EHCY programs. State coordinators are finding this Guide to be useful, not only in collecting state level data, but also in assisting LEAs to collect data needed to inform program decisions at the local level. ED suggests that needs assessments should be updated annually, while subgrantee LEAs need to do this more comprehensively at least once every three years. Important decisions about programming and resources (e.g., the determination and use of Title I, Part A funds for homeless students) should also be based on systematic collection of accurate data.

Needs assessments are conducted in many similar fields of education and social services for homeless children and youth and there are many ways to conduct one. The LEA Needs Assessment Worksheets and Summaries from the Guide can provide the state coordinator with

critical information about common and unique needs that should be addressed through local liaison training and technical assistance. Once the needs assessment process is completed and results are analyzed, a plan of action to deliver technical assistance can be customized to benefit the local liaison, the LEA, and the broader homeless community network. For state coordinators and local liaisons with severely limited time due to multiple roles, the Guide describes strategies to make the process manageable without compromising the value of needs assessment and program evaluation efforts.

Additional strategies to determine LEA needs for technical assistance include review of any available monitoring reports, end of year subgrant reports, CSPR data, and technical assistance logs maintained by the state coordinator. (See Appendix E-3 for sample forms.) Here are some questions to consider as you analyze the technical assistance needs of liaisons:

1. Is the LEA identifying appropriate numbers of homeless children and youth? Do the numbers appear to be aligned with poverty data, number of students eligible for free/reduced meals, size of Title I, Part A allocation, number of students identified as homeless in previous years, nearby localities, and reported by other agencies? Are these data available to you through Title I or other programs?
2. Are there any identified (or emerging) compliance issues apparent in technical assistance logs and monitoring reports?
3. Has there been significant turnover among homeless education staff?

Here are some strategies to consider as you develop plans to meet those needs:

1. Develop strong relationships with local liaisons built on mutual trust.
2. Monitor the amount of liaison time allocated to McKinney-Vento responsibilities. For example, homeless liaisons assigned to multiple programs might have diminished capacity relative to EHCY and need additional supports to carry out their responsibilities. Be prepared to communicate with supervisors if there are capacity concerns related to compliance or program quality issues.
3. Consider whether the liaison position has the authority needed to effect change, and again, whether communication with the supervisor would be supportive.

4. Develop a packet of information to be shared with superintendents, and/or other program administrators to clarify the responsibilities of the liaison.
5. Conduct a quick survey of basic information from each LEA demonstrating that someone is addressing all requirements; require the signature of the person held accountable.
6. Make LEA needs assessment mandatory; analyze results to determine gaps.
7. Get to know local issues; look for patterns across regions; provide technical assistance to groups with common needs.
8. Review Consolidated or Title I, Part A Plans – determine whether updates or revisions are needed regarding the planning for a strong EHCY program.
9. Use a state map of LEAs, to analyze identification results with reference looking at potential indicators, such as:
  - a. Number of homeless students identified relative to surrounding districts
  - b. Economic indicators relative to surrounding districts
  - c. Number of homeless students identified relative to the size of Title I allocations (how many districts with large Title I allocations are reporting low numbers?)
  - d. Economic indicators (e.g., poverty data, foreclosures, etc.)
  - e. Number and location of homeless shelters
10. Use mentoring or buddy assignments to pair needy liaisons with knowledgeable mentor liaisons.
11. Provide targeted technical assistance to struggling LEAs through site-visits when necessary; follow up communications should be routine and systematic until pressing issues are resolved, or significant improvement has been achieved.

#### **E.4.2 Provision of training for LEAs and liaisons**

In planning LEA training, it is helpful to organize the content according to (1) what is necessary for compliance, (2) what a quality program that goes beyond compliance looks like, and (3) what characteristics define a robust, mature, model homeless education program. The overall plan should include several different models, depending on the target audience and identified needs. Some suggested models include:

- Training for all liaisons – what everyone needs to know
- Training for non-grantee liaisons, especially targeting those with less experience and/or emerging understanding of the statutory requirements of the McKinney-Vento Act
- Training modules for other school and agency personnel that is role specific
- Issue-focused training for specific issues, problems, situations
- Advanced training for experienced liaisons
- Multi-program training opportunities, such as state or federal homeless conferences or other seminars that include homeless education issues

When determining topics for training, use the following questions as you make decisions about content:

- How many liaisons have already received basic McKinney-Vento training?
- Are there updates from the national homeless network, state homeless education program, or other programs or agencies that need to be provided?
- If you survey local liaisons, what topics do they identify as needs for training?
- Are experienced liaisons willing to share their expertise in a training event?
- Would sharing model programs or best and promising practices be helpful?

With a firm handle on the content of training needed, you are ready to begin planning for the most effective delivery of training. A wide variety of formats and venues should be considered as decisions are made regarding delivery methods.

- Written briefs, newsletters, memos, emails and other written communication can provide the basic legislative requirements of McKinney-Vento.
- Webinars and other distance learning vehicles are increasing in popularity, especially as travel restrictions, or challenges related to climate/geography limit on-site training opportunities.
  - NCHIE offers frequent webinars. Liaisons can register [here](#).
  - NCHIE can assist state coordinators in customizing a webinar for a specific state.

- Conference calls provide an excellent venue to communicate important but briefer information to a large number or wide geographic area at one time.
- Online Professional Learning Communities (PLCs) are an emerging structure that allows liaisons separated by physical distance to learn together.
- Liaison workshops can be held in a variety of ways
  - Regional meetings with LEAs clustered geographically
  - Compliance meetings with LEAs clustered according to issues or identified needs
  - Single LEA teams to allow intensive work with team of people representing several different role groups within LEA
  - Trainings linked to other program meetings or trainings
- Conferences
  - State homeless education conference
  - Pre-conference workshop targeting a specific group (regional cluster, or needs/issue based)
  - Homeless liaison strand at state Title I conference
  - NAEHCY Conference – plan ahead to convene a meeting of liaisons from your state who are attending
  - Coordinate with other programs and agencies holding conferences; ask to be included on the agenda

Keep in mind that developing LEA expertise does not have to be a one-person show. Many states have developed ways of sharing the responsibility. Some states are building a regional infrastructure to strengthen statewide implementation of homeless programs, with subgrant funds or state level activity funds allocated to “lead” LEAs who share some of the training and technical assistance responsibilities with the office of the state coordinator. Some state coordinators have identified experienced local liaisons to assist with training and mentoring of other liaisons, following a train-the-trainer model. These same experienced liaisons/mentors often are asked to make presentations at state and/or regional conferences, workshops, compliance meetings, etc. To the extent that SEA support is provided in adequate

measure, these regional strategies can lead to productive partnerships in the development of local expertise that builds strong programs.

Regardless of the delivery method, systematic follow up is the key to determining the effectiveness of your training efforts, and to the maintenance and generalization of new knowledge and skills. Successful state programs approach training as an ongoing process, not an event. The ongoing nature of the process is supported by a systematic follow up through routine communication with liaisons. These communications can be casual or formal, via phone, email, or conference call, and can serve as important segments of a desk review component of your monitoring process.

Some examples of follow up communications include: (1) quick surveys of changes that have occurred since training; (2) conference calls discussing challenges related to training topics; (3) discussion of local policies/regulations that remain barriers to the education of homeless students; and (4) electronic bulletin board, or listserv for sharing success stories.

Despite thoughtful planning and preparation, the provision of training and technical assistance to local liaisons is likely to have its challenges. Click here for *Appendix E-4, Potential Pitfalls and Possible Solutions for Liaison Training*.

### **E.4.3 More on professional development**

The importance of understanding effective professional development for adult learners cannot be overstated. Much has been written about effective professional development for teachers, and while some concepts do not translate easily to the administrative perspective needed when supporting liaisons, many key considerations are applicable. The National Staff Development Council (NSDC) is the largest non-profit professional association committed to ensuring success for all students through staff development and school improvement.

Resources can be found at <http://www.nsd.org>.

The following eight questions, originally proposed by Marijane Suttor<sup>1</sup> in relation to

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<sup>1</sup> Suttor, M. Effective professional development. Retrieved on April 18, 2010 from <http://www.helium.com/items/1158158-professional-development-for-schools?>

professional development for teachers, have been adjusted to refer to homeless liaisons. These questions will help you determine if your plan will produce effective professional development:

1. Does it further LEA or school goals and objectives? Look for ways to demonstrate that the information you are providing is aligned with other state and local initiatives.  
Homeless education does not operate in a vacuum. Make connections between the work of liaisons and student achievement, attendance and truancy, healthy schools, etc.
2. Is it something that the liaison can use? Liaisons often wear multiple hats; even when liaisons' time is dedicated solely to McKinney-Vento, the needs outpace the time. In other words, be sure there is a usable "take away" from any professional development activity offered. Ask yourself, "If I were a liaison, what would I do with this information tomorrow?"
3. Do liaisons have input? Adults need input in designing professional development choices. These are the people that are in the trenches; they are the ones that know what is genuinely useful. Do not leave liaisons out of the planning aspect of professional development. The voice of liaisons in identifying critical challenges and emerging trends at the local level can be tapped if you use an advisory board to guide your EHCY program planning.

To meet the needs of adult learners, structure sessions to have a variety of activities. Periods of lecture should be followed with questions and answers, and there should be opportunities for individual and small group work and reflection.

Have real-life scenarios available for problem solving activities. Collect your technical assistance requests to create mini-case studies that can be discussed with small groups and build sessions around frequently asked questions. Allow seasoned liaisons to describe their programs and approaches to resolving challenges. This is an interactive way to review basic content and legislative requirements and model decision-making and problem-solving strategies that can be applied to novel situations liaisons may encounter. (Don't just give the liaison a fish; teach him how to catch fish.)

4. Do liaisons have choices? There is no one "right" way to learn. Providing liaisons with a menu of options is more likely to meet the individual needs of liaisons than a "one-size-

fits-all” approach to professional development. If possible, target state-level McKinney-Vento funds that can be used to reimburse liaisons who pursue professional development to cover travel and other expenses. Reimbursement or honorariums could be tied to giving back through a workshop, conference presentation, webinar, or newsletter article to be shared with other liaisons.

5. Will there be buy-in? State coordinators are required to offer technical assistance and training; however, the local liaison does not have a similar mandate to attend training. LEA monitoring provides state coordinators with a vehicle to ask questions about training in which the liaison has participated and McKinney-Vento subgrantees can be required to participate in certain activities offered by the state coordinator. Generating staff buy-in is the only way to have effective professional development. Liaisons must see a connection between the skills and knowledge provided in professional development, their responsibilities, and the effect fulfilling such responsibilities has on students. Incorporate a variety of messages in your professional development. Some people want to know, “What does the law say I have to do?” Others want to know, “Why will this make a difference for the children I serve?” Still others may want to know, “How can I ‘sell’ this message in my community?” Whether the motivation is heart, head, or bottom line, include something for everyone. Have poignant stories, be able to offer assistance for compliance and continual program improvement, have facts and figures to support your suggestions and challenge common misconceptions.
6. Is time given for liaisons to implement the professional development? Provide or request that liaisons bring their local data to training. This will require additional pre-planning, but offers a more personalized way to approach the information you are discussing. If liaisons recognize the professional development as a tool that helps them do their work, impact is more likely.
7. Is there follow up and accountability? “One shot” professional development can be ineffective if there is no follow-up. It is a dead end. Annual reports for subgrantees and local homeless education program monitoring are logical accountability measures. It is OK to assign “homework” as long as it is meaningful. Consider a menu of options that

could include sharing updates with a partner in the training or sending updates on issues via listserv or newsletter. Ongoing professional development can be nurtured by follow up conference calls after a workshop, webinars, videoconferencing, blogs, or other electronic communication.

8. Is there an evaluation? Professional development must include evaluation to determine how effective it was and how well liaisons are incorporating the training. Surveys should be conducted and there should be a plan to evaluate whether it is a successful program. Evaluating professional development should be an ongoing practice.

#### **E.4.4 Some final thoughts**

The task of providing training and technical assistance across an entire state, whether small or large, can be a daunting task. It is important to recall that the information being communicated is critical to assist local school districts in compliance with the McKinney-Vento Act and to ensure that our ultimate goal, supporting children and youth who are experiencing homelessness to access and to succeed in school, is achieved. Face-to-face opportunities to share successes and challenges can personalize the process and allow for two-way communication. The state coordinator can gain insights from presentations to local personnel, and local personnel need opportunities to clarify confusing issues.

Depending on the state, a state coordinator may want to consider a train-the-trainer model and work with veteran local homeless education contacts to train other local liaisons regionally to limit travel expenses. Regardless of methods of delivery, many training materials are available on the NCHE website, which houses a variety of documents describing best and promising practices, and most notably offers a collection of training tools developed by veteran state coordinators, your peers. Some state coordinators invite NCHE staff and other national partners to present at state trainings. Click here for Appendix E-5, *Quick Tips for Presenters*, a helpful resource for training of presenters.

#### **E.5 Developing a homeless education website**

With the nearly universal access to the Internet among LEAs, state homeless education websites have become an essential repository of information about a state's homeless

education program, as well as a portal to link to a myriad of additional information and resources. NCHE's 2010 survey of state coordinators indicated that 94 per cent of state coordinators (35 respondents) use a homeless education website frequently to communicate with local liaisons.

Most state homeless education websites include at a minimum:

- Contact information for the state coordinator for homeless education
- A list of homeless education liaisons and their contact information
- A list of subgrantees and coordinator contact information
- An overview of the McKinney-Vento Act and a link to the actual law
- Homeless education state policies, including the dispute resolution policy
- Announcements of trainings and events
- A link to NCHE

In addition, many states include:

- Guidance and policy memos and updates
- Clarifying documents and briefs from NCHE and NAEHCY, including [NCHE's briefs](#), NCHE's [Toolkit for Local Homeless Education Liaisons](#), and NAEHCY's [Frequently Asked Questions](#).
- Links to national organizations, such as [NAEHCY](#), [National Law Center on Homelessness & Poverty](#), [National Alliance to End Homelessness](#), [National Network for Youth](#)
- State publications and resources related to homeless education
- Forms that LEAs may use, such as those for enrollment and notification of rights
- Good practices that feature specific LEAs
- Links to posters and awareness materials
- Helpline or hotline information

State coordinators should work with their SEA's web designer to ensure that proposed information aligns with the SEA's policies and content requirements and reflects good design principles. Moreover, state coordinators must take into account the level of effort they will be able to provide to keep the website current and the frequency with which they will be able to

update the site. Even a simple website can be very effective as long as it is targeted to specific needs, easy to navigate, and up to date.

The state coordinator should consider who the target audiences are for the homeless education website. A website that is a tool specifically for local liaisons would be significantly different from a website geared for a wider audience, such as homeless service providers and parents.

Periodically conducting an external review of the homeless education website will provide valuable feedback on its effectiveness and utility. In annual reviews of its website, NCHC has utilized the following statements rated on a Likert scale in an online survey of a sample of its constituents:

- The organization of the website is very logical.
- Navigability of the website is very efficient.
- The content provided on the website is of high quality.
- The information posted to the website addresses current issues in the field.
- The website is comprehensive enough to meet my needs.

State coordinators may view state homeless education websites from across the country on the NCHC website at [http://center.serve.org/nche/states/state\\_resources.php](http://center.serve.org/nche/states/state_resources.php). Clicking on any state on the map posted at this site will lead to a page that includes a link to each state's homeless education website.

## **E.6 Ensuring good data collection from LEAs**

Increasingly, data on homeless students serves as a foundation for critical programmatic and budget decisions at the local and state level. Quality data provides an accurate picture of the needs of homeless children and youth and the effectiveness of the McKinney-Vento program. Therefore, state coordinators should provide information and support to ensure that the data collected in LEAs are comprehensive and accurate. As discussed earlier in this section, collecting comprehensive needs assessment data should be an ongoing effort, with annual analysis of relevant data.

Local liaisons cite many challenges in collecting data on homeless students:

- Lack of time
- Not knowing what data are required far enough in advance
- Lack of understanding of how data is input
- Lack of understanding of the terms
- Lack of coordination with district data staff
- Lack of oversight of school staff collecting data

At the state level, state coordinators should work with data CSPR and EDFacts coordinators to help them understand the federal data collection requirements for homeless education and understand the challenges LEAs face in collecting data on highly mobile and homeless students. If a cooperative relationship exists at the state level, data managers can adjust the statewide data collection system to help LEAs meet these challenges as well as train local data managers.

State coordinators should help LEAs understand the importance of data by enabling them to view their data and assisting them with using it to understand their program. State coordinators should also hold LEAs accountable for collecting data by including a monitoring indicator specific to data collection.

Many state coordinators include the topic of data collection in their LEA trainings and include LEA data managers in the trainings as well. Not only do the local liaisons and data managers learn the same information, but they have an opportunity to interact with one another and create a basis for collaboration.

As mentioned in Section C of this **Handbook**, a useful resource for supporting LEAs in their federal data collection for homeless students is NCHE's [\*Federal Data Collection Guide for the Education of Homeless Children and Youths Program\*](#). This guide, updated annually, includes an overview of the EDFacts and CSPR systems, general instructions and specific instructions for each question, and a glossary that clarifies terms used in the data collection questions.

State coordinators will find Appendix D in the data collection guide particularly helpful. Appendix D is a compilation of tips that state coordinators have used to assist their LEAs with federal data collection.

State coordinators should encourage LEAs to go above and beyond federal requirements for data collection to assess needs of and services for homeless students. The benefits of using data to identify gaps in services and to support requests for funding cannot be underestimated. The aforementioned NCHE publication, [\*Educating Homeless Children and Youth: Conducting Needs Assessments and Evaluating Services - A Guide for SEAs, LEAs, and Local Schools\*](#) will be a valuable tool to assist LEAs in moving their programs beyond compliance, to quality EHCY program implementation.

### **E.7 Developing statewide forms**

Developing state forms for LEAs to use creates consistency among the LEAs and sets expectations for record keeping and documentation. Some of the more commonly used state forms include enrollment or student residency forms, written notification of enrollment decision for parents, and forms for documenting issues as they arise as barriers to identification and enrollment (barrier tracking forms). The *Toolkit for Local Homeless Liaisons* includes sample forms that can be adapted for use by all LEAs. Appendix D in the *Toolkit* includes enrollment forms ([http://center.serve.org/nche/downloads/toolkit/app\\_d.pdf](http://center.serve.org/nche/downloads/toolkit/app_d.pdf)); Appendix E includes assessment and data collection tools ([http://center.serve.org/nche/downloads/toolkit/app\\_e.pdf](http://center.serve.org/nche/downloads/toolkit/app_e.pdf)); and Appendix G includes a school level point of contact form ([http://center.serve.org/nche/downloads/toolkit/app\\_g.pdf](http://center.serve.org/nche/downloads/toolkit/app_g.pdf))

In addition, the state and local resources page on the NCHE website (<http://center.serve.org/nche/forum/forum.php>) includes forms that state coordinators agreed to have posted so that others may use or adapt them for their state's needs.

### **E.8 Links to helpful documents**

Clarifying documents and briefs from NCHE and NAEHCY, including NCHE's briefs <http://center.serve.org/nche/pr/briefs.php>

NCHE's *Toolkit for Local Homeless Education Liaisons*  
[http://center.serve.org/nche/pr/liaison\\_toolkit.php](http://center.serve.org/nche/pr/liaison_toolkit.php)

NAEHCY's Frequently Asked Questions <http://www.naehcy.org/dl/faq.pdf>

Appendix D of the data collection guide, a compilation of tips that State Coordinators have used to assist their LEAs with federal data collection.

[http://center.serve.org/nche/downloads/data\\_guide\\_08-09.pdf](http://center.serve.org/nche/downloads/data_guide_08-09.pdf)

The National Staff Development Council (NSDC), a non-profit professional association committed to ensuring success for all students through staff development and school improvement. <http://www.nsd.org>.

Homeless education websites from other states on the NCHE website

[http://center.serve.org/nche/states/state\\_resources.php](http://center.serve.org/nche/states/state_resources.php)

### Appendix E-1. Template for Local Homeless Liaisons' Important Contacts

Contact	Phone; E-mail; Web site	Type of support
State Coordinator		
NCHE helpline	<b>1-800-308-2145 (toll-free) or</b> <a href="mailto:homeless@serve.org">homeless@serve.org</a>	Technical assistance
NCHE listserv	<a href="http://center.serve.org/nche/listserv.php">http://center.serve.org/nche/listserv.php</a>	Requesting and sharing information
NAEHCY	<a href="http://www.naehcy.org">http://www.naehcy.org</a>	work occurring in other states, legislative updates, conference opportunities
Local		
Title I		
School Nutrition		
Transportation		
Special Education (including Child Find)		
Truancy		
Enrollment		
Preschool (including Head Start and Early Childhood Special Education)		
HUD Local Continuum of Care		
Local Shelters		
Homeless Coalition Partners		
Housing Coalition Partners		
Child Welfare Agencies		
United Way		
Salvation Army		

# Top 5 of Title X

## 5 DOCUMENTS TO READ:

- 1.
- 2.
- 3.
- 4.
- 5.

## 5 HANDOUTS TO DISTRIBUTE:

- 1.
- 2.
- 3.
- 4.
- 5.

## 5 PEOPLE TO KNOW IN YOUR DISTRICT:

- 1.
- 2.
- 3.
- 4.
- 5.

## 5 AUDIENCES FOR TRAINING:

- 1.
- 2.
- 3.
- 4.
- 5.

## 5 RESOURCES TO UTILIZE:

- 1.
- 2.
- 3.
- 4.
- 5.

## 5 ACTION STEPS AFTER THIS TRAINING:

- 1.
- 2.
- 3.
- 4.
- 5.

# Top 5 of Title X

## 5 DOCUMENTS TO READ:

1. Local Liaison Toolkit
2. Intro to Homelessness Brief
3. Determining Eligibility Document
4. 100 FAQs of McKinney-Vento
5. Unaccompanied Youth Brief

## 5 RESOURCES TO UTILIZE:

1. Colorado Department of Education
2. Other Liaisons
3. National Center for Homeless Educ.(NCHE)
4. National Association for the Education of Homeless Children and Youth (NAEHCY)
5. College Invest (for CO's Higher Educ. Single Points of Contact for Unaccompanied Youth)

## 5 HANDOUTS TO DISTRIBUTE:

1. Enrollment Cards/Forms
2. Brochures/Posters/Flyers
3. Homeless Rights Handout
4. Resource Cards
5. School Toolkits

## 5 PEOPLE TO KNOW IN YOUR DISTRICT:

1. Title I Coordinator
2. Director of Transportation
3. Head of Enrollment
4. Head of Nutrition Services
5. October Count and Other Data People

## 5 (+ 1) AUDIENCES FOR TRAINING:

1. Secretaries/Registrars/Enrollment Staff
2. Title I Staff
3. Principals, Superintendents and other Administrators
4. Social Workers and School counselors
5. Teachers
6. Nurses

## 5 ACTION STEPS AFTER THIS TRAINING:

1. Develop an Enrollment Form (be sure it includes data collection for unaccompanied youth)
2. Create a Training Schedule with Target Audiences (It is often helpful to have a first tier and second tier training schedule)
3. Make an appointment with your Title I Coordinator (discuss your District's Title I plan to serve homeless students and the level of reserved homeless set-asides)
4. Meet with your Data tracking folks
5. Hang posters in all school sites and community venue

**Appendix E-3. Sample Technical Assistance Logs**

<b>Date</b>		<b>Summary of Discussion</b>	<b>Follow up?</b>
<b>To/From</b>			
<b>Phone #</b>			
<b>Division/ Program</b>			
<b>Issue</b>			
<b>Summary of Assistance/ Materials Provided</b>			
<b>Date</b>		<b>Summary of Discussion</b>	<b>Follow up?</b>
<b>To/From</b>			
<b>Phone #</b>			
<b>Division/ Program</b>			
<b>Issue</b>			
<b>Summary of Assistance/ Materials Provided</b>			

Caller		City/ Region	
Phone #		Division	
Title/Role		Date Resolved	
Date			

	General Information
	Enrollment
	Access to Services
	Collab./Resources/Referrals
	assistance for another state
	national level assistance
	budget/project activities
	proposal preparation
	other fiscal questions
	LEA responsibilities
	local policies
	data collection
	definition of homeless
	identification
	duration of homelessness
	verify homeless/eligibility
	residency
	physical/immunizations
	guardianship
	school records
	immigration
	previous expulsion
	school of origin (SOO)
	poor attendance/misbehavior
	transportation

	M-V Subgrantees
	ARRA
	NAEHCY
	LeTendre
	foreclosure
	Research questions
	preschool
	unaccompanied youth
	foster care
	immigration
	special education/eligibility
	Title I and other federal programs
	nutrition services
	med/dent/health referrals
	mentoring
	school supplies/clothing
	tutoring
	summer school
	family violence-safety
	community-school communication
	housing support referral
	HOPE Publications/resources
	statistics/history/background
	training-regional requests/seminar
	written notification
	dispute resolution procedure

**Details & Assistance, Materials, Guidance, Referrals Provided**

Follow up

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#### Appendix E-4. Potential Pitfalls and Possible Solutions for Liaison Training

Potential Pitfalls	Possible Solutions
Resistant liaisons who see their new responsibilities as a burden	<ul style="list-style-type: none"> <li>– Maintain a focus on the student—most educators choose the field because they want to improve the lives of children.</li> <li>– Acknowledge the challenges while highlighting how compliance has the potential to improve educational experiences for all children.</li> </ul>
Liaisons with no background in homelessness	<ul style="list-style-type: none"> <li>– Include cases studies and awareness-building activities to build context.</li> <li>– Pair “seasoned” and new liaisons during training.</li> <li>– Consider separate trainings for liaisons with varying experience.</li> <li>– Differentiate group activities based on levels of experience.</li> </ul>
Limited staff capacity at LEA; % FTE allocated to liaison position is not adequate	<ul style="list-style-type: none"> <li>– Consider letter or other communication with liaison’s supervisor/program director outlining LEA responsibilities, and the importance of compliance with McKinney-Vento and Title I requirements</li> <li>– Ask that the supervisor be present for local monitoring visits, and/or other site visits to LEA.</li> <li>– Include capacity requirement in applications for McKinney-Vento or other grants awarded by SEA.</li> </ul>
Low attendance at trainings	<ul style="list-style-type: none"> <li>– Explore possibility of assigning certification/relicensure points for participation.</li> <li>– Analyze convenience of times and locations.</li> <li>– “Piggy-back” with other training/conference events that attract the needed audience.</li> <li>– Explore possibility of making training attendance a state-level requirement.</li> <li>– Call the meetings mandatory compliance meetings.</li> <li>– Hold regional meetings so that LLs don’t have far to travel; host webinars for the same reason.</li> </ul>
Training sessions that tend to get derailed by discussion of individual problems and/or worst case scenarios	<ul style="list-style-type: none"> <li>– Maintain a “parking lot” flipchart page of issues that can be discussed later, if time allows or addressed through subsequent mailings/trainings.</li> <li>– Remind participants that “worst case scenarios” are infrequent and redirect to most common situations as quickly as possible. (Seasoned liaisons who can support such comments are extremely helpful here.)</li> <li>– Invite problematic participants to discuss the issue with you later.</li> </ul>

## Appendix E-5. Quick Tips for Presenters

### Power of 3: Getting the Point Across

Many practiced public speakers ranging from pastors to politicians repeat important points three times. They introduce the points in the opening, elaborate on each during the presentation, and summarize each in the closing statements.

### Time Use

Think of the presentation time being divided into three parts: an introduction, explanation/interaction, and wrap-up. In general, 25% of the time is spent on the introduction, 25% on the wrap-up, and 50% of the time on the explanation.

### Handouts

- People read handouts when they get them, so give time to look over the materials before launching into your presentation or immediately asking participants to look for or do something in the handout.
- Assure participants that information on the slides is included in the handouts so they will not have to spend time during the presentation taking lots of notes.

### Participant Involvement

A quick activity, demonstration of technique, or non-threatening question can enhance audience participation.

### Slide Presentation

Prepare slides that all participants can see by:

- Using a plain font (such as Times Roman, Helvetica, or Arial)
- Selecting a large font size (18 point or larger)
- Including no more than 8 lines of text per slide

### Movement

Limit your movement when speaking. Some participants may be very distracted if you “talk with your hands” or play with items in your pockets.

### Information

- If referencing a book, know the title, author, and ISBN number—people always ask.
- Provide contact data: phone number, e-mail address, or mailing address.

### Adult Learners

Adult learners are different from students in K–12 classrooms.

Adult learners are responsible for their own learning, and they seek ways to fill that need.

Adult learners are involved in workshops for a variety of reasons such as:

- Professional benefit
- Benefits to their students
- Mandatory attendance requirement
- Personal interest

Adult learners are professionals in their field and can benefit from both the presentation and the opportunity to interact with colleagues.

Participants like to leave knowing how they can affect positive change. One way to do this is to offer participants something that they can try immediately when they get back to school. It should be fairly easy to implement with few, if any, materials needed.

## **Section F. The McKinney-Vento Subgrant Process**

Each year, the SEA must make subgrants to LEAs for the purpose of facilitating the enrollment, attendance, and success in school of homeless children and youth. These subgrants are competitive, awarded on the basis of need and quality of the application. Included in this section is a review of the requirements of the subgrant program described in Section 723 of the McKinney-Vento Act. Additionally, this section summarizes many years of good practice on the part of states that can guide both new and experienced state coordinators through a process of reviewing their program's current subgrant process against accepted good practice and enable them to make refinements as necessary.

An LEA's McKinney-Vento program is likely to be only as good as the process by which subgrants are awarded. As the state coordinator, you play a vital role in developing a process that enables subgrantees to link needs, goals, activities, and expenses and holds subgrantees accountable for implementing strong programs. This section includes discussions of appropriate lengths for the subgrant cycle, the size and number of awards, strategies for conducting the process and making awards, and subgrant oversight. An additional web link is provided to the NCHE Forum that features sample McKinney-Vento subgrant applications and other documents that states have shared, such as proposal review rubrics and training materials to prepare LEAs for the subgrant process.

### **F.1 Requirements in the McKinney-Vento Act related to subgrants**

Section 723 of the McKinney-Vento Act details the intent and requirements for the McKinney-Vento subgrant program. Following is a summary of the main provisions. Each year, the SEA must award subgrants to LEAs for the purpose of facilitating the enrollment, attendance, and success in school of homeless children and youth. While awards should be finalized annually, states have the option to extend the award cycle for up to three years. The full competitive process and identification of LEAs to fund can be done once every two or three years with confirmation of annual funding made on a yearly basis.

Subgrants are designed to expand or improve upon educational services that a school district provides to all students. The services may be provided through programs on school

grounds or other facilities, and should be provided through existing programs that integrate homeless children and youth with nonhomeless children and youth as much as possible.

If services are provided on school grounds, recipients of services may include other children and youth who are at risk of failing in or dropping out of school. However, the main purpose of the subgrant is to meet the needs of homeless children and youth. In addition, services provided through the subgrants in schools should not segregate homeless children and youth except for short periods of time when addressing health or safety emergencies or providing temporary, special, and supplementary services to meet the unique needs of homeless children and youth.

LEAs must submit an application to the SEA for a subgrant that includes the following:

1. An assessment of the educational and related needs of homeless children and youth
2. A description of services and programs
3. An assurance that the LEA's combined fiscal effort per student, or aggregate expenditure of the LEA and State with respect to the provision of free public education by the agency for the fiscal year preceding the fiscal year for which the determination is made, was not less than 90 percent combined fiscal effort or aggregate expenditures for the second fiscal year preceding the fiscal year for which the determination is made
4. An assurance that the applicant complies with, or will use requested funds to comply with, the Act
5. A description of policies and procedures to ensure that activities will not isolate or stigmatize homeless children and youth

The SEA must make competitive subgrants to LEAs. Subgrants are awarded on the basis of need and quality of the application submitted. The application must include data on homeless children and youth. The SEA also may require the application to address the extent to which the proposed use of funds will facilitate the enrollment, retention, and educational success of homeless children and youth; coordinate with other programs and agencies; and demonstrate a commitment to serving homeless children and youth.

In determining the quality of the application, the SEA must consider the following:

1. The applicant's needs assessment and the likelihood that the proposed program will meet the needs of homeless children and youth in the LEA
2. The types, intensity, and coordination of the services to be provided
3. The involvement of parents or guardians of homeless children and youth
4. The extent to which homeless children and youth will be integrated into the regular education program
5. The quality of the applicant's evaluation plan for the program
6. The extent to which services provided by the subgrant will be coordinated with other services
7. Other measures the SEA considers indicative of high-quality programming

The law includes a list of authorized LEA activities that may be funded to carry out the purpose of the subgrant program. [Click here to review Appendix F-1, McKinney-Vento Act Section 723, Allowable Use of Funds.](#) [Click here for a further explanation of allowable uses of funds in Section G: Fiscal Oversight.](#)

## **F.2 State policies**

You should be familiar with your SEA's policies regarding awarding funds and grants to LEAs. States may have specific requirements related to the process by which funds are allocated, state board involvement, proposal review, etc. Moreover, it is important to ensure that the SEA administration and budget office understand the intent and legislative requirements for the McKinney-Vento subgrant program.

## **F.3 Planning the process**

State coordinators must decide the answers to a number of questions before preparing the subgrant process.

### **F.3.1 How long should the subgrant cycle be?**

The McKinney-Vento Act states that subgrants can be awarded for terms not to exceed three years. Most states implement a three-year cycle; in monitoring visits, federal monitors

have recommended that states with a cycle less than three years change to a three-year cycle. The longer cycle allows for greater program continuity and enables state coordinators to monitor and assist subgrantees in strengthening their program during the implementation phase. In addition, the application and award process requires significant time and effort both at the state and local levels. Any benefits in conducting the process more frequently than three years do not outweigh the time and effort taken away from providing programmatic activities and services.

### **F.3.2 How many and what size subgrants should be awarded?**

The size and number of subgrants awarded in a state varies widely. The 2009 survey of state coordinators indicated that the average number of subgrants awarded in a state was 16, with the lowest number being two and the highest number being 92. The 2009 survey also showed that the average low range for awards was \$29,000 and the average high range for awards was \$114,776. [Click here to review Appendix F-2, List of States with Numbers of LEAs with and without Subgrants.](#) The determination of the number and size of subgrants should be based on the demographics and needs of each state. The following table illustrates benefits and concerns related to how subgrant funds should be disbursed.

**Table F-1. Determining amount and number of subgrant awards**

Amount	Benefits	Concerns
Small subgrants/many awards	<ul style="list-style-type: none"> <li>– Good for states that have small to moderate numbers of homeless students in most districts</li> <li>– Good for states that have districts that could benefit from start up funds to build their MV program</li> <li>– Provides broad coverage of LEAs</li> </ul>	<ul style="list-style-type: none"> <li>– May spread the funds too thin for significant program impact</li> <li>– Not the best choice if some LEAs have large numbers of homeless students, such as urban areas, that have need for greater amounts of funding</li> </ul>
Large subgrants/few awards	<ul style="list-style-type: none"> <li>– Most beneficial in states with a few high need districts and most districts with lower numbers of homeless students and needs</li> <li>– Enables funds to be concentrated where the needs are greatest</li> </ul>	<ul style="list-style-type: none"> <li>– Districts with smaller numbers would not receive funding but could benefit from award funds and a program plan to help identify homeless students and build a program</li> </ul>

Some states, such as Texas and North Carolina, use a tiered approach to making subgrant awards. In these states, districts are categorized according to the number of homeless students identified, and each category is eligible for a certain range of funding, with lower amounts available to those with lower numbers of homeless students and higher amounts available to those with higher numbers. The tiered approach enables the greatest amount of the subgrant funds to target the districts with the greatest need while enabling districts with lower numbers to have funding to build their program. (See the [NCHE web state and local resources page](#) to review requests for subgrant proposals from various states, including Texas and North Carolina.)

### **F.3.3 Can subgrants be awarded to regional entities?**

Some states award subgrants to regional entities or consortia of LEAs. Michigan, with over 800 LEAs, is an example of a state that awards subgrants in this way. In 2009, the state coordinator explained that regional subgrants enabled the state to maximize the distribution of the subgrant funds and include more LEAs. Smaller districts with lower numbers that had not participated in the competitive subgrant process were able to increase services for their homeless students through the regional consortium approach. The regional approach decreased administrative costs and fostered greater collaboration among LEAs. Moreover, the state coordinator reported that she was able to more effectively oversee the work of and train 30 regional consortia coordinators, instead of coordinators in each participating LEA. In turn, the regional grant coordinator feels that she is more easily accessible to participating district homeless liaisons for consultation and assistance than SEA staff.

However, federal monitoring of some states utilizing the regional approach has raised concerns related to compromising the competitive process and divesting tasks, authority, and oversight that should rest with the office of the state coordinator. Procedures and safeguards must be implemented such that a regional approach to awarding subgrants ensures that (1) the state coordinator retains sufficient authority and oversight of the local level implementation of the McKinney-Vento Act, and (2) local capacity is sufficient to carry out the required tasks. In addition, the regional approach should ensure that LEAs with the greatest need are provided

funds to meet the needs of homeless students and that funds are not spread too thin to have significant impact. States that disseminate McKinney-Vento funds in regional grants should evaluate the effectiveness of this approach on an ongoing basis.

NCHE will examine the regional approach to awarding subgrants and develop a publication detailing its effectiveness in 2011.

#### **F.3.4 What are some considerations for developing a timeline to conduct the subgrant process?**

McKinney-Vento subgrants must be awarded to LEAs in a timely way, namely, at the beginning of each school year for optimal program implementation. In planning the subgrant process, be sure to allow sufficient time for LEAs to develop their proposals and avoid times of the year when they are likely to be extraordinarily busy, such as during state assessments. Also, you should be aware of other discretionary grant processes taking place at the same time and select another time for the McKinney-Vento subgrant process. Small LEAs frequently have staff available on a nine-month contract, so they would not be able to effectively complete an application during the summer break.

Other considerations for the timeline include:

- Technical assistance activities to familiarize LEAs with the application and proposal development process
- Announcing the availability of the request for proposals (RFP)
- Training for proposal reviewers
- The proposal review process
- State processes for grant approval
- State processes for disbursing funds to awardees
- The award notification process

The state plan, which is on file with ED, should include a description of the state's subgrant process. If a state significantly changes the subgrant process, the state coordinator must notify the federal coordinator for the EHCY Program.

#### **F.4 Developing or revising the RFP**

Well in advance of the McKinney-Vento subgrant process, state coordinators should review the RFP for the past cycle and determine if and/or how it should be revised. Recommendations in the following section along with a review of examples of subgrant RFPs from other states will provide you with the guidance you need to ensure that your RFP meets the requirements of the law and helps applicants envision and describe competitive proposals.

##### **F.4.1 Purpose of the RFP**

The RFP should be viewed as a blueprint for the subgrant program and a contractual agreement for how the LEA will spend the funds. It should be detailed enough to lead the LEA through a process to link its needs for homeless children and youth with goals, objectives, activities, and expenditures. However, it should not require so much detail that it will create a barrier for LEAs that need the funds to apply, especially for ones that do not have grant writers. The application must require sufficient detail, nevertheless, for reviewers to evaluate the quality of the proposal for the competitive process.

After each subgrant application process, you should review the submitted applications to determine the strengths and weaknesses of the RFP and make any needed revisions for the next cycle. Many state's subgrant RFPs are posted on the [NCHE subgrant resource page](#) and provide a wide range of approaches to developing the RFP.

##### **F.4.2 Program perspective reflected in the RFP**

LEAs should view the subgrant as a program, not a set of activities. The program should be an integrated and comprehensive approach to providing services for homeless children and youth that shows a direct connection between needs, goals, objectives, activities, and expenses. The strength of the proposal should derive from the linkages between program

elements and ultimately illustrate that the funding will address the specific needs and goals. Therefore, a LEA that proposes to spend the funds only on a limited set of activities or on one type of activity such as transportation would most likely not be competitive. The RFP should be designed in a way to allow the LEA to show how all program elements are linked.

#### **F.4.3 Critical components of the RFP**

In reviewing the RFP, make sure the following components are clearly addressed:

**Eligibility requirements for application.** Grants must be awarded to LEAs as the fiscal agent. Some states limit eligibility to LEAs that have identified a certain number of homeless children and youth to ensure that funds target LEAs with the greatest need.

**Instructions for completing the application.** The application should include information on the following:

- Deadline for submission and method of submission
- Length of the application, line spacing, margins
- Signatures required
- Proposal components to be completed by the applicant

Following are the most common components of McKinney-Vento subgrant applications:

**Statement of need.** Applicants should provide information on number of homeless students identified, socio-economic and demographic data and trends, data from a needs assessment, status of the current program, and community resources.

**Program description.** The proposal should include prioritized needs, goals, objectives, activities, outcomes with a clear depiction of the linkages between each. Staffing and program management should be included as well. The application should provide a timeline for program implementation and address any changes that will occur from year to year in the multiple year award.

**Collaborations.** The proposal should include a description of collaborations in place both within the LEA and within the community. Some state coordinators require evidence of input from collaborators such as signatures or memoranda of agreement. The application

should require evidence of collaboration with Title I, Part A and should require applicants to include the amount of the Title I set aside for homeless students and an explanation for how the funds will be spent.

**Staff.** Applicants should include a staffing plan for the program with duties that link clearly to the activities, goals, and needs.

**Budget.** The budget should be detailed and link clearly to the program activities and expenses. Moreover, the budget should reflect only allowable expenses. The budget should also show cost and resource sharing with the LEA, other federal programs, and external agencies. A budget should be included for each year of the program if the program activities will differ from year to year.

**Program evaluation.** With an increasing emphasis on accountability and effectiveness for all federal programs, the proposal should include a strong evaluation plan with strategies for collecting data on measurable objectives that will demonstrate progress toward goals.

**Signatures and assurances.** The proposal should provide evidence that the LEA is committed to carrying out the subgrant program in the form of signatures from administrators for assurances that reflect the requirements of the subgrant program. See Section 723(b) of the McKinney-Vento Act lists the following assurances that subgrant applications should include:

- (3) An assurance that the local educational agency's combined fiscal effort per student, or the aggregate expenditures of that agency and the State with respect to the provision of free public education by such agency for the fiscal year preceding the fiscal year for which the determination is made, was not less than 90 percent of such combined fiscal effort or aggregate expenditures for the second fiscal year preceding the fiscal year for which the determination is made.
- (4) An assurance that the applicant complies with, or will use requested funds to comply with, paragraphs (3) through (7) of section 722(g).

**Supporting information.** State coordinators should make supporting information available to subgrant applicants as appendices to the RFP or web links. The objective of providing this information is to clarify requirements and expectations for the subgrant program so that applicants can develop a quality application and program coordinators can be clear on

the expectations for the subgrant program. Following are items that would be useful as supporting information:

- Background on McKinney-Vento and legislative requirements for subgrants (excerpts from McKinney-Vento, including 16 allowable activities)
- Criteria for review and scoring rubric
- [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](#)
- Subgrantee monitoring indicators developed by the state coordinator
- Forms (budget, program components chart, program evaluation template, staffing chart)

#### **F.4.4 Announcing the availability of the RFP**

State coordinators should announce the availability of the RFP foremost to local homeless liaisons. In addition, local superintendents, budget offices, Title I coordinators, and development offices should be aware of the process. State coordinators should coordinate with SEA administrators for a statewide dissemination of the announcement through multiple venues so that several people in each LEA will be aware.

#### **F.4.5 Providing training and technical assistance to LEAs on developing their subgrant proposal**

The time spent helping LEAs understand the expectations of the subgrant program and develop quality applications will pay off when applications reflect an understanding of the program and provide a clear picture of what the LEA plans to do with the funding. Moreover, training and technical assistance levels the playing field among LEAs, some of whom have grant writers available but most of whom do not. An example of a Power Point presentation provided to prospective applicants in Michigan can be found [here](#).

The RFP packet should include detailed instructions for how to complete the application, including forms and checklists. In addition, the state coordinator should be available to answer questions from specific LEAs during the proposal writing process.

## **F.5 Application review process**

A carefully planned application review process will ensure that decisions for subgrant awards are objective and fair. Ultimately, the process should result in reviewer consensus on the most well-conceived proposals and ones that are the most responsive to the RFP.

### **F.5.1 Review your state requirements**

Many states have requirements for the review process for discretionary grants, such as requirements for the number and types of reviewers, the type of rubric or criteria, and documentation of the review process. State coordinators should be familiar with their state's policies for grant review.

### **F.5.2 Develop a rubric**

A strong rubric will assist reviewers in determining the quality of the subgrant applications. The rubric, provided as supporting material, will assist applicants in writing to specific criteria. A rubric is a scoring or rating guide that can help standardize the evaluation of proposals. It is more than a checklist in that it provides a way to identify various levels of quality. It is often presented in matrix form with the levels of quality described in detail.

Here are some tips on creating a rubric for subgrant proposals:

Identify the elements or criteria that will be used to evaluate the proposal. Keep the list manageable (8-10 items) and focus on the most important qualities you would like to see in the proposal. You may identify these from the requirements in the law, elements that generally comprise strong grant proposals, and/or qualities that you've identified from strong subgrant proposals you have received in the past.

Assign values, either numeric or descriptive, to varying levels of proposal quality, such as a 5-0 rating or categories such as excellent, adequate, fair, and unacceptable.

Develop a clear description for these values for each of the proposal elements. One strategy is to describe the characteristics of the best case and the worst case, and then develop

intermediate examples that feature the most frequent short comings in the proposals which make these elements fall short of the ideal or of the redeeming qualities that make an element better than the worst case. Another strategy is to review proposals from an earlier subgrant cycle and divide them into best, adequate, fair, and unacceptable groups and describe the qualities that characterize these groups. Then use these descriptions for the values for the rubric.

An alternative to starting from scratch is to review the scoring guide or rubric from an earlier subgrant cycle and to revise and build on it. Or, state coordinators may want to adapt a scoring guide from another state's subgrant review process. State coordinators should test the rubric by scoring a few grant proposals and identifying parts that need clarification or revision. For an example of a McKinney-Vento subgrant application rubric, view the rubric for the [North Carolina Homeless Education Program](#).

### **F.5.3 Train reviewers**

Each proposal should be read by at least two reviewers, preferably three. Reviewers with a background in the McKinney-Vento program will be familiar with the intent of the subgrants. However, a reviewer from another program who has proposal writing experience could provide an objective perspective on the quality of the subgrant proposals.

Reviewers should receive training on the review process to become familiar with federal and state requirements for the subgrants and to become familiar with the rubric. An opportunity for the reviewers to meet and review several proposals together using the rubric will establish inter-rater reliability and decrease the likelihood of wide discrepancies in individual scoring. This meeting will also serve as a pilot test for the rubric so that any needed revisions can be made before it is used for all the applications.

After reviews and score sheets are submitted, the state coordinator should convene a meeting of reviewers to discuss proposals with divergent scores.

## **F.6 Award selection**

The state coordinator should review the recommendations of the reviewers against the amount of funds available for subgrants, and decide how to award the funds. In some instances, the state coordinator will fully award as many of the top scoring proposals as the funds will allow. In other instances, the state coordinator will spread the funds over more LEAs by awarding a percentage of the amount requested by the LEAs recommended for funding. In all cases, the funds awarded must be at least 75 per cent of the state's annual McKinney-Vento allocation (unless the state is a minimum funded state in which at least 50 per cent must be awarded).

The state coordinator should develop an award letter and determine who should receive and be copied on the letter. Award letters should include:

- The amount of the award for the first year of the subgrant cycle (with an explanation of the multi-year award)
- A disclaimer that the amount is contingent upon the annual McKinney-Vento allocation provided to the state
- Duration of the grant
- Date of availability of the funds
- Statement that the award is contingent upon the LEA implementing the program as described in the proposal and meeting state requirements for reporting and monitoring

## **F.7 Subgrantee oversight**

State coordinators should have several means to ensure that subgrant program coordinators serve homeless students effectively and spend funds in allowable and strategic ways. Grantees should maintain documentation of program activities and impact so that it may be periodically reviewed by their state coordinator.

### **F.7.1 Training and technical assistance**

All LEAs should receive training and technical assistance on implementing the McKinney-Vento Act. Subgrantees should receive additional support in implementing their program,

spending funds appropriately, and evaluating their program. See **Section G: Fiscal Oversight** (link) for information on subgrant use of funds.

### **F.7.2 End-of-year reports**

Requiring an end-of-year report from each subgrantee is an effective way to desk monitor the implementation of the program. Additionally, developing the report enables the program coordinator to review the year's activities against the proposed activities and reinforces grant accountability. The report should include the activities undertaken, barriers, successes, and evaluation data to show progress toward attaining goals listed in the proposal. The report format should strike a balance between including enough detail to depict the status of the program without burdening the program coordinator to unduly detract from providing services. Sample end-of-year report formats are included in the [NCHE state and local resources page](#).

### **F.7.3 Budget oversight**

Budget oversight is an important part of the state coordinator's responsibility for subgrantee oversight. See the subgrantee budget oversight section in Section G: Fiscal Oversight.

### **F.7.4 Monitoring**

ED expects that each subgrantee will be monitored on site during the subgrant cycle. For suggestions on monitoring, see Section D: Monitoring.

## **F.8 Links to helpful documents**

Subgrant RFPs from various states on the [NCHE McKinney-Vento Subgrants Page](#)

NCHE'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](#)

## Appendix F-1. McKinney-Vento Act Section 723, Allowable Use of Funds

- (d) AUTHORIZED ACTIVITIES- A local educational agency may use funds awarded under this section for activities that carry out the purpose of this subtitle, including the following:
- (1) The provision of tutoring, supplemental instruction, and enriched educational services that are linked to the achievement of the same challenging State academic content standards and challenging State student academic achievement standards the State establishes for other children and youths.
  - (2) The provision of expedited evaluations of the strengths and needs of homeless children and youths, including needs and eligibility for programs and services (such as educational programs for gifted and talented students, children with disabilities, and students with limited English proficiency, services provided under title I of the Elementary and Secondary Education Act of 1965 or similar State or local programs, programs in vocational and technical education, and school nutrition programs).
  - (3) Professional development and other activities for educators and pupil services personnel that are designed to heighten the understanding and sensitivity of such personnel to the needs of homeless children and youths, the rights of such children and youths under this subtitle, and the specific educational needs of runaway and homeless youths.
  - (4) The provision of referral services to homeless children and youths for medical, dental, mental, and other health services.
  - (5) The provision of assistance to defray the excess cost of transportation for students under section 722(g)(4)(A), not otherwise provided through Federal, State, or local funding, where necessary to enable students to attend the school selected under section 722(g)(3).
  - (6) The provision of developmentally appropriate early childhood education programs, not otherwise provided through Federal, State, or local funding, for preschool-aged homeless children.

- (7) The provision of services and assistance to attract, engage, and retain homeless children and youths, and unaccompanied youths, in public school programs and services provided to nonhomeless children and youths.
- (8) The provision for homeless children and youths of before- and after-school, mentoring, and summer programs in which a teacher or other qualified individual provides tutoring, homework assistance, and supervision of educational activities.
- (9) If necessary, the payment of fees and other costs associated with tracking, obtaining, and transferring records necessary to enroll homeless children and youths in school, including birth certificates, immunization or medical records, academic records, guardianship records, and evaluations for special programs or services.
- (10) The provision of education and training to the parents of homeless children and youths about the rights of, and resources available to, such children and youths.
- (11) The development of coordination between schools and agencies providing services to homeless children and youths, as described in section 722(g)(5).
- (12) The provision of pupil services (including violence prevention counseling) and referrals for such services.
- (13) Activities to address the particular needs of homeless children and youths that may arise from domestic violence.
- (14) The adaptation of space and purchase of supplies for any nonschool facilities made available under subsection (a)(2) to provide services under this subsection.
- (15) The provision of school supplies, including those supplies to be distributed at shelters or temporary housing facilities, or other appropriate locations.
- (16) The provision of other extraordinary or emergency assistance needed to enable homeless children and youths to attend school.

## **Appendix F-2. Abbreviated Version of Section 723 - Allowable Use of Funds**

- 1) Supplemental educational services such as tutoring and other academic enrichment programs
- 2) Expedited evaluations for various educational services
- 3) Professional development activities for educators and pupil services personnel working with homeless students
- 4) Health referral services
- 5) Defraying the excess cost of transportation to enable students to attend the school of origin
- 6) Provision of early childhood education programs for pre-school aged homeless children
- 7) Services to retain unaccompanied youths in public school programs
- 8) Before- and after-school, mentoring, and summer programs with educational activities
- 9) Payment of fees and costs associated with tracking, obtaining, and transferring records
- 10) Education and training for parents of homeless children and youth about rights and resources
- 11) Development of coordination between schools and agencies providing services
- 12) Provision of pupil services (including violence prevention counseling) and referrals for such services
- 13) Activities to address needs that may arise from domestic violence
- 14) Adaptation of space and purchase of supplies for non-school facilities to provide services listed above
- 15) Provision of school supplies, including those to be distributed at shelters or other appropriate locations
- 16) Other extraordinary or emergency assistance needed to enable homeless students to attend school.

(Excerpted from the January 2009 *Homeless Education Disaster Assistance FAQ Guidance and April 2009 McKinney-Vento ARRA Guidance*)

**Appendix F-3. List of States with Numbers of LEAs with and without subgrants based on 2008-2009 CSPR Federal Data**

State Name	LEAs without subgrants	LEAs with subgrants	Total LEAs
ALABAMA	97	35	132
ALASKA	50	4	54
ARIZONA	191	24	215
ARKANSAS	231	14	245
BUREAU OF INDIAN EDUCATION	164	9	173
CALIFORNIA	1436	90	1526
COLORADO	146	33	179
CONNECTICUT	184	13	197
DELAWARE	7	12	19
DISTRICT OF COLUMBIA	57	1	58
FLORIDA	34	33	67
GEORGIA	150	30	180
HAWAII	0	1	1
IDAHO	125	9	134
ILLINOIS	862	0	862
INDIANA	321	20	341
IOWA	341	10	351
KANSAS	288	7	295
KENTUCKY	155	19	174
LOUISIANA	87	15	102
MAINE	296	3	299
MARYLAND	12	12	24
MASSACHUSETTS	377	16	393
MICHIGAN	333	499	832
MINNESOTA	503	7	510
MISSISSIPPI	135	17	152
MISSOURI	547	9	556
MONTANA	416	5	421
NEBRASKA	245	9	254
NEVADA	14	3	17
NEW HAMPSHIRE	184	5	189
NEW JERSEY	650	8	658
NEW MEXICO	74	15	89
NEW YORK	588	284	872
NORTH CAROLINA	90	25	115
NORTH DAKOTA	187	6	193

State Name	LEAs without subgrants	LEAs with subgrants	Total LEAs
OHIO	1006	51	1057
OKLAHOMA	514	18	532
OREGON	155	41	196
PENNSYLVANIA	0	8	8
PUERTO RICO	0	1	1
RHODE ISLAND	42	5	47
SOUTH CAROLINA	70	16	86
SOUTH DAKOTA	159	2	161
TENNESSEE	124	15	139
TEXAS	1161	120	1281
UTAH	32	8	40
VERMONT	57	4	61
VIRGINIA	103	29	132
WASHINGTON	256	39	295
WEST VIRGINIA	41	14	55
WISCONSIN	430	12	442
WYOMING	4	44	48
Total	13,731	1,729	15,460

## **Section G. Fiscal Oversight**

Each year, ED allocates funds to each SEA on a formula basis. The SEA must use funds to conduct state activities identified in Section 722(f) Functions of the Office of Coordinator and award not less than 75 percent of the funds to LEAs in a competitive subgrant process (not less than 50 percent for minimum-funded states).

Federal monitoring is an important part of the SEA's accountability for McKinney-Vento funds. You should be familiar with federal and state finance policies and be able to connect all expenses related to the homeless education program at the state level to services for homeless children and youth.

In addition, as the state coordinator, you are responsible for overseeing the expenses of LEA McKinney-Vento subgrants and should include a careful review of subgrant expenses in end-of-year reports from LEAs with subgrants and in monitoring visits. State coordinators are frequently asked to provide guidance to LEAs with subgrants on what types of expenditures are allowable with McKinney-Vento funds. Section G provides information on federal fiscal management policies, state program planning and budgeting, considerations for state-level expenditures, and considerations for determining allowable expenditures for subgrants. Suggestions are also provided for coordinating with the Title I program to ensure that appropriate Title I, Part A funds are set aside for homeless students in LEAs.

Section G will equip state coordinators with the understanding of fiscal policies and expectations to ensure that the SEA and LEAs – both with and without subgrants – are accountable for all expenditures related to the McKinney-Vento program.

### **G.1 State fiscal responsibilities outlined in the McKinney-Vento Act**

Section 722(d), the McKinney-Vento Act lists state-level activities that support the implementation of the Act, including the designation of an Office of Coordinator for Education of Homeless Children and Youths in the SEA.

A significant portion of the funding for state-level activities may be used to support the salary of the state coordinator and other staff for data collection, state plan implementation,

needs assessment, cross-program and cross-agency coordination and collaboration, and technical assistance to and monitoring of LEAs.

The SEA must distribute not less than 75 percent in subgrants to LEAs [Sec. 722(e)]. The remaining 25 percent supports the salary and work of the state coordinator and other state-level activities. (Minimum funded states must distribute not less than 50 percent in subgrants and may reserve up to 50 percent of the funds for state-level activities.)

## **G.2 Federal fiscal management policies**

This section identifies the key policies that you should know related to fiscal management.

Federal administrative requirements are found in: [Education Department General Administrative Regulations \(EDGAR\), 34 CFR Part 80](#) (Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments).

The Code of Federal Regulations (CFR) provides general and permanent rules published in the Federal Register related to federal grants management. Title 34 of the CFR pertains to the U.S. Department of Education and related federal entities. Parts 74-99 of that title are collectively known as the Education Department General Administrative Regulations (EDGAR). EDGAR contains regulations for administering discretionary and formula grants awarded by ED. Included are topics like contract administration, record keeping, financial reporting, and fiscal accountability. EDGAR not only pertains to the administration of McKinney-Vento funds allocated for state-level activities, but should guide administration of McKinney-Vento subgrants. Most finance departments at the state and local level are familiar with EDGAR.

Federal policies related to cost principles are found in: [OMB Cost Circular A-87, Cost Principles for State, Local and Indian Tribal Governments \(relocated to 2 CFR, Part 225\)](#).

OMB Cost Circular A-87 established principles and standards for determining costs for federal awards carried out through grants, cost reimbursement contracts, and other agreements with state and local governments and federally-recognized Indian tribal governments. Particularly pertinent to the fiscal management of the McKinney-Vento state-

level activities and subgrants, are the policies related to the allowability and reasonability of costs. Click here to access Appendix G-1, Allowability and Reasonability of Costs.

The Tydings Amendment, section 421(b) of the General Education Provisions Act (GEPA). The Tydings Amendment, adopted by Congress and incorporated in GEPA, provides education agencies additional time to spend the Federal funds they receive. Based on the Tydings Amendment, EDGAR allows grantees to carryover for one additional year any Federal education funds that were not obligated in the period for which they were appropriated. For grants that are forward-funded, grantees can have up to 27 months to obligate appropriated funds beginning as early as July 1 of the Federal fiscal year. Unless an extension is approved, grantees must liquidate obligations within 90 days of the end of the funding period. To provide an example, funds awarded by ED to your state for McKinney-Vento during summer 2010 can be used for expenses encumbered July 1, 2010 through September 30, 2012 and all financial processing should be finished before the end of 2012.

### **G.3 Indirect costs**

Funds for the EHCY program must use a restricted indirect cost rate because there is a supplement, not supplant, provision for subgrants under Section 723(a)(3). Restricted indirect costs rates are likely to be only a small percent but in some LEAs it can be nearly ten per cent and the indirect cost rate can be close to 20 percent. ED approves the restricted and unrestricted cost rates for every LEA through its indirect cost rate group. Further information related to related policies on indirect costs are found at the [Office of the Chief Financial Officer](#).

It is also important to separate indirect cost for overhead with administrative costs, which some SEAs allow but usually no more than five per cent or less. Finally, many authorized activities are administrative in nature, e.g., records transfer, and it would be better to list these costs as budget items.

### **G.4 Program planning and budgeting**

State coordinators should develop an annual plan for state-level activities based on statewide needs assessment and program evaluation data, responsibilities outlined in the law,

and federal expectations detailed in monitoring indicators. See Section B – Charting the Course. The state coordinator should prioritize needs based on those identified in the needs assessment and based on findings and recommendations from federal monitoring. In much the same way as one would develop a grant proposal, the state coordinator should develop annual goals, objectives, and activities in preparation for developing an annual budget that includes expenses, staff, travel, indirect, etc. Each budget item should connect to the annual plan so that it can be justified as supporting an activity related to the education of homeless children and youth. This approach, while common to grant-funded projects, is relatively new for federal formula grants, but one that is encouraged by the federal program office. (See Section B for an example of an annual plan for state-level activities.) These state plans, with annual goals and activities, are an important justification for the use of the SEA reservation for state-level coordination activities and for prioritizing criteria for LEA subgrant awards.

#### **G.5 Record keeping**

Section 74.53 of the CFR includes specific requirements for record retention and access.

The section states that:

Financial records, supporting documents, statistical records, and all other records pertinent to an award shall be retained for a period of three years from the date of submission of the final expenditure report or, for awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, as authorized by the Secretary.

Therefore, all records should be kept for a minimum of three years after each end of year report (unless a longer time is specified by state policy).

Section 76.30 of the CFR specifies the type of information that should be included in the records:

A state and a subgrantee shall keep records that fully show:

- (a) The amount of funds under the grant or subgrant;
- (b) How the state or subgrantee uses the funds;

- (c) The total cost of the project;
- (d) The share of that cost provided from other sources; and
- (e) Other records to facilitate an effective audit.

Recent federal monitoring protocols require state coordinators to provide budget sheets that are detailed and transparent to account for how all state activity funds are spent and how and when all subgrant funds are disbursed to LEAs. State coordinators must ensure that all funds are spent on activities allowed by the McKinney-Vento Act. In order to do this, state coordinators should submit an annual budget for state activities for approval to SEA administration and follow up periodically to ensure accountability.

#### **G.6 Use of funds for state-level activities**

In developing an annual budget and determining if expenses are allowable and appropriate, consider the following questions:

- Does the expense support the responsibilities of state-level coordination and administration outlined in law?
- Does this expense cover services that apply only to the homeless education program and are connected to the educational needs specifically of homeless children and youth?
- Does the expense align with federal grant and state budget administrative guidelines?
- Does the expense fit within goals articulated in the state plan and annual plan?
- Does the expense address a need that was identified as a priority based on a comprehensive needs assessment?
- Is the expense included, and was it approved, in the annual budget proposal developed as part of the annual plan?
- Is the expense necessary for efficient operation of the homeless education program at the state level?
- Is there reasonability in proportion of specific budget items?
- Is the cost for a particular service reasonable?

Following is a list of some of the more common uses of state-level activity funds:

- Salary for the state coordinator and other homeless education staff
- State or regional trainings for local liaisons
- State conferences
- Individualized technical assistance
- State level collaborations (advisory boards, cross-agency task forces)
- Homeless education websites
- Awareness materials
- Training materials
- State coordinator professional development (conference and meeting attendance)
- Monitoring LEAs
- Conducting the McKinney-Vento subgrant process
- Policy review and revision
- Data collection

Other uses of state-level activity funds may include:

- Contracted services when available time is an issue, or when additional expertise is needed
- Mini-grants to LEA homeless projects (identification activities in districts with few or no homeless students identified, transportation support, local liaison conference attendance)
- Statewide needs assessment and program evaluation activities
- Activities that focus on homeless preschool and/or unaccompanied youth
- Regional technical assistance projects

### **G.7 Fiscal oversight of LEAs**

All LEAs are required to implement the McKinney-Vento Act whether or not they receive subgrant funds. Certain requirements in the law necessitate that LEAs provide resources and support serving homeless children and youth. Although LEAs are not required to report district expenses related to the McKinney-Vento Act to the state coordinator, documenting time and effort and salary for the local liaison and for expenses such as transportation or academic support is helpful for needs assessment purposes to determine the level of need for serving

homeless students in the district and for positioning the LEA to successfully apply for a subgrant. Moreover, the LEA should document community resources that are contributed to serve homeless students. In trainings, the state coordinator should encourage LEAs to document expenses related to homeless children and youth.

#### **G.8 Fiscal oversight of the Title I, Part A homeless set aside**

The state coordinator should provide guidance for local liaison coordination with their Title I coordinators to determine an appropriate Title I, Part A set aside amount for homeless students. The state coordinator, along with the state Title I staff, should provide information and training on how local liaisons and local Title I coordinators should determine an appropriate set aside amount, develop a budget for expenses, and implement a process to ensure that the funds are spent on homeless students.

There are various methods, and no one prescribed method, for determining a suitable LEA reservation to provide comparable services to homeless students in non-Title I schools as well as to provide additional educationally-related support services to homeless students served by Title I programs and at shelters and other places where they may reside. Some state coordinators have recommended that subgrant districts set aside Title I, Part A funds for homeless students in amounts that equal or exceed the subgrant amount since those awards were based on LEA needs assessments. Some states have developed formula-based methods of determining the Title I, Part A set aside amount, with several being in the range of \$200-\$300 per homeless student identified. Even for LEAs without McKinney-Vento subgrants, an increasingly popular method entails conducting a comprehensive needs assessment and utilizing the results to make decisions on the appropriate amount for the homeless set aside. Link to [\*Educating Homeless Children and Youth: Conducting Needs Assessments and Evaluating Services – A Guide for SEAs, LEAs, and Local Schools.\*](#)

At the state level, SEA Title I program staff, in coordination with the McKinney-Vento the state coordinator should annually review the Title I set aside amount for each LEA and coordinate with the state Title I staff to provide technical assistance to those LEAs that have no Title I, Part A set aside funds for homeless students, have insufficient set aside funds, or are not

spending funds that have been set aside for homeless students. The McKinney-Vento state coordinator should include an indicator that addresses the amount and use of the Title I, Part A homeless set aside in the monitoring of LEAs, and coordinate with the state Title I director to have a similar indicator in the Title I monitoring of LEAs. Link to [McKinney-Vento 2001 Law into Practice: McKinney-Vento and Title I.](#)

### **G.9 Fiscal oversight of LEAs with subgrants**

The McKinney-Vento state coordinator must oversee the budget for the McKinney-Vento subgrants, including approving amendments to the budget. This oversight will entail having access to the SEA's system for expenditure reports for the subgrants and requiring a budget sheet and/or budget narrative in the subgrantee end-of-year reports.

Discrepancies between proposed expenses and actual expenses must be addressed with the subgrantee. The state coordinator should require that the subgrantee provide an explanation for any budget amendments to the state coordinator so that the state coordinator can review and approve the amendments. This process will likely require coordination with the SEA budget office.

The state coordinator should discourage subgrantees from having significant unobligated funds to be carried over. If a subgrantee has carryover funds, the coordinator should provide an explanation in the end-of-year report and submit a plan for how the funds will be spent in the following year. Significant carry over funds could indicate that the LEA overestimated the need for homeless students in the LEA or has had difficulty committing adequate time to the program, potentially impacting subsequent funding.

### **G.10 Use of funds for McKinney-Vento subgrants**

SEAs award McKinney-Vento subgrants to LEAs to provide services to ensure the school access, retention, and success of children and youth experiencing homelessness. The McKinney-Vento Act provides explicit information on the purpose and uses of the funds; nevertheless, questions frequently arise as to the appropriate use of funds. State coordinators for homeless

education and local program coordinators in their oversight of the subgrant program must determine if certain expenditures are appropriate.

### **G.10.1 The McKinney-Vento Act and federal guidelines**

See the discussion of federal requirements for McKinney-Vento subgrants in Section F: McKinney-Vento Subgrants and a list of allowable subgrant expenditures Section 723 of the McKinney-Vento Act in Appendix F-1.

In addition, subgrant expenditures are subject to the requirements for administration of federal grants and cost principles. See discussion of *EDGAR, 34 CFR Part 80* and *OMB Cost Circular A-87* above.

### **G.10.2 Guiding questions for use of funds for McKinney-Vento subgrants**

When determining if a subgrant expense is appropriate, consider the questions found in Table G-1.

**Table G-1. Guiding Questions for Subgrant Use of Funds.**

Foundation	Questions
The Law	<ol style="list-style-type: none"> <li>1. Does the expense meet the intent of the law? That is, does the expense facilitate the school enrollment, attendance, and success of homeless children and youth? Moreover, is it critical to maintaining the enrollment, attendance, and success of homeless students or even just one homeless student?</li> <li>2. Does the expense fit in with one of 16 authorized activities in Section 723 of the law?</li> <li>3. Does this expense cover services that apply only to the homeless education program and are connected to the educational needs specifically of homeless children and youth? (The exception would be for services provided on school grounds; these services may include a small percentage of other at-risk students.)</li> </ol>
The Subgrant Proposal	<ol style="list-style-type: none"> <li>1. Does the expense fit within goals articulated, and approved, in subgrant proposal?</li> <li>2. Does the expense meet a need that was identified as a priority need based on a comprehensive needs assessment?</li> <li>3. Was the expense included, and approved, in the subgrant budget?</li> <li>4. Is the expense necessary for efficient operation of the homeless education program?</li> </ol>

Foundation	Questions
	<ol style="list-style-type: none"> <li>1. Is there reasonability in proportion to the rest of the program budget and how much is being spent per student? Or, if this is an expense for one student, is it proportional to other program or students' needs?</li> <li>2. Is the cost for this service reasonable?</li> </ol>
Coordination	<ol style="list-style-type: none"> <li>1. Is this expense for supplemental services, and not for services that should be paid for by the LEA as part of the regular academic program?</li> <li>2. Are there comparable services that the LEA provides to non-homeless students and should provide to homeless students?</li> <li>3. Is there evidence of coordination with Title I for use of the Title I homeless set aside?</li> <li>4. Has an effort been made to obtain this service from another source, such as business partners and service agencies?</li> <li>5. Is this expense beyond the scope of the McKinney-Vento program and would be more appropriately covered by a community service agency?</li> </ol>

### G.10.3 Discussion of categories of expenses for McKinney-Vento subgrant funds

The following discussion of subgrant expenditures is meant not to serve as guidance on what expenditures are allowable or not allowable but to illustrate a process for thinking through what expenses should be approved. All expenditures should be considered in reference to the Guiding Questions listed above.

**Supplies and Fees for Homeless Children and Youth.** In general, subgrant funds can be used to purchase supplies to enable homeless children and youth to participate fully in school activities. These supplies would include school supplies, clothing, backpacks, and calculators. However, before spending subgrant funds, the program coordinator should ensure that these supplies are (1) not already provided by the LEA to needy students and therefore should be provided to homeless students as comparable services; (2) not available through other sources, such as business partners or service agencies; and (3) reflect coordination with Title I for using the Title I homeless set aside.

**Academic Services/School Activities.** Subgrant funds may be used to pay fees for field trips, summer programs, and before- and after-school programs that have an educational purpose or component overseen by qualified staff. Day-care or after-school care would not be an appropriate use of funds, unless there is an educational component, such as tutoring, homework help, or educational enrichment overseen by a professional educator. The program

coordinator should look at comparable services – does the LEA support other students who cannot afford to participate in these activities? Or, is there a Title I-A after-school program already available in which the student may participate?

**Health Services.** Homeless education programs should make referrals for counseling, medical, and dental services. The intent of the subgrant program is not to provide ongoing medical and dental services, but to initiate collaborations for medical services and identify resources for referrals. However, subgrant funds can cover times when a homeless child needs medical or dental care in an emergency when other resources are not available.

Title I set aside funds can be used for counseling services and health services. Link to the 2009 Title IA ARRA Guidance ([Using Title I, Part A ARRA Funds for Grants to Local Educational Agencies to Strengthen Education, Drive Reform, and Improve Results for Students](#)) Section G-11 provides a list of allowable expenditures for the Title I-A homeless set aside.

**Transportation.** LEAs are required to remove educational barriers for homeless students caused by the lack of transportation. LEAs are required to provide transportation to and from the school of origin when attending the school of origin is in the best interest of the student. LEAs are also required to provide transportation services to homeless students comparable to housed students.

Subgrant funds may cover the “excess cost of transportation” for homeless students. Many school districts use some of their subgrant funds to supplement the cost of transporting homeless students when they have a large number of homeless students needing transportation to and from the school of origin, have a wide geographical area to cover, or need to provide specialized transportation services for educational activities that go beyond the comparable services the LEA provides to all students. These circumstances are what the law intended for an allowable use of a portion of subgrant funds for transportation. Subgrant funds used for transportation should be viewed in the context of the total McKinney-Vento subgrant proposal for meeting the broad range of need of homeless students. Fundable transportation strategies may include reimbursing parents for mileage, providing gas cards, and providing taxicabs.

**Emergency Services.** Emergency services are those that will alleviate a crisis that would prevent a homeless student from attending school and participating fully in school activities. These services usually require short-term expenses to resolve a crisis or to provide an interim service until a more permanent solution is attained. For example, subgrant funds could be used to obtain a birth certificate or temporarily pay for child care for a homeless teen parent to attend school until other arrangements are made.

Funds **may not** be used to pay hotel, motel, or utility bills for a student or his or her family because these expenses are outside of the scope of the purpose of the grant to support the educational needs of homeless students. Community collaborations should be in place for referrals to cover basic needs of families.

**Salaries and Program Administration.** All LEAs are required to designate a homeless liaison. However, if the need for serving homeless students is greater than what the LEA provides in its responsibility to implement the McKinney-Vento Act, then subgrant funds can support the expansion of the duties of the local liaison, and include other staff, if necessary, to carry out the authorized activities and facilitate the efficient administration of the subgrant program. Staffing included in the subgrant must be incorporated in the overall program plan to ensure that identified priorities and needs are met. Moreover, any funds provided for salaries must support duties to serve only homeless students and relate to the allowable activities.

**Training.** Professional development is one of the authorized activities for subgrants. Professional development may include training that the program provides to the LEA or community or training that McKinney-Vento program staff attends. Professional development or training activities should be justified in the subgrant proposal as they relate to stated needs, program goals, and the overall budget for the program.

## **G.11 Links to helpful documents**

[\*\*\*Education Department General Administrative Regulations \(EDGAR\), 34 CFR Part 80 \(Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments\)\*\*\*](#)

Examples of an Annual Plan for State-level Activities in Appendix B-5 and Appendix B-8

## **Appendix G-1. Allowability and Reasonability of Costs, 2 CFR Part 225, Cost Principles for State, Local, and Indian Tribal Governments (OMB Circular A-87)**

### *C. Basic Guidelines*

1. Factors affecting allowability of costs. To be allowable under federal awards, costs must meet the following general criteria:
  - a. Be necessary and reasonable for proper and efficient performance and administration of federal awards.
  - b. Be allocable to federal awards under the provisions of 2 CFR Part 225.
  - c. Be authorized or not prohibited under state or local laws or regulations.
  - d. Conform to any limitations or exclusions set forth in these principles, federal laws, terms and conditions of the federal award, or other governing regulations as to types or amounts of cost items.
  - e. Be consistent with policies, regulations, and procedures that apply uniformly to both federal awards and other activities of the governmental unit.
  - f. Be accorded consistent treatment. A cost may not be assigned to a federal award as a direct cost if any other cost incurred for the same purpose in like circumstances has been allocated to the federal award as an indirect cost.
  - g. Except as otherwise provided for in 2 CFR Part 225, be determined in accordance with generally accepted accounting principles.
  - h. Not be included as a cost or used to meet cost sharing or matching requirements of any other federal award in either the current or a prior period, except as specifically provided by federal law or regulation.
  - i. Be the net of all applicable credits.
  - j. Be adequately documented.
  
2. Reasonable costs. A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. The question of reasonableness is

particularly important when governmental units or components are predominately federally-funded.

In determining reasonableness of a given cost, consideration shall be given to:

- a. Whether the cost is of a type generally recognized as ordinary and necessary for the operation of the governmental unit or the performance of the federal award.
- b. The restraints or requirements imposed by such factors as: sound business practices; arm's-length bargaining; federal, state and other laws and regulations; and, terms and conditions of the federal award.
- c. Market prices for comparable goods or services.
- d. Whether the individuals concerned acted with prudence in the circumstances considering their responsibilities to the governmental unit, its employees, the public at large, and the Federal Government.
- e. Significant deviations from the established practices of the governmental unit which may unjustifiably increase the federal award's cost.

The Office of Management and Budget (OMB) relocated Circular A-87, "Cost Principles for State, Local, and Indian Tribal Governments," to Title 2 in the Code of Federal Regulations (2 CFR), Subtitle A, Chapter II, part 225 as part of an initiative to provide the public with a central location for Federal government policies on grants and other financial assistance and nonprocurement agreements.

[http://www.whitehouse.gov/omb/assets/omb/fedreg/2005/083105\\_a87.pdf](http://www.whitehouse.gov/omb/assets/omb/fedreg/2005/083105_a87.pdf)

## **Section H. Connections to Collaboration: Yours, Mine, and Ours**

Children and youth experiencing homelessness often face a vast array of challenges. To meet the needs of these young people requires a complex network of support. State coordinators may find themselves at meetings for infants and toddlers with development delays and disabilities one day and a summit on increasing the on-time graduation rate and transition to college the next. In addition to other education programs, state coordinators must work with health agencies, child welfare, and housing agencies. If you enjoy learning about new issues, being a state coordinator for the education of homeless children and youth may be an ideal assignment. Homeless education can be a great vehicle for ongoing professional development and relationship building.

This section of the state coordinators' handbook identifies the many players with whom state coordinators must interact and offers suggestions for how to make these relationships work effectively. Examples of successful collaborations shared by fellow state coordinators are included to provide practical examples of the difference these efforts make in the lives of children and youth experiencing homelessness.

Given the statutory requirements to bridge many programs and agencies and the expansive needs of families and children experiencing homelessness, SC could as easily be an abbreviation for "state collaborator" as "state coordinator." This section of the handbook will offer some basics to hone your skills in collaboration as well as highlight the many programs and people with whom state coordinators must interact.

### **A Short Course in Human Relations<sup>1</sup>**

The six most important words: "I admit I made a mistake."

The five most important words: "You did a good job."

The four most important words: "What is your opinion?"

The three most important words: "If you please."

The two most important words: "Thank you!"

The one most important word: "We"

The least most important word: "I"

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<sup>1</sup> Retrieved from: <http://www.peterstark.com/2009/human-relations/>

## H.1 How can state coordinators look at the variety of teaming and partnering efforts that are possible?

The six functions of the office of the coordinator found in Section 722(f) cannot be fulfilled without a variety of partnerships, coordination, and collaboration. In fact, half of the six functions use the terms coordination and collaboration. While state coordinators sometimes feel isolated as the only person in their state who fulfills these responsibilities, often they may long for a little “alone time” without the demands of multiple meetings, agency priorities, and diverse personalities.

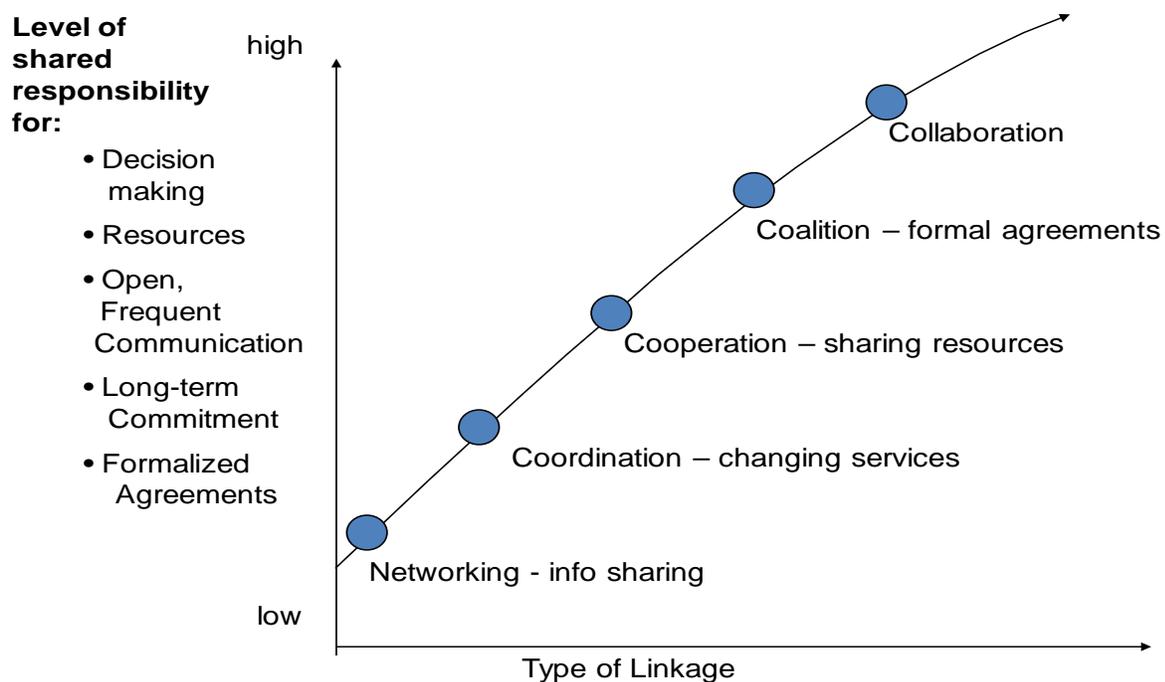
Frequently we use the term collaboration to describe a wide variety of partnerships and teaming efforts. Connections exist along a continuum from very loosely-structured relationships to highly structured and formalized ones. State coordinators will find the full continuum of structures in day-to-day work. Recognizing the possible connections and selecting the most appropriate level of involvement allows programs to be tailored to meet unique needs, resources, expertise, and interests. In the literature, the word “collaboration” suggests a highly developed, formalized system of sharing resources and responsibilities. The term “connections” has been selected throughout this section in an effort to avoid identifying a particular level of involvement. There are a variety of levels of interaction that can be adopted when forging links with needed partners. Hogue (1994) suggested six levels of connections can be identified ranging from loosely connected arrangements through highly formalized structures. Figure H-1 provides a graphic representation of the continuum. The following is a summary of these five levels:

- *Networking* offers opportunities for informal dialogue across different organizations to develop common understanding. Networking acts as a clearinghouse for information and requires low levels of leadership and minimal decision making.
- *Cooperation or Alliance* requires semi-formal links with the beginning of role definition. The purpose is to match needs and limit duplication of services while ensuring tasks are met. Leaders at the cooperation level should be facilitative due to the need for complex decision making in which some conflict may occur as needs and duplication are identified.
- *Coordination or partnership* requires formalized links with a central body of decision makers with defined roles. At this level, resources are shared to address common issues and to create

new resources. At this level, joint budgeting, frequent and clear communication, and group decision making are necessary.

- In a *coalition*, roles and timelines are defined and links have been formalized with a written agreement. All members should be involved in the decision making as ideas are shared and resources are reassigned from existing systems and well as generated by the group. A coalition generally calls for a commitment of at least three years with shared leadership and communication considered a priority.
- *Collaboration* requires a high level of trust, leadership, and productivity to realize a shared vision through the building of an interdependent system. Consensus in decision making, formalized work assignments, highly developed communication, and equal sharing of ideas characterize a collaborative relationship.

**Figure H-1. A Continuum of Connections**



Another way to look at connections is by the expectations for how people will work together. Bailey, Ross, Bailey, and Lumley suggest the following structures<sup>2</sup>:

- Committees have formal structures, with a chairperson and printed agenda that follows Roberts' Rules of Order including voting to make decisions. Examples would include the Special Education Advisory Council (SEAC) and Interagency Coordinating Council (ICC) found in the Individuals With Disabilities Education Act (IDEA).
- Groups share information, have limited common purpose, and are directed by a supervisor or outside leader to achieve specific tasks. Examples would be a group of stakeholders brought together to participate in strategic planning around a statewide grant, or a group brought together to review the state's special education benchmarks for its state improvement plan. A state coordinator may be asked to participate in strategic planning for the state's family life education grant from the Center for Disease Control, or to be a stakeholder in the creation of the state's performance plan for its early childhood special education program.
- Teams have members that share considerable information, have clearer sense of purpose and goals, share leadership roles and are committed to operating over a long period of time. The Florida Homeless Education program conducted a comprehensive needs assessment of their statewide program over a number of months in 2007. Some attendees at meetings changed, depending upon the purpose of the meeting, but a core committee held ownership for identifying needs and creating a plan that could be realistically implemented. The Keeping Maine's Children Connected initiative discussed in Section B is an example of long-term commitment. With greater sophistication, teams can be categorized as high performance teams or technology-based teams. (For more information on these specialized team structures, see Bailey, Ross, Bailey, & Lumley<sup>3</sup>).

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<sup>2</sup> Bailey, G.D., Ross, T., Bailey, G. L., & Lumley, D. (1998). *101 tips, traps, and to-dos for creating teams: A guidebook for school leaders*. National Educational Service.

<sup>3</sup> Ibid.

## H.2 What are the elements of successful connections?

As state coordinators, legislative mandates must be considered. Appendix H-1 summarizes partners with whom state coordinators must work. However, the level of interaction can be shaped to keep the work manageable. When deciding which connections to pursue, expand, discontinue, or limit, think about the following conditions. Successful connections require dissimilarity among the participants. ***What are the unique skills, knowledge, and resources that each partner brings to the table that the other partners need?*** This dissimilarity gives you a reason for working together and can help shape your goals. Related to this condition is the likelihood of mutual satisfaction. ***Will all the participants benefit from the effort to work together?*** Without mutual satisfaction, some participants will be less likely to remain involved. Some required partnerships are with programs for which homelessness or education are very tangential issues. You are likely to find sitting through multiple education meetings that never mention the word homeless or housing meetings that never use the word education very discouraging.

Furthermore, bring these questions to the meetings. If this conversation has not occurred, you are probably not the only one who will benefit from the discussion.

Success is also dependent upon the qualities of the participants. It often comes down to the personalities of individuals. Qualities that should be present include selflessness, commitment to the goals of the partnership, mutual trust and respect, flexibility as goals are clarified, and willingness to take risks. These may be natural qualities among some individuals, but trust, respect, commitment, etc. need intentional time to nurture.

## H.3 What are some tools to enhance connections?

People skills and organizational skills both come into play when we need to work with others. Some tricks of the trade follow.

### H.3.1 What are some critical communication skills to practice?

Effective communication is critical to successful teams. Three key skills are **constructive assertiveness, empathic responding, and problem solving**<sup>4</sup>. Often we jump to problem solving without clearly articulating the issues at hand and ensuring understanding of the different perspectives that exist. Therefore, it is important to use constructive assertiveness and empathic responding techniques before trying to solve the problem.

With constructive assertiveness the individual makes his/her wants/needs known. This is done by clearly stating the problem: identifying the behavior or issue in question and describing its effect. Being assertive means finding the middle ground being neither passive nor aggressive. This is accomplished by using “I” messages, avoiding labeling, and using body language with proper eye contact, posture and body orientation, and congruent facial expressions. Remember that nonverbal communication accounts for 60% of the message you communicate.

Empathic responding solicits and affirms the viewpoint of another person. This is done with the use of listening skills and processing skills. Listening skills acknowledge the feelings and ideas of the other person through nonverbal behaviors such as nodding, eye contact, and posture and through verbal remarks such as, “I see, go on, that’s interesting.” These behaviors communicate that you care about the other person and his/her ideas. Processing skills allow you to confirm or clarify your perceptions. This is done by repeat or summarizing what has been said. Again, this demonstrates that you were really paying attention to the other’s words. It also gives the other person an opportunity to correct any misconceptions by re-explaining if the original explanation was not clear. If the issue is an emotional one, it may give the other person a first glimpse at a more objective view of the issue.

The order of these two techniques can vary based on the situation. If you have an issue you feel needs to be addressed, constructive assertiveness would be first; if you sense another’s concern and want to unpack that issue, empathic responding may be a more appropriate starting point. To see these skills in action, you may enjoy a video clip found at: [here](#).

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<sup>4</sup> Evertson, C. M., Emmer, E. T. (2009). *Classroom management for elementary teachers* (8<sup>th</sup> ed.). Needham Heights, MA: Pearson/Allyn & Bacon. See especially Chapter 8.

### A few word tips:

#### Avoid “but” – use “and.”

I heard a rumor that the conference was being canceled **but** no one told me what was going on. This conference really requires us to stay in touch **and** if there is a possible change, let’s make sure everyone hears about it.

#### Replace “should” with “next time,” “in the future,” “from now on.”

Everyone **should** print their agendas and bring them to the meeting.

**In the future**, please print your agenda. We won’t make copies to avoid wasting paper.

There are a variety of problem solving processes. All involve clearly identifying the problem, brainstorming and evaluating possible solutions and selecting one or more to be implemented. Figure H-2 describes one example, LACE. Readers are encouraged to visit the [Mind Tools](#) website which has a rich variety of tools for problem solving, leadership, time management, decision making, etc.

### Figure H-2. A Problem Solving Process – LACE

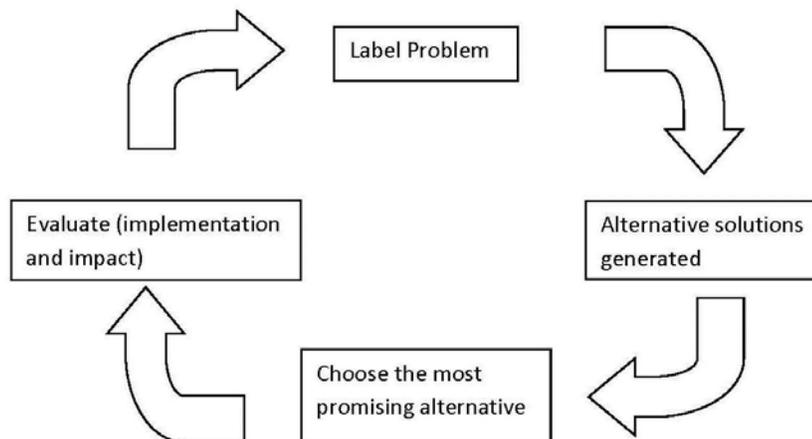
L – Label the problem (and decide what success would look like)

A – Alternatives are generated to resolve the issue

C – Choose the alternative that seems most promising

E – Evaluate the effectiveness of the alternative chose (Did you implement it faithfully? If so, did it work?)

The process is not linear. You can cycle through the steps until the evaluation shows the goals have been met. If the evaluation was not positive, go back to “L”: Did you frame the problem clearly or do you need to refine it? Are there other alternatives that might work you did not think of before? What alternative should be tried next? Did it work?



### H.3.2 What should state coordinators know about the stages of group formation?

It is helpful to recognize that there are stages in the creation, development, and possible dissolution of teams. Table H-1 lists the stages of group formation and offers activities to assist leaders in nurturing effective teaming.

**Table H-1: Leadership Activities at Different Group Formation Stages<sup>5</sup>**

Stage	Activity
<b>Forming</b>	Direct the team clearly. Establish objectives clearly (perhaps with a team charter ( [on line you can click on] an article on Team Diagnostics, which gives more information on these.)
<b>Storming</b>	Establish process and structure, and work to smooth conflict and build good relationships between team members. Generally provide support, especially to those team members who are less secure. Remain positive and firm in the face of challenges to your leadership or the team's goal. Perhaps explain the "forming, storming, norming and performing" idea so that people understand why conflict's occurring, and understand that things will get better in the future.
<b>Norming</b>	Step back and help the team take responsibility for progress towards the goal. This is a good time to arrange a social or team-building event
<b>Performing</b>	Delegate as far as you sensibly can. Once the team has achieved high performance, you should aim to have as "light a touch" as you can. You will now be able to start focusing on other goals and areas of work
<b>Adjourning</b>	When breaking up a team, take the time to celebrate its achievements. After all, you may work with some of these people again, and this will be much easier if people view past experiences positively.

### H.3.3 What can state coordinators do to conduct effective meetings that enhance team building?

Disorganized meetings not only waste time, they can dampen the commitment and energy of even the most avid supporter of an issue and zap the willingness of participants to remain

<sup>5</sup> Reproduced with permission from: [http://www.mindtools.com/pages/article/newLDR\\_86.htm](http://www.mindtools.com/pages/article/newLDR_86.htm).

involved. Bailey, Ross, Bailey and Lumley<sup>6</sup> propose the following steps be a part of all meetings that require true teaming to meet their goals.

1. **Set an agenda.** Set clear expectations for the goals of a meeting and estimate time to be allocated to avoid spending too much or too little time on items.
2. **Assume team roles.** Rotating responsibilities among members enhances the sense of shared leadership.
3. **Initiate whip activities.** Use a brief exercise to build relationship and set the stage for team productivity. Ice breakers would fit in this category.
4. **Monitor verbal and nonverbal behaviors.** Hold each other accountable for identifying, controlling, and modifying behaviors that affect team communication.
5. **Initiate fishbowling.** Having a closure activity to analyze the team's performance, celebrate successes, and identify challenges sets the state for continued growth at future meetings.

For an example of these steps in action, go to Appendix H-2 Early Childhood Priority Project Agenda and Minutes Template.

#### **H.3.4. How can state coordinators evaluate the effectiveness of their partnerships?**

When there are clear goals and teams will continue to work together, taking the time to openly discuss the effectiveness of the participants' efforts and the processes being used is a common characteristic of high functioning teams. If the meeting steps listed above are followed, evaluation will be a part of every meeting. A targeted assessment of team effectiveness may be used when there is a shift in team membership, new projects are being introduced, or you have the luxury to conduct a retreat with greater time for participants to reflect on their work. The evaluation may be as simple as asking participants to identify what you do well together and what could be done better. Another example of an evaluation tool can be found at this [team effective assessment](#). If you are working with an outside facilitator, the consultant should be able to offer a variety of tools to gain participant insight.

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<sup>6</sup> Bailey, G.D., Ross, T., Bailey, G. L., & Lumley, D. (1998).

***Choose your battles wisely...***  
***(Is it better to be right or in relationship?)***

1. Is it trivial?
2. Is it a persistent concern?
3. Is the behavior innocent or intentional?
4. What's the history or context of the situation?
5. Can or will their behavior change?
6. Is this good timing?
7. Ask yourself, "How am I contributing to this?" In response to complaints... ask yourself, "Is what they are saying at least partly true?" Begin your response with, "You're right about ..."
8. Would confronting this person result in a short-term win and a long-term loss?

**H.3.5 How do state coordinators decide which partners and to what level?**

Appendix H-3 is a planning tool to look at current partnerships in place in your state. If participation is mandated, reviewing the legal requirements will help you determine what needs to occur. (You may wish to use Appendix H-1 as a starting point for this activity.) Conduct an environmental scan by answering the following questions that provide data to decide which partners and to what level you can/must participate. While the first question addresses legal requirements, the remaining questions can be used for any efforts that require you to work with other partners.

- What does the law require?
- How will I participate? How much time is required? (for e.g., face-to-face meetings, conference calls, email correspondence)
- What level of interaction during and between meetings is required? (information sharing, sharing resources, leading initiatives, extensive participation in planning and executing initiatives)
- What level of participation is likely to be most effective based on identified goals for the state's EHCY program?
- What is my organization's level of commitment to this partnership?

- Can I delegate my representation?

In addition to these questions, consider:

- What additional tables need a homeless education voice?
- Are there “tables” where I serve under a different role that would benefit from a homeless education voice?”
- Do additional “tables” need to be created? Be sure to look carefully at your existing “tables” before considering a new endeavor. With limited time, using existing structures that are working can produce more immediate results.

#### Coordinator-to-Coordinator

Good leaders are good story tellers, and state coordinators love to share their stories! Read about three colleagues and their ventures into collaborations that made a difference for students experiencing homelessness by:

- Developing a state advisory board (Appendix H-4)
- Establishing a close working relationship with Head Start (Appendix H-5), and
- Creating links to higher education (Appendix H-6)

#### **H.4 How can state coordinators encourage local liaisons to develop collaborations?**

Developing cross-program and cross-agency collaborations require significant time along with knowledge of specific strategies to make collaborations productive and sustainable. Local homeless liaisons who are new, who have very little time allocated to homeless education duties, who do not see the value of collaboration, or who are unfamiliar with collaborative strategies will need the support and guidance of the state coordinator to initiate both LEA program collaborations and community collaborations.

There are five main reasons that state coordinators may provide to their local liaisons to urge them to collaborate:

1. Collaboration is one of the responsibilities outlined in the McKinney-Vento Act. Section 722(g)(5) states: “(A) Each local educational agency serving homeless children and youths that receive assistance under this subtitle shall coordinate (i) the provision of services under this subtitle with local social services agencies and other agencies or programs providing services to homeless children and youths and their families, including services and programs funded

under the Runaway and Homeless Youth Act; and (ii) with other local educational agencies on interdistrict issues, such as transportation or transfer of school records.” Moreover, the law requires coordination and collaboration with Title I in determining the amount and use of the Title IA reservation of funds for homeless students.

2. Federal monitoring requires that states oversee the implementation of the McKinney-Vento Act in all LEAs, including those without subgrants. Therefore, state coordinators should include monitoring indicators specific to LEA collaboration. If an LEA interviewed does not have any collaborations in place, ED will bring it to the attention of the SEA and it may receive findings or recommendations to improve.
3. Collaboration makes the work of the local liaison more effective to the extent that he or she can call on community collaborations to provide services to homeless families. Such collaborations also assist identification efforts.
4. Collaboration is a means of obtaining resources and funding for homeless children and youth. One of the most critical collaborations is between the McKinney-Vento and Title I programs. Local homeless liaisons should work closely with the local Title I coordinator to determine the amount of the homeless set aside and ways in which the set aside should be spent.
5. Collaboration can result in policies and procedures that clarify the roles and responsibilities of each agency. For example, LEAs should work with their child welfare agencies to develop an understanding of the phrase in the McKinney-Vento definition “awaiting foster care placement” because processes by which children come into care vary greatly from locale to locale. Also, interdistrict issues can be resolved before conflicts arise, such as determining how two LEAs will share responsibilities for transporting homeless children and youth to and from their school of origin.

#### **H.5 How can state coordinators assist LEAs with collaborations?**

State coordinators must model collaboration at the state level (“walk the walk”) as well as nurture local collaboration (“talk the talk”).

1. State coordinators can expand state-level collaborations to provide support for similar collaborations between the LEA and other local-level agencies. For example, state-level

collaborations in the area of Head Start can result in joint policies or MOUs that assist both Head Start programs and local homeless programs in coordinating their work. Similarly, cross-program collaborations within the SEA (such as Title I, Part A, migrant education, IDEA, and transportation) can develop state policies or guidance memos that clarify how these programs should collaborate at the LEA level.

2. State-level collaborations can facilitate joint training opportunities in which state-level staff in both the homeless education program and other programs can train each of their local staffs to familiarize them with one another's programs as well as bring them face to face to begin conversations.
3. State coordinators can include requirements for collaboration in their McKinney-Vento subgrant applications so that LEAs that have active collaborations are more competitive for funding. Many states require that subgrant applicants include information on the coordination between Title I and homeless programs in assessing needs of homeless students and determining the amount of the Title I, Part A reservation of funds.
4. State coordinators can provide training to local liaisons on ways that they can initiate and sustain collaborations. Appendix H in the [LEA Toolkit](#) provides some worksheets that could be utilized at a training of local liaisons to help them identify potential collaborators and develop an action plan. In addition, the NCHIE website includes a variety of documents to assist with collaboration in its Information by [topic section](#).

## **H.6 How do state coordinators collaborate with each other?**

Even though such collaborations are not mandated, state coordinators find regional collaborations with their colleagues are an important example of collaboration and working smarter. Here are some thoughts from regional collaborations.

- Northwest (OR, WA, ID): Partnership began as a conversation between the state coordinators in OR and WA. WA was already doing collaborative work with Idaho regarding cross-border issues. OR and WA worked together to form the local arrangements committee for the 2007 NAEHCY Conference.

- South (LA, AR, TX, MS, AL, TN): Originally, the LA state coordinator invited the TX coordinator to get together. The coordinators thought similar issues would allow learning from each other. A formal seminar is held every spring and a training every fall. The location changes annually from state-to-state and subgrantees are required to attend.
- New England (ME, NH, VT, RI, CT, MA, NY): The team began when CT called the Education Development Center (EDC). EDC facilitated the collaboration and structured the early meetings. The collaboration has become a think tank for issues shared among the states. They feel a collaborative approach gives strength in numbers. They have created a joint publication and devised a toolkit for training. These states will give other states training if necessary. They also review each other's subgrant proposals.
- West (AZ, CA, CO, HI, NM): Opportunities to meet regionally are offered during state coordinator meetings held in DC and at the annual NAEHCY conference. The western states found this time exciting and meaningful and maintain regular conference calls to discuss common challenges, cross state issues, and to share resources.

#### Key benefits of state coordinator collaboration:

- Sharing different perspectives and approaches can help with disputes and crises that arise.
- Supporting local liaisons: if one state coordinator is unavailable for assistance, local liaisons can call another state coordinator within the regional partnership.
- Establishing new relationships: local liaisons often establish collaborative relationships through meeting at regional trainings.
- Addressing inter-state issues.

#### Suggestions for building interstate collaboration:

- Attend other states' training sessions to get ideas.
- Start small and add other states when the interest arises. Distance limits who can participate, but conference calls and distance meeting technologies may change these limitations.
- Invite new state coordinators who have many questions to strengthen collaborations.

## H.7 Links to helpful documents

Additional NCHE publications on collaboration:

[\*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\*](#)

**Appendix H-1. Connections to Consider**

<b>Required</b>			
<b>Partner</b>	<b>Vehicle for Participation</b>	<b>Legal Citation</b>	<b>Type of Structure</b>
Title I, Part A	Unspecified	MV, and Title I	Unspecified (however, there should be documented evidence of coordination)
Special Education	State Special Education Advisory Committee	Individuals With Disabilities Education Act (IDEA), Part B	Committee
Early Intervention	Interagency Coordinating Council	IDEA, Part C	Committee
Head Start	Head Start Collaboration Project	MV and Head Start	Unspecified
School Nutrition	State policy and procedures must be in place to ensure categorical eligibility for free meals to homeless students	Child Nutrition Act	Unspecified
EDFacts/CSPR Coordinators (Data Stewards)	State structure for completion of the CSPR	MV (in order to fulfill data request, this coordination is needed)	Unspecified
HUD	Interagency Coalition on Homelessness	Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act	Committee
<b>Common</b>			
<b>Partner</b>	<b>Activity</b>	<b>State Examples</b>	
Title I, Part A	Joint trainings, state coordinator reviews reservation and plan for coordinating with MV in Title I application; shared monitoring of LEAs	New Hampshire Oregon	
State Homeless Coalitions	Homeless Education can be a strand at a broader statewide conference on homelessness. If your state coalition has a newsletter, include education articles and distribute to educators rather than creating a separate newsletter. State coordinator is part of ten year plan to end homelessness	Florida  Texas Homeless Education Office (THEO)  Kentucky	
Shelters	Have a point of contact for educational issues at family and UHY shelters. Include these contacts in	Virginia’s Child Services Coordinators	

	communications and trainings. Offer homeless education trainings at shelter sites that have such capacity so educators have an opportunity to visit such sites.	were model for changes in HEARTH
Pupil Transportation	Funding was available to provide school of origin transportation and conduct a study of impact.	Washington State
Regional State Coordinator Teams	Hosting regional/national conferences; liaison trainings, sharing policies and procedures, addressing border issues; reviewing each other's subgrant proposals, mentoring new coordinators	Northeast West South (see Section H.6)
<b>Less Common/Emerging</b>		
<b>Partner</b>	<b>Activity</b>	<b>Examples</b>
Higher Education	Outsourcing of state M-V administration	THEO – University of Texas-Austin Project HOPE-Virginia – The College of William and Mary University of North Carolina-Greensboro
Higher Education	Contracting data collection Contracting training Contracting external evaluations or research projects	South Carolina  Vermont
Financial Aid Administrators in higher education	Collaborative training, strategic planning led to the identification of liaisons on college campuses to assist with the transition from K-12 to higher education.	Colorado
Student Assistance Programs (SAP)	Joint training for McKinney-Vento Liaisons and SAP teams to introduce SAP teams to McKinney-Vento and explore the application of SAP to supporting students experiencing homelessness.	Virginia

**Appendix H-2. Meeting Template**

The following meeting agenda and minute templates are used by the Virginia Early Childhood Priority Project (ECP). A yearly schedule of meetings and rotating role assignments is prepared for members. In addition to pre-identified agenda items, members brainstorm additional items that need to be addressed and estimate the amount of time required to complete each item. The members always begin with celebrations (personal and professional) and announcements and often revisit their effectiveness as a team as part of the closure<sup>1</sup>.

Meeting Agenda  
Date

**Facilitator:** assign

**Recorder:** assign

**Timekeeper:** assign

Item or Issue	Action	Time	Person Responsible
Celebrations			
Announcements			
Review past meeting notes, process observations			
Item			
Meeting Debrief or “check out”			
<i>Prioritize Issues</i>			
<b>Total Amount of Time Needed:</b>			

<sup>1</sup> Reprinted with permission of the ECP.

## Team Meeting Notes

Location: \_\_\_\_\_

Time: \_\_\_\_\_

Date: \_\_\_\_\_

### Team members present:

Via phone:

Who will give handouts to and update each absent team member? \_\_\_\_\_

**Team roles:** (the specific roles used may vary by team needs; roles are rotated among members)

Facilitator \_\_\_\_\_

Co-facilitator \_\_\_\_\_

Timekeeper \_\_\_\_\_

Encourager \_\_\_\_\_

Recorder \_\_\_\_\_

Process observer (for fishbowling)

Other \_\_\_\_\_

### Celebrations: (whip activity)

### Announcements:

**Review of past meeting minutes, process observations:** (Record responses, comments, corrections.)

**Current agenda items:** (List here.)

Carryover items and other agenda items for next meeting:

_____	_____
_____	_____
_____	_____

**Next meeting:** Location: \_\_\_\_\_ Time: \_\_\_\_\_ Date: \_\_\_\_\_

Agenda item:

Discussion:

Task:

**Persons responsible:**

**When needed:**

**Appendix H-3. Evaluating Current Arrangements**

At what tables am I expected to participate?	How effective is the current arrangement? <ul style="list-style-type: none"> <li>• What do I bring to the table that other participants need?</li> <li>• What do I need from the other participants?</li> <li>• How will the time I spend with these programs enhance the lives of children and youth experiencing homeless?</li> </ul>	What should happen next? <ul style="list-style-type: none"> <li>• Maintain?</li> <li>• Refine? (expand, limit, change)</li> <li>• Dismiss</li> </ul>	Looking at outstanding needs, who needs to be added to these current tables?

## **Appendix H-4. Creating a Statewide Advisory Board**

### **Brenda Myers, South Carolina State Coordinator**

I became the state coordinator shortly after the last reauthorization of ESEA in 2002, so I inherited an approved state plan. One of the items proposed in the state plan was the creation of a statewide advisory board. Since I wasn't in the role when the plan was written, I'm not sure where the idea for the board originated. One of the first steps we took was to develop a comprehensive list of all the agency heads that might need to be included. An invitation was sent to the agency heads as an official request from our state superintendent which gave it more clout than just coming from me. People accepted, declined, or provided an alternate person to participate. We had about 22 agencies involved with 30-34 people at the table. We had representation from the University of South Carolina, Department of Health and Environmental Control, South Carolina Housing Authority, the United Way, faith-based organizations, the Red Cross, Department of Juvenile Justice, HUD Continuum of Care, Veterans Administration, Department of Mental Health, Department of Health and Human Services, Department of Social Services, early childhood and Head Start, Hispanics Connections, Pupil Transportation, Title I, Special Education and School Nutrition. Later, we added law enforcement. I also had six homeless liaisons – two with subgrants and four without grants. Since I worked more closely with my subgrantees, I had a pretty good idea about what they would say. I wanted more nongrantees to add a voice I didn't know as well.

I never had less than 25 people at a meeting. We met quarterly, and our meetings were a full day with lunch provided. We met at a building that had no food, so I could justify providing a nice lunch, not just a box lunch. At the first meeting, I provided an overview of McKinney-Vento and set the purpose of the board. We identified the big needs at that time which were immediate enrollment, school selection, Title I, transportation, and development of our dispute resolution. (Now the foci would be different; it would probably be unaccompanied homeless youth, Title I, transportation, and early childhood.) We divided into subcommittees for each of the initiatives, and I included a liaison on each. I facilitated the meetings but I didn't chair any of the subcommittees. There was a chair and vice chair for each, and they took

ownership for their charge. We would start each meeting as a whole group and update everyone, and then we would break out into the committees to do the actual work.

It really was not hard to start this initiative. It did save time because it brought all the players to me. Before having the board, I always had to invite myself to the table. After starting the board, things changed. There was more awareness, the Coalition president and our HUD staff knows who I am and they know I'll come, so they recommend me to be at other tables. Some great relationships came from this. For example, the Department of Juvenile Justice recognized that one of their problems was figuring out what to do when a youth was ready to leave but couldn't go home. I was able to help them connect with the shelters and group homes, so they got their needs met, too.

One of the hardest parts was deciding which agencies to include and how to involve key folks without having such a large group that it wouldn't work. Another major challenge was getting agency folks who had such a strong policy focus to see CHILDREN FIRST and keep the human focus. That was necessary to break down barriers and look outside the box for solutions.

We developed a state manual that offered guidance to our school districts and drafted forms that could be used across the state. When Hurricanes Katrina and Rita hit, we put the board on hold. By the time we were ready to reconvene, reauthorization was already being discussed. We've decided to wait for reauthorization to bring everyone back together.

Yes, it was worth it. I enjoyed listening to outside groups and how they saw the issue of homelessness. I was opening eyes!

## **Appendix H-5. Collaborating With Head Start**

### **Louis Tallarita, Connecticut State Coordinator**

The job of state coordinator is a challenge when you consider the range of children and youth who are homeless and the variation of needs associated. Similarly, serving in the role of state coordinator, specifically within a respective state education agency, it can seem somewhat isolating being the sole entity advocating for the diverse needs of children, youth and families experiencing homelessness. When the opportunity arises to involve other professionals in beneficial collaboration to expand both the awareness and the delivery of needed services, you grab it. A working collaboration between Head Start and McKinney-Vento was a clear fit considering the cross-over that exists in the target populations that each program is intending to serve.

Shortly after assuming the role of coordinator and soon after the reauthorization of ESEA, I was asked to serve on the statewide homeless advisory council that included the Head Start State Collaboration director. During our service to the council we met and began sharing information about our program efforts and finding ways to include each other in the planning and development of services to address the educational needs of young homeless children in Connecticut. Our collaboration began with offers to read one another's plans and proposals and developing cross-training events. Over the years, it has remained a stable collaborative effort and grown to include working together to fund and conduct a statewide needs assessment and developing small grant programs to improve local partnerships and increase enrollment of young children living in shelters into Head Start and other programs that meet their health and learning needs.

As a "part-time" state coordinator, collaboration items are likely to be some of the more difficult ones to accomplish. You are largely focused upon the more immediate concerns and less on long term goals and objectives that can ultimately improve systems; however, developing these important partnerships is instrumental to this work, so the time somehow seems to fit into your schedule when you plan accordingly, share responsibilities, and value the efforts that are being combined. I'd have to say that no specific challenges come to mind in the

way this partnership evolved, although I would have to point back to the “time” issue with competing priorities and a challenging workload.

It has absolutely been worth it. Not only I have I gained a partner, but also a friend and ally. We remain committed to a goal that all young children who experience homelessness arrive at the schoolhouse door, side by side with their housed peers, eager and ready to succeed. Even our small steps forward have led the way to stronger and more meaningful partnerships to assist families experiencing homelessness.

## **Appendix H-6. Collaborating With Higher Education**

### **Dana Scott, Colorado State Coordinator**

When The College Cost Reduction and Access Act passed in 2007, my liaisons began asking questions and saying things like, “What is a FAFSA? What do we do? Who do we contact in higher education and what do we say?” At the same time, I got a call from Misti Ruthven who works with College Invest, a division of the Colorado Department of Higher Education. Misti called because she was getting questions from higher education financial aid officers who wanted to know what this new “McKinney-Vento” requirement was about following the first Application and Verification Guide (AVG). It was something like, “You have your chocolate in my peanut butter; you have your peanut butter in my chocolate.” We had something special when we put our skills together. I invited Misti to talk at subgrant meetings and Misti invited me to her higher education meetings so we could give each group an introduction to the other’s work.

We started discussing how we could expand upon the partnership to bring these stakeholders together statewide and create a systemic way of helping to support successful transitions into higher education for unaccompanied homeless youth (UHY). We decided to invite McKinney-Vento homeless liaisons, representatives from higher education (in financial aid, admissions and student services), K-12 counselors, scholarship providers and homeless service providers to join the CO Taskforce on Higher Education for Unaccompanied Homeless Youth. During our first meeting with the group, one of the greatest challenges was helping the higher education folks get comfortable with being verifiers and understanding that they could do it. They were OK with using the other verifiers for independent student status listed in the legislation (homeless liaisons, shelter providers, and HUD or RHYA staff) but preparing them to make the determination when none of these people were involved with the student took a lot of work. We had to address jargon differences and provide sensitivity training to make sure the verification would be handled respectfully with youth. They needed to understand how really vulnerable some of these young people are. We realized we needed at least one person on each higher education campus who understood McKinney-Vento and would be willing to do the outreach for UHY. Now we have a single point of contact at every college and university in Colorado, which we have informally nicknamed our SPOCs (for Single Points of Contact) and more formally refer to as our

McKinney-Vento Higher Education Liaisons. SPOCs could be in admissions, student services, or financial aid. They not only take care of verification, but they help with the whole transition into college, as well as offer support throughout the college experience. It's amazing! We have teams of folks at the colleges and universities that have taken this work and run with it. They put together welcome baskets that have coupons for haircuts and movie tickets, along with basic necessities. SPOCs not only connect students with financial aid and admissions, but they also connect our students with housing services, tutoring, and FAFSA assistance for the next year.

Another challenge had to do with scheduling. Financial aid typically has days they meet with students, and students have to schedule an appointment on those days. If one of our students came by without an appointment or on the wrong day, they would be turned away. We have been able to help staff in these offices understand how difficult it could be for some of our youth to return and now they make an extra effort to try and assist the day the student comes to the office.

We developed a standardized process and form using the NAEHCY template which we modified a bit. It is used by liaisons, financial aid administrators, service providers and is recognized by all our SPOCs. Under FERPA, our liaisons are allowed to communicate with higher education; however, since service providers are bound by HIPAA, we added a signature line for youth to approve the communication between the provider and the college. Interestingly, the form actually became a barrier for a while. The financial aid folks were telling students they had to get the form completed, which actually put more work on the student. We added financial aid as a verifier on the form to reinforce the fact that they did not need anyone else to verify.

I don't know how we found the time; we just found it. I do have more gray hairs! We did 80 presentations/trainings across the state in 18 months. It does align with our work as state coordinators – it's about successful transition for our students and helping to further build the asset of education. While the collaboration may not save time, it certainly makes our work far more effective. Misti and I have received great participation. We both have strong relationships with our folks and saying "You really need to come!" has been enough to get involvement. I could not have done this work without my higher education partner. Public K-12 education and higher education have different cultures and ways of doing things, and this can, at times, cause tension,

and the jargon differences can lead to miscommunication. Misti and I helped each other understand when the differences surfaced and this allowed us to bridge and address those different cultures. Getting the liaisons and high school counselors to talk with each is another part of the collaboration. Now we highly recommend that our liaisons complete the form automatically whenever they identify an UHY. They keep a copy, give one to the student, and fax one to the high school counselor who is more likely to be in communication with colleges. It really has filled communication gaps and sped up time for successful FAFSA verifications.

The collaboration has created many new and exciting initiatives. Our SPOCs have given us feedback that has led to incorporating “tips from higher education” in our trainings. For example, they recommend that K-12 liaisons or counselors help youth set up email accounts and make sure the students always have their name written the same way on all forms. Sometimes our students have street names which may not match their vital documents; this has posed a big barrier to approving the FAFSA in the past. Access to vital documents was another barrier for our youth. Now we have a partnership with College Invest so there is a free web space where our youth can scan and store their documents, making it a lot easier to have what is needed in a convenient place.

We are starting annual trainings for our SPOCs and will be asking them what we can do to make the process better. For example, they have asked for a tip sheet to help them with asking the right questions in an interview to use for verification.

Was it worth it? Absolutely! It seems daunting looking back – we were flying the airplane while building it. Now we have food banks on campuses, dorms that are open on breaks so our students have a place to stay, welcome baskets, and a sincere message to our youth that, “We’re glad you’re here!” Peers are talking to each other and spreading the word about this work. Now there is at least one person on each campus. Early on, I got a call at 3:45p.m. about a college student who was going to be evicted from her residence hall at 5:00 p.m. because her financial aid was delayed due to lack of parent signature. Everyone knew that going to a shelter would not be good for her. I told the liaison to contact the SPOC at her university. Once they connected, they were able to postpone the eviction and work out a process so the student could sign the FAFSA for herself. Events like this make it all worthwhile. Two years ago, I had a college student transferring

from a Colorado college to Texas A&M. She was having a hard time getting the new school to work with her (the law was just starting to be implemented). I was able to share the AVG with school and explain the process, and I copied our Texas state coordinator, Barbara James, to keep her in the loop. The school took the information and ran with it. The student was SO appreciative, and I did very little – she was the self-advocate. That was one of my best days on the job!

This collaboration was one of the best things that has happened! Having a passionate partner in higher education is a vital component. The extra time all of us put in made it work. One Colorado school district has had a greater percentage of their UHY graduating and go on to college than the overall district's percentage – and their overall rate is strong! Liaisons and SPOCs can really be champions for UHY in a tangible realistic way and show that college can be a reality. They can be the “caring, supportive adults” that our students talk about who make all the difference in opening up doors and helping to navigate systems that can be daunting for all of us.

## **Section I. Taking a Regional Approach to Awarding McKinney-Vento Subgrants: Advantages and Challenges of Implementation**

### **I.1 Purpose, background and introduction**

The purpose of this section of the handbook is to provide information and “food for thought” for State Coordinators who might be considering a move toward a regional approach to awarding McKinney-Vento subgrants, or perhaps strengthening such efforts already underway. This approach includes states that disburse subgrant funds to established regional educational entities, geographical clusters of LEAs defined by state demographics, occasional clusters self-selected by neighboring LEAs, or some combination of these arrangements. This handbook section will highlight successful components of a regional approach, as well as common challenges and lessons learned.

This handbook section flows from surveys and conversations with State Coordinators who are implementing a regional approach, regional coordinators/directors, lead liaisons, regional leads, and other key stakeholders in the regional structure. Information was gathered from State Coordinators, regional coordinators, lead liaisons, and regular LEA liaisons through a combination of questionnaires, email requests, and informal conversations via phone and in person. Additional informal conversations with other stakeholders also contributed to the information gathered in the preparation of this handbook section. NCHIE acknowledges the participation of State Coordinators and other homeless educators and advocates in the following states: California, Colorado, Michigan, New Jersey, New York, Ohio, Oregon, Pennsylvania, Texas, Virginia and Washington. These states vary in their implementation of a regional approach; each state is unique in its combination of program components and in its delineation of roles and responsibilities assigned to ensure compliance with the McKinney-Vento Act.

The most apparent advantages are wider outreach, better collaborations and improved identification and data collection. It has been both exciting and fulfilling to be a part of this model and to train and provide outreach to underserved areas. I can't express strongly enough how much in favor of this concept I am. (State Coordinator)

Good collaboration is time-consuming but well worth it in the end. (Lead Liaison in large region)

Additional responsibilities of local liaisons with no additional funding, and inadequate amount of time (FTE, full time equivalent) allocated to the liaison position results in “too much work for too few people”. (Local liaison participating in regional/consortium arrangement)

## I.2 Description of various approaches

The following broad descriptions offer an overview of the major differences in implementation of a regional approach to awarding McKinney-Vento subgrants. Each description is an attempt to represent the program features selected as appropriate by one or more states in their efforts to build the most effective state-wide program possible with limited McKinney-Vento funds, based on unique characteristics of each state. It is clear that there is no one method in effect among the states under review. Each of the following types represents a composite view of the variations in program structure. Program components and features across participating states are detailed, along with the most commonly cited advantages and disadvantages in following sections of the document.

**Composite Type 1:** Awards are based on an existing regional state structure, with all LEAs covered in some measure by the McKinney-Vento regional subgrant awards. The state is divided for administrative purposes into 10 educational service districts, defined by geography and population centers. While individual LEAs may apply for subgrants, the state encourages these educational service districts to apply for and use McKinney-Vento funds to ensure service to all LEAs in their region. The primary rationale or benefit of this approach is ensuring that ALL LEAs are covered in some measure by McKinney-Vento services and supports. One potential question for consideration would be, if an individual LEA chose to apply, would it be eligible for an individual subgrant when also included in a regional subgrant project?

**Composite Type 2:** The state has established regional service centers for purposes of implementing all educational programs. These regional units are offered the option of applying for a McKinney-Vento subgrant, with the expectation that all LEAs within their region will benefit from the use of McKinney-Vento funds. Most regional service centers do apply for a McKinney-Vento subgrant, but some do not. Individual LEAs are also eligible to apply for individual district subgrant awards. This approach thus represents a combination of regional unit and single LEA grant awards. The application process requires each applicant to conduct a comprehensive needs assessment to determine and

prioritize the most pressing needs within the region or within the district. Funding decisions are based on prioritized needs, with guidelines for how funding can be apportioned to administrative costs, including salaries and benefits, relative to funding for direct services and supports. The primary rationale or benefit of this approach is that of local choice as to whether LEAs wish to implement a McKinney-Vento program independent of the regional entity with whom they are aligned. As with Composite Type #1, a potential question for consideration would be, “Would an LEA be eligible for an individual subgrant when also included in a regional subgrant project?”

**Composite Type 3:** The state has no regional administrative units; however, the SEA homeless education program requires the establishment of regional consortia or multi-county regional projects for purposes of McKinney-Vento program implementation. Since all applicants are required to establish a McKinney-Vento consortium, or regional project, individual LEAs do not apply as single units. These consortia are generally self-selected based on geography and local demographics, although they may be pre-determined by the SEA. Funding decisions are based on a combination of factors, including the numbers of homeless students identified, the number of LEAs represented in the consortium, and the rationale for program costs described in the proposed budget. The primary rationale or benefit of this approach is the building of collaboration and strengthening of partnerships, as this is required of all applicants. This benefit may or may not extend to all LEAs statewide, as there may be LEAs that are not participating in the application process.

**Composite Type 4:** Consortia are encouraged but not required. LEAs self-select into geographic groups or consortia, and develop shared services agreements between and among participating LEAs. These inter-district arrangements are primarily for coordination and delivery of services. The state has educational regions, but primarily for purposes of implementation of training and technical assistance rather than for administrative functions. The McKinney-Vento State Coordinator communicates regularly with the state assigned regional consultants to optimize the inclusion of McKinney-Vento training into professional development already planned for the region, maximizing state activity funds to support these training efforts. Some LEAs exercise the option of joining with neighboring districts within a given region to develop shared services agreements, building on existing partnerships within

region. Other LEAs choose to apply as a single LEA, especially when the size of the district supports a richer array of partnerships and existing opportunities for collaboration within district lines. In either case, all applicants are encouraged to utilize existing regional training events to provide McKinney-Vento professional development. More McKinney-Vento-specific technical assistance remains a function of the LEA liaison, or the consortia lead liaison as appropriate. Funding reflects numbers of homeless students identified as well as estimated costs of program functions. A primary benefit of this approach is the optimization of existing regional structures for professional development, maintaining the autonomy of each LEA to implement the McKinney-Vento program as a single district or as part of a consortium.

**Composite Type 5:** The current focus is that of starting slowly and moving gradually, using data and information gathered from key stakeholders as decisions are made regarding expansion of the regional approach. The state is in the first year of its plan to move toward regional awards, deliberately starting with small steps. The SEA currently awards most of the McKinney-Vento subgrants to individual LEAs, with three grantees serving as lead LEA and fiscal agent for their adjacent districts, forming three pilot regional groups. During the first year of implementation, the number of districts receiving McKinney-Vento funds increased from 20% to 60% of LEAs statewide, with plans to expand the regional model after assessing the successes and challenges of the pilot program. A primary benefit of this approach lies in the opportunity to get feedback from the field regarding the actual implementation of a regional approach, learn from the successes and challenges of the pilot year, and make adjustments in the model based on lessons learned. Another advantage of the pilot approach is that the formula for funding decisions can be modified gradually, so that existing grantee districts are not forced into abrupt changes in funding patterns without advance preparation and involvement in the planning process.

### **1.3 Common components of successful implementation by program function**

The following section addresses the various ways in which participating states delineate roles, responsibilities, and assignment of McKinney-Vento duties within the regional structure. Major responsibilities are listed in categories below, with notes reflecting the range of features/components,

and the range of concentration in where and to whom duties are assigned. Some states delegate to regional leaders some of the duties typically managed by the State Coordinator; others use the regional model to build the regional infrastructure and enhance local services and supports, leaving the State Coordinator role relatively unchanged in terms of core functions at the SEA. ***It should be noted that the SEA may reserve up to 25% of the McKinney-Vento allocation to support state level activities related to homeless education. If SEA responsibilities are delegated to regional and/or local activities, the SEA budget should reflect that appropriate additional funds, above the required 75%, are included in the subgrant award portion of the state allocation.***

As noted before, no two states are alike in their regional structure, least of all in how the statutory responsibilities of the SEA and LEA are combined, re-assigned, or kept separate in alignment with their original form as described in the legislative language. The program functions addressed here are common to all McKinney-Vento programs, regardless of how the SEA disburses available funds. The delineation of roles and responsibilities in a regional approach generally addresses to some degree the following program elements: 1) outreach and collaboration; 2) professional development, training, and technical assistance; 3) coordination and provision of support services; 4) policy and procedures and dispute resolution; 5) financial arrangements and oversight; 6) data collection; and 7) monitoring. It is noted that participating states vary on each of these components, especially in terms of the level of involvement of the State Coordinator and the extent to which these functions are included in the realignment of duties as part of the regional approach. These are indeed the core program elements that align with specific statutory requirements of all LEAs whether they are supported by a McKinney-Vento subgrant or not.

### **I.3.1 Outreach and Collaboration**

In a majority of participating states, outreach activities and collaborative initiatives are shared by LEA liaisons and regional coordinators or lead liaisons. This is generally considered to be a core responsibility at the local level, with regional leads providing training and support to foster local collaborative initiatives. Some SEAs list specific requirements as part of the regional structure to build regional collaborative initiatives in the delivery of McKinney-Vento services, with the inclusion of these collaborative activities in the job description of the regional coordinator or lead liaison. The State

Coordinator continues to engage in collaborative initiatives at the state level; however, the role of providing support to strengthen local initiatives is frequently assumed by the regional leads.

In the delineation of roles related to outreach and collaboration with community-based organizations and entities, the following categories are most frequently mentioned: 1) hosting, attending, and participating in community meetings and events; 2) disseminating information about the McKinney-Vento program to community agencies, advocates, and service providers; and 3) promoting and developing inter-agency collaborative initiatives. Some specific examples described by regional coordinators or lead liaisons providing regional and local support in participating states are discussed below.

- 1) Most regional coordinators or lead liaisons describe significant responsibilities related to participating in community meetings, events, and initiatives. Many report working closely with regional partners, serving as a member of local and regional collaborative groups, coalitions, provider forums, task forces, and committees. Most report serving as chair of one if not several committees and collaborative groups. A typical activity described is that of hosting meetings of community partners to build relationships to improve the identification of homeless children, youth and families, and strengthen their connection to services.

One real blessing has been improved involvement with HUD Continuum of Care meetings and initiatives. It's so much easier for a consortium representative to get involved on behalf of the regional unit rather than so many individual liaisons trying to participate.(State Coordinator)

- 2) Disseminating information about the McKinney-Vento Act to community agencies, advocates, and service providers is another frequently cited role of the regional lead. The development of listservs, distribution lists, websites, and other means of electronic dissemination of information to a wide community audience is often a primary and ongoing task of regional coordinators and lead liaisons. Depending on the number of LEAs in the region, this can often be a wide-ranging responsibility, and requires frequent monitoring to ensure that the intended recipients are receiving the information needed to build community relationships and strengthen collaborative efforts. These collaborative communications are critical to community education and awareness,

and can also trigger enthusiastic and ongoing response to requests for donations of various types to support homeless children and youth.

- 3) Regional lead responsibilities related to promoting and developing inter-agency collaborative initiatives range from simple routine communication to the actual brokering and development of binding agreements between and among districts and/or agencies to share in the delivery of direct services to homeless children, youth, and families. Examples of responsibilities include the following:
- a. Some regional leads collaborate with shelter providers and other community agencies to develop data-sharing agreements to improve data collection and reporting to the state. Data sharing between and among the various agencies in the community can often provide agencies with the kinds of hard data needed to submit credible and quality applications in response to various funding opportunities, especially when lack of accurate data can limit the success of an otherwise winning proposal.
  - b. Some community agencies work closely with schools and districts to provide data, allowing a comparison of numbers served by using community data to verify the accuracy of district numbers of homeless students identified and reported to the state.
  - c. Other cross-agency agreements include shared services, such as that of organizing and monitoring after-school tutoring programs, ensuring access and supplies for homeless students to attend and succeed.

The regional approach, taking responsibility out of small, limited sites and moving it to a more global perspective, has also improved our ability to network and collaborate with a variety of other entities, with combined resources for regional events. (Regional Coordinator)

### **I.3.2 Professional development, training, and technical assistance**

This particular SEA function is often considered one of the major responsibilities of the regional leads. Participating states vary widely on how much of the training and technical assistance role is shifted to regional leads and how much is maintained as a State Coordinator activity. Some regional coordinators assume full responsibility for professional development, while some share the

responsibilities with the State Coordinator. In some cases, the training is conducted primarily by the State Coordinator, with assistance from each regional lead in planning and logistics for each venue. Feedback on this program element highlights the critical need to address local capacity when assigning professional development responsibilities typically covered by the State Coordinator. When the duties rest with a full-time regional coordinator, project director, or lead liaison, this arrangement tends to work well. However, when such duties are passed along to liaisons with limited FTE, the availability of training and technical assistance required to ensure compliance can be difficult, burdensome, and in some cases impossible. As State Coordinators are acutely aware, adequate time and resources are critical to fulfilling the responsibilities of the role. If delegating training and technical assistance tasks is under consideration, it is imperative that time and resources are made available and remain in place for the regional coordinator to carry out the required professional development tasks.

As noted before, when SEA duties are assigned to regional or local staff, an appropriate percentage of state activity funds reserved by SEA should be included in the awards to regional and local fiscal units in support of this expanded role. The following examples represent the varying degrees of responsibilities assigned to regional coordinators and lead liaisons relative to the provision of training and technical assistance throughout the region.

- Some regional coordinators provide McKinney-Vento training for all district local liaisons, school personnel, parents, and community agencies. This intensive focus on training requires considerable attention to capacity, as this all-encompassing responsibility requires teamwork from a variety of sources, at a variety of venues. This level of responsibility on the shoulders of the regional coordinator works well only when there is significant participation on the part of the State Coordinator, and on the part of local liaisons in the school districts receiving the training.
- In some participating states, regional training is provided by the State Coordinator with assistance from regional coordinators for purposes of planning and logistics. This level of involvement is preferred by most regional coordinators, since the position of State Coordinator often carries a measure of authority not always enjoyed by those in regional or local roles. Regional coordinators often conduct any needed follow-up with local districts to ensure that individuals from all appropriate role groups have received the necessary training. This requires the development of some mechanism for tracking attendance at training events and identifying liaisons and other

individuals who need additional training. Some regional coordinators report that they routinely examine attendance records and make personal contact with each individual who missed the training event, or who needs additional training and updates. On the other hand, some regional coordinators state simply that the training is offered to all, but that they don't follow-up with non-attendees.

- Most regional coordinators develop a system of co-facilitating McKinney-Vento training in local schools and community settings. This often includes the development of a series of PowerPoint presentations and other training materials for liaisons to use in their schools and communities, and the provision of on-call technical assistance to liaisons who request help with training, either for large groups or for individuals who need to know more about McKinney-Vento. Training venues may include the availability of web-based training on the statutory requirements of the McKinney-Vento Act, customizing webinars to various role groups in the school community network. Materials may also include training for charter schools as appropriate.
- Training and technical assistance in some regions include conducting monthly or quarterly meetings of all liaisons to share strategies, best practices, resources, problem solving and case management, and to provide updates from the state and federal government. Many regional coordinators report meeting with liaisons to help build capacity at the LEA level to address policy development issues, targeting any specific barriers that need to be addressed and sharing tools and strategies for removal of barriers. Some regional coordinators report that they visit all school districts over the course of a year, including school sites, shelters, community agencies, coalitions, non-profits and churches to distribute posters, brochures, and other educational materials available from NCHIE. Many report maintaining a regional web-page, providing information on the McKinney-Vento Act, resources, sample forms, outreach materials, posters and brochures, and media presentation materials. Websites also offer current information related to liaison network and collaborative agency meeting dates and other information of common interest.
- Many regional coordinators gather data and information to assist in determining what the training needs are across their region and in prioritizing their training efforts. For example, some regional coordinators develop a spreadsheet showing multi-year identification trends across all districts in their region. The advantages of this spreadsheet include the identification of districts reporting low

numbers, comparison with available poverty data to judge the accuracy of numbers identified across LEAs, and use of the spreadsheet in training to generate discussion of identification procedures. Similarly, some regional coordinators develop a spreadsheet showing Title I allocations and set-asides relative to number of homeless students identified for each LEA in the region to determine whether further training is needed in some LEAs relative to Title I and McKinney-Vento coordination. This type of data analysis allows regional leads to identify LEAs that might benefit from targeted technical assistance to improve identification procedures or to verify accuracy of low numbers.

The regional model fosters collaboration with combined technologies, making outreach and data easier by having a common data collection source; districts with similar demographics can compare results. (State Coordinator)

### **I.3.3 Coordination and provision of support services**

The provision of direct services to homeless children and youth remains a core function of local homeless education programs, whether funded with McKinney-Vento dollars or not. The degree of management, oversight, coordination, etc. is an important issue that is addressed in the delineation of roles in a regional approach. The clarification of expectations, roles, and responsibilities for the provision of direct services is typically explained in the grant application criteria and included in the scoring rubric. Regional recipients often assume some of the LEA responsibilities, but usually at the level of providing training, technical assistance, guidance and support. Some regional leads organize county wide or regional events and initiatives, but direct services to homeless children and youth remain a core function of the LEA. Experienced State Coordinators advise that the LEA should indeed maintain ownership for its homeless students and their needs. Otherwise, there is the risk of assumptions within the LEA that certain responsibilities have been addressed by the regional coordinator, when capacity is limited and needs go unmet. Clear delineation of LEA and regional coordinator responsibilities is necessary in order to strengthen the infrastructure needed to support strong programs.

The following examples are described as typical activities of regional coordinators and lead liaisons:

- Most regional coordinators report that one of their main responsibilities is to oversee coordination and provide support for delivery of services to all homeless children and youth identified across the region. This is obviously a daunting task and typically involves the provision of daily assistance via phone, email, and site visits as needed; assisting with problem-solving; and serving as consultant, advocate, or case manager in finding solutions to service issues.

Not all regional agencies “are created equal”. Make sure the ones you are working with are not only in high need communities, but also have the capacity to ensure quality technical assistance and capacity building with the partner district. This is vital. If the regional agency does not have a quality McKinney-Vento advocate or the capacity to truly create results, these types of grants can quickly become bureaucratic grants that will not be effective for the partner districts. In those situations, the students are better served by funding provided directly to the districts. (State Coordinator)

- A primary function is the regional coordination of referrals of homeless children, youth, and families to appropriate resources as available.
- Most regional coordinators serve as the facilitator for addressing emerging issues, responding to questions, providing clarification of issues, and ensuring that the dispute resolution process is appropriately utilized for the protection of the rights guaranteed by the McKinney-Vento Act.
- Regional coordinators typically take the lead in the development of shared service agreements between and among school districts and community agencies to improve the array of services and supports available for homeless children and youth. Some report that they organize individual student assessments on all identified homeless students, inform school districts of needs, and assist if necessary in linking the student with needed services. In some cases, regional coordinators will access available regional funding to defray some of the related costs to districts. One example is the organization of tutorial assistance in area shelters across district lines with regional funds used in the provision of materials and supplies for educational supports in these tutoring settings. Another example is working with the regional liaison network to plan cross-district parent involvement activities and events.

### **I.3.4 Policy, procedures, and dispute resolution**

Policies and procedures at SEA and LEA levels have evolved over many years and in most venues provide strong support for compliance with the McKinney-Vento Act. Well-established policies and procedures notwithstanding, conventional wisdom holds that there will always be those occasional issues that require re-examination of policy or procedures to address barriers, or potential barriers, to full access and success in school for homeless children and youth.

States that are implementing a regional approach to McKinney-Vento sometimes charge regional coordinators with responsibilities related to the development and maintenance of LEA policies and procedures. The role of the State Coordinator in ensuring the removal of barriers from local district policies and procedures varies considerably among participating states. Most states maintain full responsibility for holding districts accountable for compliance while others have chosen a less involved or perhaps a “hands-off” role in compliance issues. Feedback from states, regions, and districts implementing a regional approach reveals some frustration when difficult issues arise with local districts and the role of the State Coordinator does not provide an avenue for further support for liaison decisions. This becomes especially critical in the dispute resolution process when the liaison decision is challenged by district administrators and “the buck stops here” rather than moving along to the State Coordinator for further review and resolution. It is imperative that the State Coordinator maintain accountability at the SEA level to ensure statewide consistency in the implementation of the dispute resolution policy as required by statute.

Any state considering going regional definitely needs to make sure there is strong support from the State Coordinator. State involvement is critical, and cannot be handed off to regional coordinators or lead liaisons. (Regional Coordinator)

The following examples of responsibilities related to policy and procedures represent the wide range of responsibility, authority and accountability assigned to regional coordinators.

- Most regional coordinators typically provide all district local liaisons with basic McKinney-Vento information and materials, such as copies of the Local Liaison Toolkit from NCHIE, state-specific information regarding the implementation of the McKinney-Vento Act, sample LEA policies, and useful templates for development of documents and tools. Regional coordinators often provide

liaisons with specific information outlining the responsibilities of LEA liaison, consortia lead liaison, and State Coordinator relative to regional and local expectations. These basic materials usually include information about the required reservation of Title IA funds and the statewide dispute resolution process outlining procedures and persons responsible at each step. The regional coordinator then provides on-call technical assistance to clarify issues and answer questions about compliance, policy and procedures. As questions or issues are addressed as common concerns, most regional coordinators find it useful to convene meetings of all liaisons to develop forms that are consistent across the region.

- Most regional coordinators report that they maintain a dispute resolution binder as a reference to any communications from liaisons and parents that might lead to a possible dispute. They then work with local liaisons and LEA administrators to resolve a pressing or emerging issue to avoid having it evolve into a full dispute. When issues cannot be resolved at the local level, or when local administrators do not support the decision made by the local liaison or regional coordinator, the role of the State Coordinator becomes critical. It should be noted that the importance of the state role in dispute resolution is paramount in the removal of barriers for homeless students when local decisions are not in compliance with McKinney-Vento law. Regional and local McKinney-Vento personnel are not always equipped with the power to enforce corrective action in compliance issues. States choosing to implement a regional model should take care to make necessary changes in both the state and local dispute resolution policies to ensure clarity in roles and responsibilities of all players in the dispute resolution process.

### **I.3.5 Financial arrangements and oversight**

Fiscal oversight of the regional subgrants is defined in the grant application and award process. This is usually accomplished by a grant manager employed by the fiscal agent, in combination with programmatic oversight by the regional coordinator or lead liaison. The primary source of variance in this process has to do with whether and in what amounts regional subgrant funds are further awarded to individual districts and how those arrangements are made. These decisions are influenced in large measure by how the regional award is apportioned according to administrative vs. programmatic needs and priorities. While some regional entities expend a majority of their award on salary of

regional personnel in support of their expanded McKinney-Vento roles and other administrative functions, most regional or consortia subgrantees, commit large portions of the subgrant award to the provision of direct supports to individual LEA programs and direct services to homeless children and youth. Finding the most reasonable and effective balance is one of the most common challenges as decisions about regional structure are made.

Regional coordinators or lead liaisons assume some measure of responsibility for awarding regional funds to individual LEAs, making informed decisions about the use of regional funds to support homeless students. They are responsible for overseeing the disbursement of funds and ensuring that expenditures are allowable and in line with the established plan. Examples include the establishment of a percentage of regional funds to be held in reserve for individual LEAs to draw down for school-based services to homeless children and youth, with assistance in the reimbursement process for districts accessing regional funds to provide local supports. This assistance often includes costs associated with identified needs, such as tutoring, supplies, materials, and other student-specific supports.

Some regional coordinators also address federal and state requirements for Title I collaboration, including the required Title I statutory requirement to reserve Part A funds. A variety of strategies are employed to ensure that each LEA is reserving Title I Part A funds according to established methods, and is using reserved funds appropriately as needed to support the education of homeless children and youth in the district. It is clear that in states or districts where this remains a challenge, the role of State Coordinator remains an important one in ensuring compliance with this federal statute.

Regional models are effective ways of leveraging resources, particularly in rural parts of the state where grant writing capacity and administration are often minimal. Through regional agencies, we have seen success in building liaison knowledge and improving district policies, practices and procedures for McKinney-Vento. Other results include increased identification numbers and increases in the level of Title IA set-asides budgeted and expended. I highly recommend this model of grant making! (State Coordinator)

### **I.3.6 Data collection**

It should be noted that most regional coordinators assume additional responsibilities related to the collection and recording of accurate data across their region, consistent with state and federal data collection requirements. Given the volume of data that must be collected, entered, analyzed and reported, especially in large regions, these tasks can become overwhelming if not built into the job description and clarified as expectations from the outset. It is also important to note that data collection tasks can be supported with McKinney-Vento funds reserved by the SEA for state activities. This is an important topic to be addressed in the planning phase for successful implementation of a regional approach for the implementation of McKinney-Vento programs. State Coordinators are advised to consider carefully what additional responsibilities might be assigned to regional leads and streamline expectations to the greatest extent possible. Another important consideration to address in the planning stage is that of data collection procedures that are not duplicative. For example, are numbers reported individually by LEAs collapsed into a regional data set before reporting to the state? Or does the SEA receive duplicative data from LEA and regional units? A final consideration is the importance of a review of all data already collected from LEAs by the state, understanding that there is no need to duplicate data collection efforts if data already stored at the state level can be accessed as needed for general data analysis and reporting purposes.

### **I.3.7 Monitoring**

Compliance monitoring of individual LEAs is typically planned and executed by the State Coordinator, a state-trained and designated monitoring contractor, a regional coordinator/lead liaison, or some combination of the above. Several participating states have assigned some monitoring activities to the regional coordinators, although most have reserved the overall accountability for compliance with McKinney-Vento as a state function, especially relative to the official monitoring site visit as a main monitoring event. While regional coordinators often gather and analyze LEA-specific data and other information, compliance monitoring is generally judged to be best handled with state authority, especially since corrective action is often better leveraged by the state than by local or regional monitors.

My agency, so many steps removed from the SEA, has to administer accounting and monitoring activities, without leverage to enforce compliance when local powers are not committed to McKinney-Vento. (Lead Liaison for group of LEAs within regional administrative unit)

The collection of accurate data on the various components of homeless education programs, whether a local, regional, or state level of focus, is often integral to the process of monitoring for compliance and for evaluation of program quality. Also integral to effective monitoring are an examination of evidence and review of data against the McKinney-Vento Standards and Indicators. An important piece of the larger monitoring puzzle is that of desk monitoring, which involves the examination of available data from local homeless education programs and initiatives. The data collection tasks are often shared by a variety of program personnel. States implementing a regional approach to awarding subgrants often take a regional approach to the assignment of data collection duties. Some typical monitoring-related activities assigned to regional coordinators include maintaining a database for each district in the region with demographics, student-specific information, services needed, and services provided. Regional coordinators or lead liaisons collect and report region-wide data to the SEA as required for federal reporting, prepare mid-year and final data reports, and aggregate data across all districts in region. Data collection often includes an analysis of free and reduced meals data for each district within the region to compare with numbers of homeless students identified and verify the accuracy of their numbers.

Participating states vary in their requirements for conducting needs assessments and program evaluation. In most cases these functions are supervised and guided by the State Coordinator. Some regional coordinators report that they assist LEA liaisons in conducting comprehensive needs assessments for their districts to determine gaps in services and ways to leverage all available resources. They provide guidance and assistance in data collection procedures at the LEA level, ensuring consistency with state and federal requirements.

#### **I.4 Advantages of implementation of a regional model**

Advantages reported by regional coordinators and other stakeholders generally cluster into the following categories: 1) coverage of more, or all, LEAs; 2) improved identification and better

coordination of service delivery; 3) enhanced communication, collaboration, and outreach among community agencies and entities; and 4) capacity building and growing leadership teams.

- 1) Participating states are unanimous in their citing the primary advantage of reaching more LEAs, thus supporting more homeless students with McKinney-Vento funded activities. States with an already established regional administrative structure report that they now have the ability to cover 100% of LEAs in some fashion. The degree of involvement of each LEA, or each county unit, varies according to need, but a higher involvement and awareness have been evident in all districts since implementation of the regional model. States that encourage consortia also note the coverage of more LEAs and larger areas of the state as an important advantage of the regional model. It is also noted that districts are held more accountable, with regional leaders bringing more McKinney-Vento focus to local programs.
  
- 2) Most participating states report better identification in local districts, resulting in increasing numbers of students identified as eligible for McKinney-Vento services. Several respondents describe more consistency in service delivery and program management when part of a consortium program as compared to a more fragmented availability of services when operating as individual district program. Stronger coordination of services between and among programs and agencies is often cited as an advantage, noting that this improvement gives districts more of a sense of purpose and recognition of the need to assist homeless students. Improved direct services and supports result in greater local commitment to recognizing and meeting the needs of homeless children, youth, and their families. In a regional subgrant, more districts are willing to work together and share resources. Additional funding often is available to enhance the ability of LEAs to provide direct assistance, school supplies, and other supports.
  - 1) Better communication, collaboration, and cooperative initiatives are often a direct result of the implementation of a regional approach to awarding McKinney-Vento subgrants. All participating states report improved communication and collaboration with community service providers and the community at large, noting strong, open correspondence and communications, and higher levels of trust between local school districts, county or regional offices, and state programs and personnel. Enhanced collaboration, improved efficiency,

reduced duplication of services and effort, and reduction in services gaps are noted as advantages, along with more cohesiveness and consistency in the delivery of services across the region. It was also noted that enhanced collaboration with community partners usually results in more successful efforts to address systems-level issues.

This model gives us a vehicle for supportive assistance, outreach, materials, resources, and education to help to continually build strong collaborative partnerships throughout the districts, schools, and community agencies. (Lead Liaison for Consortium)

- 2) In addition to the capacity-building features included in 1) above, most participating states have experienced enhanced capacity relative to teamwork in the management of McKinney-Vento program functions. Several State Coordinators reported positive changes in the growth of leadership within the ranks of program staff, and the emergence of more “leaders of the charge” in strengthening local programs. Local liaisons report advantages to their smaller districts in partnering with other districts for purposes of coordinated service delivery. Several respondents mentioned the power of teamwork in grant writing and the implementation of collaborative programs.

### **I.5 Disadvantages of implementing a regional model**

Disadvantages reported by a variety of key stakeholders generally cluster into the following areas of challenge: 1) accountability and authority issues, 2) capacity issues, 3) logistics, and 4) planning and preparation for change.

- 1) Regional coordinators or lead liaisons do not typically have the same authority with district superintendents and program administrators as that held by the State Coordinator. This can be problematic in districts that do not embrace the spirit of the McKinney-Vento Act and do not empower the liaison to make decisions on behalf of homeless students. Similarly, regional coordinators do not always have clout or leverage to request information from Title I directors, which can be problematic in districts whose Title I director does not fully embrace the requirement for Title I support for homeless education.

An additional concern regarding accountability that is worthy of note is one that exists in many LEAs, whether part of a regional approach or not, and emerged as a theme among participants in the preparation of this report. Accountability can sometimes become a problem in districts that assign McKinney-Vento duties to a superintendent, assistant superintendent, or director of another cost center, such as transportation. This sometimes results in built-in conflicts of interest in terms of cost considerations. Some districts designate superintendents or transportation directors as the local liaison, leading to apparent conflicts of interest in the identification process or provision of services, because there is less cost to the district if fewer homeless students are identified. While this happens in districts that are not part of a regional approach, this issue was reported in several instances by local stakeholders whose LEA administrators interpreted the regional approach to mean less responsibility at the LEA level, thereby justifying less support in terms of FTE for the liaison position. Reassignment of liaison responsibilities to other administrative units can compromise accountability if adequate training is not provided to those assuming McKinney-Vento tasks.

- 2) Lack of capacity appears to be the most pressing concern and the most often cited disadvantage of the regional approach. New duties related to the management of the regional initiative, such as training, monitoring, budget oversight, data collection, etc., result in less time for immediate, direct services. The additional paperwork required of regional coordinators or lead liaisons will typically result in less time to devote to networking and coordination of services in the field.

It's so important to maintain a proper perspective on the needs of the students, and how those needs can be met, when most of the state funds are used to support the regional infrastructure rather than going directly to the districts and schools. The regional structure for us has resulted in less time to devote to direct services, with increasing demands on the regional coordinators' time for administrative tasks. Any state considering this model should have a clear vision of how a few people will handle so much extra work. (Regional Coordinator)

Capacity issues also arise at the local liaison level as well, and are perhaps more problematic, as regional funding often does not trickle down to support the local liaison for the intense level of

services needed in some districts. While many services and program functions are greatly improved, many local liaisons often are reassigned with this model, leaving inexperienced people to replace them and requiring more training and follow up to continue to provide the needed technical assistance to staff new to the program. Many existing liaisons are assigned multiple, additional responsibilities with the expectation that the regional coordinator will take care of local district responsibilities. In some cases, liaison time is reduced but McKinney-Vento duties are expanded; some liaisons are assigned “mini-site” designation with less time allocated to duties, as some supervisors think regional structure lessens LEA responsibilities. If expectations are not well defined, the local liaison job description can change to the extent that McKinney-Vento responsibilities are impossible to cover. This has been noted as especially problematic when a reduction in local funding to current LEAs, with more financial support going to regional staff, is accompanied by increased responsibilities when a particular LEA is designated as having a lead role in the consortia or regional structure. Supervisors and other program administrators need to understand that the regional model is a vehicle for strengthening local programs, as opposed to lessening local responsibilities or opportunities to reduce FTE assigned to the McKinney-Vento program.

- 3) While the regional approach can be beneficial in providing coverage for large states or large geographic areas, there are inherent logistical challenges associated with serving large regions or large areas of the state. These challenges primarily concern the distance that regional leads must travel in carrying out their duties, leaving less time for actual delivery of services and supports. Long distance travel can be costly as well as time-consuming, requiring careful consideration of alternative strategies for communication and provision of training and technical assistance across the region. Another logistical concern comes when different districts within a consortium or region may operate with differing school calendar years.
- 4) Transition from a single district approach to a regional model can be difficult if sufficient time is not given to the planning process, ensuring the buy-in of key players. It is clear that key stakeholders in the field need input into decisions about the change process. This can be difficult to accomplish,

especially when decisions are typically made at the state level without input from the people who are most directly affected by the change. The regional or consortia model can result in significant changes in funding patterns and in the ability of local folks to control their own program. This can be perceived as a drastic change at local levels and can result in less than optimal implementation if changes are abrupt and lacking in local buy-in.

## **I.6 Lessons learned**

Feedback from a variety of stakeholders offers valuable advice on a range of topics, issues, and implementation concerns. Lessons learned by participating states can be distilled into three general categories: 1) planning for change and the importance of local buy-in before change occurs, 2) accountability and authority – who’s in charge, and 3) capacity of local and regional leaders to manage the assigned tasks.

- 1) As noted in the previous discussion of disadvantages, transition from a single district funding pattern to a regional model can be difficult if sufficient time is not given to the planning process. If existing grantees, local district liaisons, and program administrators do not have an understanding of the rationale for change and are not in agreement with the goals and desired outcomes of the new approach, the change process is compromised from the start. It is critical that key players understand how roles will change in advance of new system rollout and how those changes will affect them as individuals and as partners in the process. The new structure will mean that existing liaisons may experience drastic changes, loss of grant funding, loss of autonomy, loss of capacity, reduced FTE, etc. Advance planning that enlists their support, understanding, and involvement will minimize the potential ill effects of the upcoming changes. The planning process should include meetings in the field, focus groups, discussion forums, and opportunities to engage in dialogue that informs decisions about how programs will be operated differently. Dialogue should take place BEFORE changes go into effect. In short, plan ahead for casualties!
  
- 2) Most districts want to be in compliance, but there are the occasional few that are resistant and need leverage from the state to comply. Most people providing feedback stress the need to

preserve the strength of the SEA role, especially as related to accountability for ensuring that statutory requirements are met by all LEAs. Strong state support is needed for all regional program functions, but especially for financial oversight and dispute resolution. The optimal arrangement seems to be one in which the SEA maintains the final word, supporting LEA decisions and taking the heat when local administrators do not recognize authority of regional coordinators.

- 3) Capacity to accomplish assigned tasks is perhaps the most pressing of problems experienced by McKinney-Vento program personnel, not only at the regional coordinator or lead liaison level, but also at the local district liaison level. A regional model will work at its best when there is designated staff at ALL levels, with adequate time allocated to the accomplishment of assigned McKinney-Vento tasks. In some cases, it is observed that the FTE assigned to McKinney-Vento positions does not always match responsibilities. It is incumbent on regional program planners to consider carefully how decisions are made regarding assignment of McKinney-Vento duties and the capacity of local liaisons to carry out their responsibilities as required by law. Role expectations must be clear and supported administratively.

In summary, a decision to move toward a regional approach to the awarding of McKinney-Vento subgrants is one that requires careful consideration of a variety of factors. Compelling reasons to change from single district to a regional or consortia approach are abundant, but potential problem areas should be addressed well in advance of a final decision to make the change.

### **1.7 Some things to consider**

Any state considering the implementation of a regional approach to McKinney-Vento subgrants has the flexibility to choose any configuration of program components described in this document. The composites and types described are a representation of choices that were made to suit the unique characteristics and needs of individual states. None of the composites or types should be considered to be more or less desirable than the others; they represent the wide range of how the regional approach evolved for the participating states.

More importantly, careful consideration should be given to the advantages and disadvantages as described by state, regional, and local participants providing feedback for the development of this

document. The planning process should include careful attention to the following benefits and challenges of implementing a regional approach to awarding McKinney-Vento subgrants, regardless of the composite type followed most closely.

When determining whether or not to use a regional approach to McKinney-Vento subgrants, consider the potential benefits and challenges listed in Table I-1.

Table I-1. Potential benefits and challenges of the regional approach to McKinney-Vento subgrants

Potential Benefits	Potential Challenges
<ul style="list-style-type: none"> <li>• Possibility of reaching all LEAs with grant funded activities</li> <li>• Improved identification</li> <li>• Better coordination of service delivery</li> <li>• Stronger partnerships and collaboration to implement McKinney-Vento</li> <li>• Possibility of enhanced local and regional capacity through better teamwork</li> <li>• Possibility of stronger local program leadership; more “leaders of the charge”</li> <li>• Maximum utilization of existing regional structure (both administrative and programmatic infrastructure if either exists)</li> <li>• Can be implemented gradually, addressing emerging issues before going statewide</li> <li>• Local choice to apply as individual LEA or as part of consortium</li> </ul>	<ul style="list-style-type: none"> <li>• Regional leads or lead liaisons do not always have the same “clout” or authority as that typically held by the State Coordinator</li> <li>• Excessive delegation of SEA responsibilities may result in diminished accountability for compliance with the statutes if responsibilities are given to those with less authority</li> <li>• Additional tasks assigned to regional leads may result in less time for delivery of direct services</li> <li>• A regional approach may meet with local resistance if planning process is not adequate and inclusive</li> <li>• Regional funding may not result in funding support provided as needed at the local level</li> <li>• Regional approach may or may not extend to all LEAs</li> <li>• Under-identifying LEAs may not be adequately engaged and may not be included in regional efforts</li> <li>• Capacity of regional leads and local liaisons can be limited or insufficient if local funds and resources are not adequate, or if FTE assigned to McKinney-Vento does not match responsibilities</li> </ul>

## **Section J. Dispute resolution**

### **J.1 Introduction**

The education requirements of the McKinney-Vento Homeless Assistance Act require states to develop and implement a dispute resolution process. The purpose of this document is to offer State Coordinators a menu of options for such development and implementation based on the experiences of colleagues over the past decade. Furthermore, taking a broad perspective on conflict, the document explores additional best practices that State Coordinators can employ to ensure effective compliance and implementation of the McKinney-Vento Act.

While resolving disputes is required, not all disagreements are covered by the dispute resolution process. Therefore, we will offer a continuum for resolving conflicts including proactive strategies to avoid or reduce conflicts, complaints not covered by the dispute resolution process, and issues that require consideration of disputes processes in other legislation as well as those clearly covered by formal McKinney-Vento resolution requirements. Care will be taken to clearly distinguish the legal requirements, current U. S. Department of Education guidance, and best practices supported by the field.

Communication is not a perfect science. Words may have multiple meanings, and multiple perspectives on an issue can result in multiple interpretations. It is not surprising that our laws, being composed of words, are subject to the disagreements and conflict that result from such imperfection. Revisions to legislation, issuance of guidance and regulation, and case law are some of the ways we attempt to add clarity to the words of our laws. Conflict is normal in life and law; how we respond is key. This is no less true when working on behalf of students experiencing homelessness under the education provisions of the McKinney-Vento Act.

Laws often include processes to navigate disagreements. The dispute resolution process guides actions when disagreements arise over the educational placement of homeless children and youth. Under the McKinney-Vento Act, the Education of Homeless Children and Youth (EHCY) Program requires that state educational agencies (SEAs) develop a dispute resolution process as part of the state plan and that local educational agencies (LEAs) carry out the dispute resolution process described in the state plan as expeditiously as possible after receiving notice of the dispute.

State Coordinators for homeless education have seen an increase in the number of disputes. During the 2012 EHCY State Coordinators Meeting, possible explanations for the increase were explored. State Coordinators identified the following:

- Greater parental awareness of their children’s educational rights under McKinney-Vento due to appropriate outreach by schools and the growing conversation regarding similar rights now afforded to children in foster care;
- Economic factors that have led to:
  - Increasing numbers of children identified as experiencing homelessness
  - Increasing durations of homelessness for children
  - Decreasing funding for schools

State Coordinators have observed increasing needs in a climate of decreasing resources. For example, schools are more likely to question a school of origin placement when a family has been doubled up for multiple years while parents have come to expect transportation to allow their child to stay in the same school. Increasing accountability for student achievement creates further potential for conflict. Some schools may be more reluctant to enroll students they perceive to be academically at-risk, and in some cases parents may claim homelessness to access schools perceived as better for their children. Furthermore, funding and accountability can lead to inter-district disagreements regarding McKinney-Vento.

This increase in disagreements has led to State Coordinators spending more time dealing with such time-consuming issues. The relative newness of this phenomenon has resulted in a variety of different responses to conflicts and interpretations of what McKinney-Vento requires. This document attempts to capture promising practices that can be used across the nation and to provide a template from which further discussion and refinement can occur.

## **J.2 Inform, explain and support: Resolving conflicts before they rise to the level of a dispute**

The old adage that an ounce of prevention is worth a pound of cure certainly has its value when thinking about the dispute resolution process. While having proactive policies and activities in

place does not eliminate the possibility of disputes, it certainly can limit disputes and lessen the confrontational/adversarial tone that often accompanies such disagreements. State Coordinators have found the following practices especially useful.

- A. Train local McKinney-Vento liaisons. The more knowledgeable about the law and skilled in working with families and students experiencing homelessness liaisons are, the more likely appropriate procedures will occur at the school door and the less likely that errors and/or misunderstandings will arise that become contentious enough to require formal dispute processes at the local and state levels. Well trained liaisons conduct proactive identification of students, including awareness building within their schools and communities. Liaisons, trained to be sensitive to the stressors and trauma that families experience, are less likely to exacerbate those stressors, reducing the potential for added conflict. Such training should include how to carry out an effective dispute resolution process and how to help families understand their educational rights. NCHE has a variety of training materials developed for liaison training. While some State Coordinators are able to meet the training demands in their states, others have limited opportunities to provide direct training and ensure the field receives the needed information in a number of ways:
  - a. Contracting with a university or educational technical assistance provider
  - b. Using veteran liaisons to provide peer-to-peer support in their regions
  - c. Advertising and supporting attendance at NCHE webinars and NAEHCY conferences
  - d. Collaborating to have sessions for liaison training as part of larger training and conference events hosted by the SEA or state education groups
- B. Conduct LEA McKinney-Vento monitoring. Ensuring that all LEAs in the state are accountable and fulfilling their responsibilities to serve students experiencing homelessness is one purpose for monitoring. Monitoring can increase compliance at the local level and increase knowledge of best practices, making it less likely that an LEA will violate McKinney-Vento and more likely that liaisons will be able to adequately explain decisions to parents, guardians, or

unaccompanied youth<sup>1</sup>. Also, the SEA can review how the LEA resolves disputes during monitoring to ensure compliance with that specific procedure.

Monitoring provides opportunities for one-to-one discussions. Liaisons have commented that while monitoring is stressful, it forced them to stop and review their program. The time spent reviewing the questions and collecting documentation generated ideas for program improvement. If a finding occurs, it may provide the leverage for change that a liaison could not accomplish without state support. In addition to the reactive elements of monitoring, the process can be used proactively to avoid future conflicts. Monitoring can identify systemic difficulties that require state level intervention in terms of policy change, training needs, and development of resources. Additionally, State Coordinators can discover a variety of activities that are being used around their states and share these ideas with others.

- C. Track technical assistance requests that come to the state level. Analyze the questions that frequently arise and identify issues that require clarification. Problem areas can be addressed through training or through the creation of sample forms or other resources, preventing emerging issues from becoming more pervasive and leading to an increase in disputes.
- D. Track complaints that come to the state level. Analyzing issues that arise more frequently may lead to targeted technical assistance and/or shape monitoring questions and LEA selection.
- E. Inform advocacy groups. Making sure that advocacy groups have accurate information about the educational rights of children and youth experiencing homelessness is critical to avoiding misinformation being shared with parents and the community. Making sure such groups know what processes can be used when a difference of opinion occurs, including opportunities for informal resolution of problems can lessen the need for more formal

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<sup>1</sup> In this publication the term “unaccompanied youth” is used according to its definition in the McKinney-Vento Act: a youth who is experiencing homelessness and “not in the physical custody of a parent or guardian.” 42 U.S.C. §11434a.

disputes.

- F. Ensure LEAs use feasibility worksheets and other checklists, such as the one found in the *NCHE Local Homeless Education Liaison Toolkit*, Appendix D<sup>2</sup>. State Coordinators may request LEAs provide copies of such documents when written notice is given to families or as required documentation to review during a monitoring visit. McKinney-Vento is explicit about the need for written notification when there is a disagreement about school selection. However, without documentation that shows how a decision was reached (and that a process was used to reach a decision), it is difficult to know whether the intent of the law is being fulfilled. Using best interest for school of origin worksheets and checklists to determine eligibility, increases the transparency of decision making and provides the paper trail should a decision be challenged.<sup>3</sup> A formal dispute resolution process is adversarial in its structure. By ensuring these early, more informal processes occur, there will be less need to use the formal dispute resolution process. This is important in building and maintaining trusting relationships between school staff and families in homeless situations.
- G. Assist LEAs in establishing clear expectations. Clear roles, responsibilities, and procedures remove the ambiguity that increases the likelihood of a conflict. For example, transportation decisions are revisited when students do not attend school regularly or a safety concern arises. A contract between the school and parents that describes district, parent, and student responsibilities as well as the consequences when those responsibilities are not met can diffuse many transportation conflicts. (A sample contract is included in Appendix J.1 Transportation Contract).
- H. Support trauma-informed responses. Families experiencing homelessness are often facing high stress and trauma. Training staff to recognize the signs of trauma and how to diffuse interactions when a parent or student is upset reduces adversarial relationships.

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<sup>2</sup> *NCHE Local Homeless Education Liaison Toolkit* can be found [here](#).

<sup>3</sup> More examples can be found in the NCHE brief [Guiding the Discussion on School Selection](#)

- I. Withhold judgment while collecting information from all parties. State Coordinators receive calls from parents, youth and schools when a conflict arises. The information heard is often one-sided. Offering an opinion based on such information could lead to rescinding comments once additional information is obtained. This affects credibility and may actually increase the level of conflict. To help convey a need to explore all information necessary to make a determination, include disclaimers in verbal or written communication such as, “Based upon the information you have shared with me.....” or, “Let me look into this a little further before responding...”
- J. Use an intake/technical assistance form<sup>4</sup> to collect the basic information that will be needed while exploring a case.
- K. If your state does not have a uniform dispute resolution process for use at the district level, require dispute resolution policies as a part of the McKinney-Vento subgrant request for proposals and require a copy during monitoring.
- L. Include providers and liaisons in a statewide advisory body. Consider including homeless or formerly homeless parents, when possible. A responsibility of the advisory board could include offering input on disputes that require more input due to the multiple factors being considered. The board may develop a process for making determinations, including what information to obtain and how that information is organized and weighted. Such a process could be replicated with future cases. A consistent process should lead to less confusion when families navigate the system and reduce the likelihood of conflicts caused by such confusion or miscommunication.
- M. Review the state level dispute resolution process on a regular basis. Consider conducting a focus group with local liaisons who have worked through a dispute to explain the questions and challenges that arose and to offer suggestions for improving the process. Consider sharing the state process with other State Coordinators.

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<sup>4</sup> Sample technical assistance forms can be found in the *State Coordinators Handbook*, Appendix E-3.

### J.3 Dispute resolution: Law and practice basics

The McKinney-Vento Act provides minimum standards for the resolution of disputes that arise under the Act. However, the statute leaves most of the specific procedures to the discretion of each state. Every state must establish procedures for the prompt resolution of disputes regarding the educational placement of homeless children and youth. These procedures must be described in the state's McKinney-Vento State Plan that is submitted to the U.S. Department of Education.<sup>5</sup> Dispute procedures also may be formalized in the state education code, school board policy, or policies, procedures or guidance from the state education agency. Every state's dispute procedures must uphold all the rights the McKinney-Vento Act provides to children, youth, parents and guardians.

The Act mandates basic protections and procedures that must be in place when a dispute arises "over school selection or enrollment in a school."<sup>6</sup> Therefore, the protections and procedures must be available to address any dispute about whether a student has the right to enroll in a particular school, whether based on eligibility, best interest, school selection or immediate enrollment. The law also defines "enrollment" as "attending classes and participating fully in school activities."<sup>7</sup> Therefore, McKinney-Vento dispute procedures apply to any dispute arising under the Act, including disputes over issues such as:

- Eligibility: When a parent seeks to enroll a child, or an unaccompanied youth seeks enrollment in a particular school under the McKinney-Vento Act, does the child or youth meet the definition of "homeless" such that immediate enrollment in school is required, regardless of missing school records, proof of residency, immunization and other health records, lack of a parent or guardian, or other documentation?<sup>8</sup>

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<sup>5</sup> 42 U.S.C. §11432(g)(1)(C).

<sup>6</sup> 42 U.S.C. §11432(g)(3)(E).

<sup>7</sup> 42 U.S.C. 11434A(1).

<sup>8</sup> However, in instances where the eligibility dispute is far afield to the issue of homelessness, the State Coordinator may tell the parent that the dispute does not fall under McKinney-Vento. State Coordinators should consult with NCHE or the U.S. Department of Education for guidance on questions of eligibility.

- School selection: Is it in the child’s or youth’s best interest to continue attending the school of origin or to enroll in the local attendance area school?<sup>9</sup>
- Participation: Is the child or youth attending classes immediately, even if the school has not yet received school records, special education records, immunization or other health documents? Is she being provided full participation in school activities? Has enrollment been immediate in any public school that nonhomeless students who live in the attendance area in which the child or youth is actually living are eligible to attend?
- Transportation: Is the school district required to provide transportation to a student in a particular situation? Does the transportation provided permit the child to attend classes and participate fully in school activities?

When a dispute arises under the McKinney-Vento Act, the law requires the following minimum procedures:

1. The child or youth “shall be immediately admitted to the school in which enrollment is sought, pending resolution of the dispute.”<sup>10</sup> In the case of an unaccompanied youth, the local liaison shall ensure that the youth is immediately enrolled in school pending resolution of the dispute<sup>11</sup>. The U.S. Department of Education strongly emphasized the importance of this requirement in its Guidance:

“When enrollment disputes arise, it is critical that students not be kept out of school. Interruption in education can severely disrupt the student’s academic progress. To avoid

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<sup>9</sup> The McKinney-Vento Act provides parents, guardians and youth the right to attend the school of origin (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”) or “any public school that nonhomeless students who live in the attendance area in which the child or youth is actually living are eligible to attend.” 42 U.S.C. §§11432(g)(3)(A), (G). *Guiding the Discussion on School Selection*, a tool to assist liaisons in discussing these options with parents and youth, is available at [http://center.serve.org/nche/downloads/briefs/sch\\_sel\\_checklist.pdf](http://center.serve.org/nche/downloads/briefs/sch_sel_checklist.pdf).

<sup>10</sup> 42 U.S.C. §11432(g)(3)(E)(i).

<sup>11</sup> 42 U.S.C. §11432(g)(3)(E)(iv).

such disruptions, LEAs need an established process for resolving school placement disputes. Permitting students to enroll immediately in the school of choice pending resolution of disputes helps provide needed stability.”<sup>12</sup>

Since enrollment includes attending classes and participating fully in school activities while disputes are pending, students must be able to participate fully in school and receive all services to which they are entitled. This includes transportation services, as guidance from the U.S. Department of Education has clarified: “The McKinney-Vento Act’s transportation requirements apply while disputes are being resolved.”<sup>13</sup>

2. The parent or guardian shall be provided with a written explanation of the school's decision regarding school selection or enrollment, including the rights of the parent, guardian, or youth to appeal the decision.<sup>14</sup> In addition, any time a student is sent “to a school other than the school of origin or the school requested by a parent or guardian,” the LEA must provide a written explanation of its decision and the right to appeal, whether or not the parent/guardian disputes the placement.<sup>15</sup> In the case of an unaccompanied youth, the local liaison must provide notice to the youth of the right to appeal.<sup>16</sup>
3. The child, youth, parent, or guardian shall be referred to the liaison, who shall carry out the dispute resolution process as expeditiously as possible.<sup>17</sup>

These procedures are fairly minimal when compared to dispute processes outlined in other education laws, such as the Individuals with Disabilities Education Act (IDEA) and the Family Education Rights and Privacy Act (FERPA). Congress has allowed LEAs and SEAs considerable leeway in their McKinney-Vento procedures. However, of all the procedures and rights Congress could have mandated, they focused only on these three. That focus indicates the importance Congress placed

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<sup>12</sup> U.S. Department of Education (2004). Education of Homeless Children and Youth Program, Non-Regulatory Guidance, G-5.

<sup>13</sup> U.S. Department of Education (2004), H-5.

<sup>14</sup> 42 U.S.C. §11432(g)(3)(E)(ii).

<sup>15</sup> 42 U.S.C. §11432(g)(3)(B)(ii).

<sup>16</sup> 42 U.S.C. §11432(g)(3)(B)(iii).

<sup>17</sup> 42 U.S.C. §11432(g)(3)(E)(iii).

on these three specific requirements. States and school districts should carefully design and review their procedures to ensure a student never misses a day of school due to a dispute; parents, guardians and youth know their rights and are able to appeal decisions; and the liaison is the key player in carrying out the dispute process quickly. We will suggest strategies to ensure these three key requirements in the following section.

Every LEA in every state must follow McKinney-Vento's dispute resolution procedures. The McKinney-Vento Act applies to every LEA in every state, regardless of whether the LEA receives McKinney-Vento funds. If dispute processes are not followed, or if a parent, guardian or youth is not satisfied with the final resolution of a dispute at the state level, the parent, guardian or youth can sue in federal court (and in some states, in state court as well). Any issue under the McKinney-Vento Act can be enforced through a private right of action in court against both the SEA and LEA. Since the ESEA was amended in 2002, parents have sued SEAs and/or LEAs under the McKinney-Vento Act in Hawaii, Illinois, Maryland, New York and Pennsylvania. In every case, the parents either have won their case in court or settled out of court, and states and school districts have paid significant legal fees and implemented new policies and procedures. Therefore, it is important for SEAs and LEAs to understand they can be sued, and if they are not in compliance with the McKinney-Vento Act, they will likely lose the lawsuit.

#### **J.4 Dispute resolution: Designing and implementing clear, strong procedures**

There are many overarching aspects of the process to consider when designing and implementing both state and local McKinney-Vento dispute procedures.

##### **J.4.1 The McKinney-Vento dispute procedure: Its own process versus part of a broader state appeals process**

This will depend largely on the appeals processes available in your state. If your state has an existing appeals process that can render decisions quickly; is fully accessible to parents, guardians and youth struggling with the challenges of homelessness; can provide an adequate opportunity for schools, parents and youth to present information; and includes liaisons and decision-makers who

are well-versed on the McKinney-Vento Act, then that appeals process may be appropriate for McKinney-Vento disputes. It may have the added benefit of involving stakeholders in the SEA and adding greater weight and importance to the McKinney-Vento Act. If school district administrators are familiar with the process, they may take McKinney-Vento disputes more seriously. However, State Coordinators must ensure the process meets the McKinney-Vento Act's basic requirements and should pay particular attention to ensuring immediate enrollment of students while disputes are pending.

Many states have found it helpful to have McKinney-Vento dispute procedures encoded in their state education laws or issued as regulations. The McKinney-Vento Act does not require that its dispute process appear in code or regulations, but experience indicates that raising the procedures to the level of statutory or regulatory requirements enhances compliance by LEAs and uniformity across the state.

#### **J.4.2 A state-created process that all LEAs must follow versus LEA-created processes**

While the McKinney-Vento Act does not specifically require LEAs to have written dispute policies, LEAs are required to provide written explanations of their decisions and the right to appeal and refer youth, parents and guardians to the liaison to carry out the dispute resolution process expeditiously. It is a good practice for LEAs to have written policies and procedures in place to ensure McKinney-Vento's mandates are carried out. Written policies can protect students, parents and the school district by providing a clear, objective procedure for disputes.

In general, a single, uniform process for McKinney-Vento disputes for all LEAs is preferable for several reasons. First, homeless families and youth by definition are highly mobile, which makes it likely they will come into contact with several different school districts over a single school year. Having to learn how to access and navigate a different dispute procedure in each district places an added and unnecessary burden on them. Second, disputes often involve more than one district. It can be challenging for parents, students, districts, and the state to navigate an inter-district dispute that implicates two different dispute processes. Finally, it will be more difficult for the State

Coordinator to ensure that all LEAs have dispute procedures that comply with the McKinney-Vento Act if each LEA has its own, unique process.

For these reasons, the State Coordinator may want to develop a local dispute resolution policy and procedure to be implemented by all LEAs in the state. If the SEA is not willing or able to develop a uniform policy, the State Coordinator at least should have a recommended process available and strongly encourage school districts to use it. In developing the policies, the State Coordinator should consult with other stakeholders at the SEA, such as his or her supervisor; Title I, Part A administrators; special education administrators; SEA legal counsel; the state school boards association; and a focus group of local liaisons and school district administrators. Involving stakeholders in the process to develop the policies should help increase buy-in and compliance and ensure strong, efficient dispute procedures.

For example, the state of Washington developed a dispute resolution procedure for use in all LEAs. The Washington State School Directors' Association (WSDDA) adopted the policy as a model and disseminated it to its members across the state. To ensure all LEAs have adopted and are implementing the policy, Washington's consolidated program review specifically monitors that all LEAs have incorporated it. Washington's dispute policy can be found in Appendix J.2 Sample State Policy. Similarly, State Coordinators in Oregon, Virginia and other states have collaborated with their school board associations, with the result that they produce McKinney-Vento policies which LEAs generally adopt as a matter of course. State Coordinators should contact their state school board association to find out if they have current McKinney-Vento Act policies and, if not, work with these groups to develop strong policies and support their implementation.

### **J.4.3 Timelines for local and state-level appeals**

While the McKinney-Vento Act does not mandate specific timelines, it does require "prompt" resolution of disputes. SEAs should establish timelines to resolve disputes at the local and state level.<sup>18</sup> Timelines should balance several competing factors:

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<sup>18</sup> U.S. Department of Education (2004), G-9.

- The requirement to resolve disputes promptly
- The recognition that parents and youth struggling with homelessness are likely to need extra time to file a dispute and prepare information for decision-makers
- The desire to provide stability and predictability to students and schools
- Time left in the school year

In general, fairly short timelines are appropriate for McKinney-Vento disputes. For example, North Carolina provides five business days for submission of materials; Florida provides ten days. Situations will arise in which parents, youth or schools may need additional time to present information, and procedures should allow for parties to request additional time on a case-by-case basis. In particular, parents and youth may not be able to meet tight deadlines due to the upheaval of homelessness and crises that arise in their lives. Allowing parties to request a few extra days if they can justify that request with a description of exigent circumstances increases fairness and helps ensure that decision-makers receive complete information. Timelines and the grounds for requesting extensions of time should be made clear in the procedures, in language understandable to homeless parents and youth.

#### **J.4.4 Procedures to ensure that parents, guardians and youth know their rights**

Local liaisons must make sure that families are aware of the educational and related opportunities available to their children (including transportation) and must post public notice of the education rights of children and youth in homeless situations.<sup>19</sup> Posters, such as the ones provided by the U.S. Department of Education through NCHIE ([youth and parent posters](#)) and other information translated into languages represented in the community must be placed where homeless families and youth receive services. Many states have developed posters and other public notices in a variety of languages, including [Washington](#) and [New York](#). It is also a good practice to provide all parents with a written statement of McKinney-Vento rights at the time of enrollment, post such a statement on the LEA website, and include it as part of parent/student handbooks.

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<sup>19</sup> 42 U.S.C. §§11432(g)(6)(A)(iv), (v), (vii).

NCHE offers many summaries of rights for parents and youth on its [website](#).

#### **J.4.5 Procedures to ensure that parents, guardians and youth are able to appeal decisions on the local and state levels**

Most parents and youth experiencing homelessness have limited resources, little to no ability to secure attorneys or advocates, and are dealing with the extreme stressors of homelessness. To ensure that McKinney-Vento dispute procedures are accessible to them, procedures should be as informal and streamlined as possible, consistent with impartial and complete review. Parents, guardians and youth must receive clear and simple information about their right to dispute decisions, how to initiate the dispute, how the procedure will unfold, who in the school district and SEA they can contact with questions, and the timeline for the process. Schools should provide this information in writing, but the local liaison (or a designee trained in the McKinney-Vento Act and skilled at effective communication with parents and youth) should also explain the process orally to ensure parents, guardians, and youth understand.

In addition, the U.S. Department of Education suggests that parents, guardians, and unaccompanied youth should be able to initiate the dispute resolution process directly at the school they choose, as well as at the district or local liaison's office.<sup>20</sup> Most homeless families and youth struggle with transportation. They may not have a way to travel to a particular office to initiate the dispute process. The need to travel may delay them initiating the dispute. If timelines are short, the family or youth may be unable to initiate the dispute within the time frame. To eliminate transportation barriers, parents, guardians and youth should be provided the maximum flexibility to initiate the dispute and submit appeals documents at the most convenient school or district office.

The paperwork necessary to initiate a dispute also should be minimal, to eliminate barriers to parents and students accessing the process. For example, when a school or school district provides written notice of a decision to a parent or youth, the written notice could include a space where the parent or youth indicates whether he or she agrees with the decision. If the parent or youth indicates disagreement, that should trigger a conversation about the dispute process. A

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<sup>20</sup> U.S. Department of Education (2004), G-9.

particularly effective process is for the liaison or trained designee to explain the grounds for the dispute and the dispute process, ask the parent, guardian or youth if he or she wishes to dispute the decision, and initiate the dispute immediately. The liaison or designee can check the appropriate box on the form that indicates a dispute has been initiated. This can be accomplished via telephone, if it is difficult for the parent, guardian, or youth to get to a school site.

#### **J.4.6 Recommended elements of strong written notices**

The *2004 Guidance* states, “Written notice protects both students and schools by outlining the specific reasons for the school’s decision. It facilitates dispute resolution by providing decision-makers with documents to guide their determinations.... Written notice should be complete, as brief as possible, simply stated, and provided in a language the parent, guardian, or unaccompanied youth can understand.”<sup>21</sup> The [NCHC Local Homeless Education Liaison Toolkit](#) includes a sample of such written notice in Appendix D.<sup>22</sup>

These basic suggestions from the U.S. Department of Education are excellent guidelines for written notice. Specifically, the U.S. Department of Education suggests that written notices contain the following elements:<sup>23</sup>

- Contact information for the local liaison and State Coordinator, with a brief description of their roles;
- A simple, detachable form that parents, guardians, or unaccompanied youth can complete and submit to the school to initiate the dispute process (the school should copy the form and return the copy to the custodial parent, guardian, or youth for their records when it is submitted);
- A step-by-step description of how to formally dispute the school’s decision;

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<sup>21</sup> U.S. Department of Education (2004), G-5, G-9.

<sup>22</sup> *NCHC Local Homeless Education Liaison Toolkit* can be found at:  
[http://center.serve.org/nche/pr/liaison\\_toolkit.php](http://center.serve.org/nche/pr/liaison_toolkit.php)

<sup>23</sup> U.S. Department of Education (2004), G-9.

- Notice of the right to “be immediately admitted to the school in which enrollment is sought, pending resolution of the dispute,”<sup>24</sup> including the right to participate fully in all school activities;
- Notice of the right to appeal to the state if the district-level resolution is not satisfactory; and
- Timelines for resolving district-and state-level appeals.

#### **J.4.7 Strategies to ensure that decision-makers have all the information they need to make impartial decisions consistent with the McKinney-Vento Act**

To help ensure that local and state decision-makers have all the information they need to make good decisions, schools, parents, guardians, and unaccompanied youth should be informed that they can provide written or oral documentation to support their position. If the parent or youth provides information to the school, the LEA should include that information with the materials it submits to the state should the local decision be appealed, along with a list of what the parent or youth has provided. Examples of helpful written documentation include:

- A clear, concise description of the issue (e.g., why the student does / does not meet the definition of “homeless”; why the student does / does not have the right to immediate enrollment in an attendance area school; why attendance in the school of origin is / is not in the student’s best interest)
- A timeline of contacts between the school and the parent/guardian or youth
- Copies of emails between the school and parent/guardian or youth
- A log of phone contacts and meetings between the school and parent/guardian or youth
- For disputes involving eligibility, information documenting the following key points is helpful:<sup>25</sup>
  - Has a local liaison from another school district found the student eligible?
  - Can the parents or youth describe their living situation? Where are they living? How

<sup>24</sup> 42 U.S.C. §11432(g)(3)(E)(i).

<sup>25</sup> NCHE’s issue brief on Determining Eligibility is always a good guideline for how to apply the definition of homeless to a particular situation. The brief is available at [http://center.serve.org/nche/downloads/briefs/det\\_elig.pdf](http://center.serve.org/nche/downloads/briefs/det_elig.pdf).

long have they been there? Do they know how long they will stay? Do they have a legal right to be there? Why did they leave their last residence? Where would they go if they had to leave where they are staying?<sup>26</sup>

- Can parents or youth provide any documentation of their living situation, such as a motel receipt, letter from a case manager, or an eviction notice? Such documentation *cannot* be required and often is impossible for families or youth to obtain. Families or youth may be unwilling to provide such information. However, if available, it can be helpful in resolving the dispute, and schools should tell parents and youth that this documentation can support their claim of eligibility.
- Can the school or LEA articulate its reasons for believing the student does not “lack a fixed, regular and adequate nighttime residence?”
- For disputes involving school of origin attendance, the following information can be useful:
  - Has each side completed the [“Guiding the Discussion on School Selection”](#) checklist?
  - Can each side explain why attending the school of origin is, or is not, in the child’s best interest?
- For disputes involving immediate enrollment and full participation in school, decision-makers may need to know the following information:
  - What is the school’s reason for denying enrollment and full participation?
  - Can the parents or youth provide information about where they are staying and why the school in which they are seeking enrollment is a “school that nonhomeless students who live in the same attendance area are eligible to attend?”

Schools also may inform parents, guardians, and unaccompanied youth that they can seek the assistance of advocates or attorneys and may wish to provide a list of local attorneys and

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<sup>26</sup> When working with unaccompanied youth, accessing such information can be especially challenging. Unaccompanied youth often are apprehensive about sharing such details, in particular in cases of abuse or neglect where the youth does not want to get his or her parent in trouble or to invite the involvement of child protective services. Local liaisons should keep in mind that unaccompanied youth are eligible for the McKinney-Vento Act’s services, even when the precise reason for their homelessness cannot be established.

advocates who have thorough knowledge of the McKinney-Vento Act and are willing to work with parents and students, if available. The support of a trained advocate can be critical to a parent, guardian or youth, to ensure they submit the necessary dispute documents, provide appropriate information about their situation, and receive their McKinney-Vento rights. Parents and youth often need help to know what information to provide, how to obtain it, and how to present it. Without an advocate, it is uncommon for a parent or youth to have the training and skill in dispute resolution or access to documentation comparable to that of a school district attorney or administrator.

While the McKinney-Vento Act does not require the liaison to be the actual decision-maker, the liaison must “carry out the dispute resolution process.” Therefore, the liaison must be closely involved every step of the way. In fact, in most cases it would make sense for the liaison to be the decision-maker at the first level of appeal, since the liaison is likely to have the most in-depth knowledge of both the law and the particular factual situation. Ensuring the involvement of the local liaison in local dispute procedures and the State Coordinator in both local and state-level disputes is another way to promote informed, consistent decision-making. As the U.S. Department of Education has noted, “LEA homeless liaisons help ensure that disputes are resolved objectively and expeditiously.”<sup>27</sup>

Similarly, State Coordinators can be critical partners in resolving disagreements informally and ensuring disputes are mediated fairly and successfully. They are the state-level expert on the McKinney-Vento Act with access to the U.S. Department of Education and national colleagues. Involving them in local level disputes can help avoid unnecessary appeals, promote uniformity in implementation across the state, and increase compliance with the law.

#### **J.4.8 Best practices for state-level appeals**

The McKinney-Vento Act does not specify how appeals beyond the school district level should operate or who should make final decisions at the state level. However, the law strongly implies that State Coordinators should be involved in state-level appeals. The McKinney-Vento Act

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<sup>27</sup> U.S. Department of Education. (2004), G-5.

requires states to ensure that school districts comply with the Act.<sup>28</sup> Without a role in dispute resolution, the state will not be able to ensure compliance.

In practice, it is critical that State Coordinators play a role in the process and resolution of disputes. They are the McKinney-Vento experts at their SEAs and bear the responsibility of ensuring compliance with the Act statewide. However, in some states it can be a conflict of interest for a State Coordinator who is the sole, final decision-maker to get involved with the dispute at the local level. Contacts with the school, parent or youth at that stage in the process can color the State Coordinator's judgment over the final appeal. Since the State Coordinator can play a critical role in mediating local disputes, it would be impractical to create an appeals system that restricted the Coordinator's ability to become involved early in the process. In addition, the State Coordinator's legal duty to ensure statewide compliance and provide technical assistance to LEAs can be complicated if the Coordinator is the sole decision-maker on appeals. Such decisions can strain relationships with local liaisons or school district administrators.

Some methods to ensure the State Coordinator has appropriate involvement in both local and state-level disputes are:

1. Strongly encourage local liaisons to notify the State Coordinator any time they provide written notice of a disputable decision. For example, in Oregon, local liaisons automatically copy the State Coordinator on written notices. Often, the Coordinator identifies the issue as a compliance issue, rather than a dispute, and is able to contact the district to induce compliance. In other cases, he/she can provide valuable legal and policy information to the liaison to help facilitate a fair, informal resolution to the situation.
2. Create a McKinney-Vento Advisory Board. This body can review appeals, as well as support the program in other ways. The Advisory Board could include veteran liaisons, colleagues at the SEA, and State Coordinators from other states.
3. Create a special McKinney-Vento Dispute Panel of three to five people to make decisions on state-level appeals. Panel members can be SEA employees who are chosen by the State Coordinator and thoroughly trained on the McKinney-Vento Act. The State Coordinator may

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<sup>28</sup> 42 U.S.C. §§11432(f)(6), (g)(2).

or may not be a member of the panel. In addition, State Coordinators from other states may serve on the panel, to bring their expertise and perspective to the dispute, without the conflicts that can arise when a State Coordinator is making decisions in his or her own state.

4. Designate administrative law judges, ombudspersons, or other decision-makers who are independent but receive comprehensive training on the McKinney-Vento Act from the State Coordinator and can consult with the Coordinator, as needed.

#### **J.4.9 Effectively addressing inter-district issues**

Due to the high mobility intrinsic to homelessness, it is not uncommon for a McKinney-Vento dispute to involve more than one LEA. In particular, disputes over attendance at the school of origin and transportation are likely to involve two LEAs. Inter-district disputes should be resolved at the SEA level, and parents and youth should be shielded from these disputes unless they possess information essential to a resolution.<sup>29</sup> Regardless of the subject matter of the dispute, State Coordinators must be vigilant to ensure students are not out of school while inter-district disputes are pending.

State Coordinators may resolve inter-district disputes using the same state-level procedures as they use for other disputes. There should be a forum for both LEAs, as well as the parent, guardian or youth, if applicable, to provide documentation to support their position. If the dispute involves other education laws, such as IDEA, the State Coordinator should consult with colleagues at the SEA responsible for implementing those laws. If the dispute involves LEAs in two different states, the Coordinators of both states should be involved as early as possible in the process.

### **J.5 Special considerations**

#### **J.5.1 Compliance issues versus disputes**

States are required to ensure that all LEAs in the state comply with the McKinney-Vento Act.<sup>30</sup> Often, McKinney-Vento disputes indicate more systemic compliance issues. In particular,

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<sup>29</sup> U.S. Department of Education. (2004), H-5.

<sup>30</sup> 42 U.S.C. §§11432(f)(6), (g)(2). U.S. Department of Education. (2004), D-4, D-5.

disputes over enrollment are likely to indicate systemic non-compliance issues. When a school district refuses to enroll a student due to lack of records, time in the school year, lack of a guardian, or similar issue, the matter is not a dispute as much as a systemic compliance issue. In such cases, the State Coordinator should use the tools at his or her disposal to induce immediate compliance, rather than burden the parent, guardian, youth or school system with the need to follow the dispute process. If a parent or youth seeks to file a dispute, the State Coordinator should explain that the problem is a compliance issue, not a dispute, and tell the parent what specific steps they are taking to resolve the problem quickly. The Coordinator may wish to develop a form distinguishing between compliance issues and disputes, which can be used with LEAs, parents or youth to help ensure a quick and effective resolution. The flowchart in Section J.6 may provide a template for such a form.

The state has several different means to ensure compliance, including:

- Provide regular, on-going technical assistance and professional development to LEAs.
- Seek the support of other SEA professionals to ensure they emphasize McKinney-Vento Act compliance in their contacts with schools. For example, the following SEA staff should ensure their local counterparts are aware of and complying with the McKinney-Vento Act's requirements: Title I, Part A; migrant; special education; charter schools; Title I, Part D; school health and nurses; school counselors; etc.
- Monitor all school districts regularly. McKinney-Vento monitoring should be incorporated in the SEA's consolidated program monitoring.
- The SEA can sanction noncompliant school districts by withholding federal funds, including Title I, Part A funds.

### **J.5.2 Complaints/appeals involving issues outside of the McKinney-Vento Act**

The McKinney-Vento Act's dispute provisions and procedures apply to any dispute related to school selection and enrollment under the McKinney-Vento Act. However, disputes involving children and youth experiencing homelessness may be based on other laws. For example, a student who is homeless may also have a disability and may allege violations of the Individuals with

Disabilities Education Act. Disputes could arise under other federal education laws, civil rights laws, state laws, and even the federal or state constitutions.

When disputes arise under other laws, homeless students must be provided access to the appropriate dispute procedures provided under those laws. The McKinney-Vento dispute process is not the appropriate forum for disputes involving other laws, as it may not include the procedural protections required or decision-makers who are trained in other laws. When complaints involve issues outside the McKinney-Vento Act, the State Coordinator should convene a meeting with colleagues in the SEA who implement the other laws, to determine the appropriate forum for the dispute. Some complaints can be disputed under both the McKinney-Vento dispute procedures and those under other statutes. A group of colleagues can tease out the different legal issues and determine the most expeditious and fair way to resolve the complaint, in accordance with the laws governing each issue area. In addition, when disputes are mediated through another state or federally-mandated process, State Coordinators should participate, as appropriate, to ensure McKinney-Vento rights and responsibilities do not get lost in the process.

### **J.5.3 Charter schools**

Charter school laws vary by state. Depending on state law and/or the school's charter, charter schools are either part of an existing LEA or organized as their own LEA. In either case charter schools must follow the McKinney-Vento Act's mandates. A charter school determined to be a school must follow the McKinney-Vento Act's requirements for schools and must collaborate with the liaison for the LEA to which it belongs. A charter school determined to be its own LEA must follow the Act's requirements for LEAs, including designating a local liaison. Charter school students who are homeless have the right to immediate enrollment in school, school of origin attendance, transportation, and other services the McKinney-Vento Act provides.<sup>31</sup> In the case of a dispute, students must be immediately admitted to the school in which enrollment is sought, pending resolution.

Depending upon how charter schools are organized under state law, there may be

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<sup>31</sup> If the charter school has particular, skills-related entrance requirements, the student must meet those criteria (for example, a fine arts charter school with requirements related to artistic ability).

differences in specific procedures for resolving disputes. When charter schools are part of another LEA, the charter school must follow the dispute procedures of that LEA. The local liaison will manage the dispute process and guide parents, guardians and youth through the process in the same way as for any student of any school in the district. Local-level and state-level appeals will apply as they would in any case.

When a charter school is organized as its own LEA, the charter school must designate its own local liaison. That liaison would have the responsibility to carry out dispute procedures. If the state has established dispute procedures for LEAs, the charter school must follow those procedures. If the state allows LEAs to develop their own procedures, the charter school may establish its own process or follow the process of a neighboring LEA. The charter school is legally required to meet all the same McKinney-Vento procedural requirements as other LEAs.

#### **J.5.4 Disputes regarding children and youth “awaiting foster care placement”**

The McKinney-Vento Act includes children and youth “awaiting foster care placement” in its definition of homeless. There is no federal definition of this term, and states and LEAs have adopted various interpretations.

The McKinney-Vento Act does not establish any different procedures for disputes involving students “awaiting foster care placement.” However, states and LEAs may want to consider the following circumstances that often arise in disputes regarding this group of students:

1. How long is a child or youth “awaiting” foster care placement? At what point is the child *in* foster care? The McKinney-Vento Act does not place a time limit on homelessness, and homeless situations can last months or even years. However, the term “awaiting foster care placement” contains a timeframe: students are eligible while they are awaiting placement, but once placed in care, they are no longer eligible. Many states have issued guidance to define the term “awaiting foster care”; in that case, local liaisons should follow the state guidance. The McKinney-Vento Act gives local liaisons the right and responsibility to identify homeless children and youths. Local liaisons, not child welfare caseworkers or advocates,

must apply the McKinney-Vento definition and any applicable state laws or guidance in determining whether a child is “awaiting foster care placement”.

2. Children and youth in the foster care system often have a legion of adults involved in their lives: parents, foster parents, social workers, judges, court-appointed special advocates, guardians ad litem, mental health professionals, group home case managers, etc. Once foster parents are involved, the child is not likely to be considered “awaiting foster care placement.” However, in most situations, more than one adult will be involved and may want to participate in the youth’s education. Who should be considered the parent or guardian? Who has the right to initiate a dispute on the child’s behalf? The student’s child welfare social worker should be able to identify who has the authority to make educational decisions for the student. In some cases there will be a court order or other document specifying the decision-maker.
3. How does the family or juvenile court case interact with the McKinney-Vento dispute? The court’s jurisdiction over the public school system varies based on state law. The court does have jurisdiction over the child welfare agency and can order that agency to take action related to the child’s education, such as providing documents to the school, providing transportation, and arranging additional services such as mental health counseling.

Building positive relationships with local child welfare agencies, case workers, and judges can help eliminate unnecessary disputes regarding students awaiting foster care placement. State Coordinators play an important role in supporting local liaisons, particularly in regard to this population. When State Coordinators can secure the understanding and cooperation of state child welfare leaders, those leaders can help ensure that local child welfare agencies and social workers have accurate information about the McKinney-Vento Act and respect the role and authority of the local liaisons.

## J.6 Navigating conflict resolution

As the previous sections describe the many nuances in determining what can be disputed and how to handle other compliance issues, State Coordinators are left with a maze of decisions. This section proposes a template for a differentiated process to address conflicts brought to the attention of the State Coordinator. The process suggests that there are four basic types of conflicts/complaints:

- Conflicts clearly addressed by the McKinney-Vento Act that require use of the dispute resolution process;
- Conflicts clearly addressed by the McKinney-Vento Act that are compliance issues, which parents or youth should not have to dispute;
- Conflicts that involve the intent of the McKinney-Vento Act but are not explicitly compliance issues; and
- Conflicts that are outside the purview of the McKinney-Vento Act.

Table 1 offers several examples of each conflict for illustrative purposes. This section will elaborate further on these situations and the decision making process the State Coordinator may use to determine the proper course.

Table 1. Types of Conflict and Examples

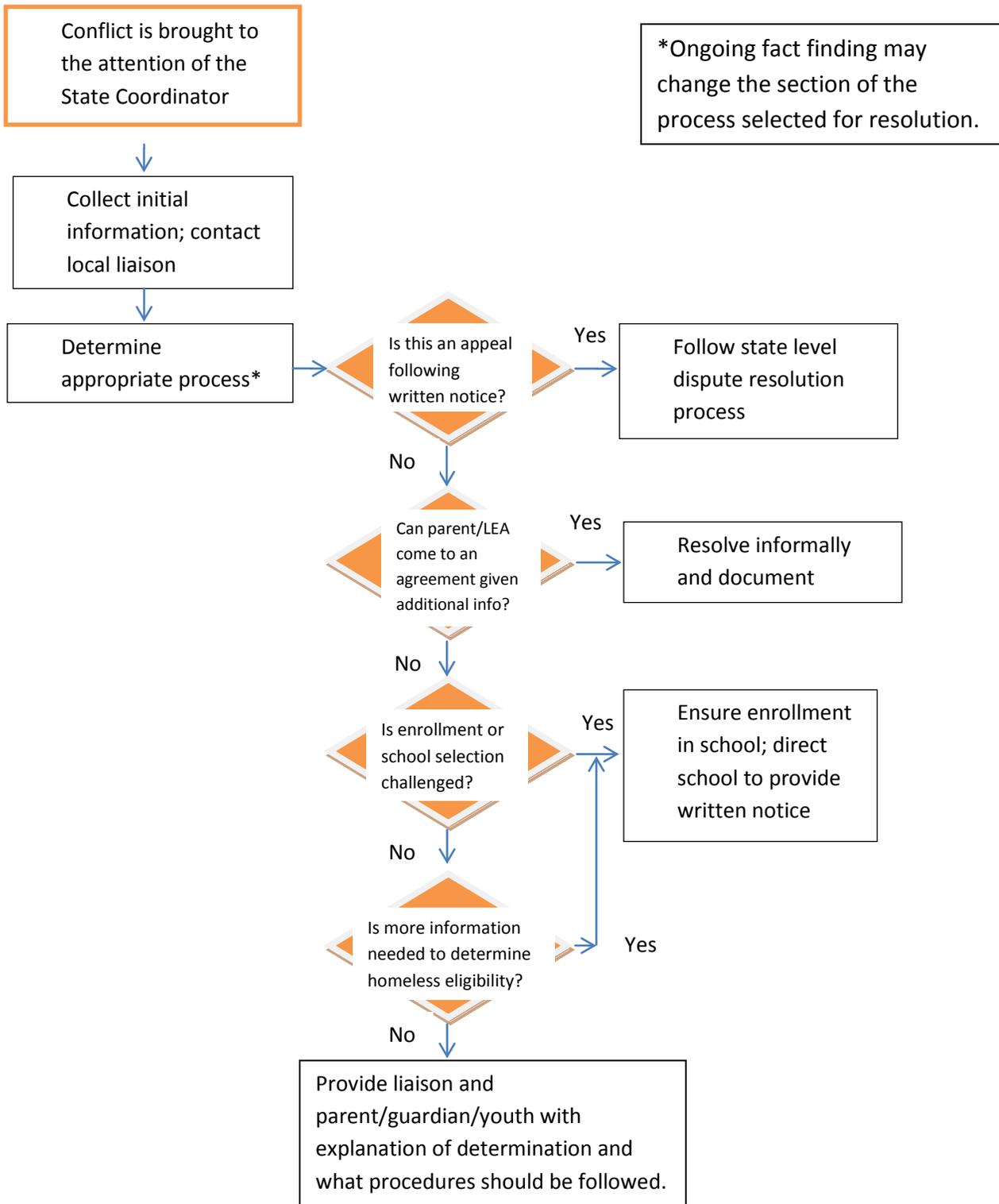
Type of Conflict	Examples
McKinney-Vento dispute resolution conflicts	<ul style="list-style-type: none"><li>• Disagreement about remaining in school of origin</li><li>• Disagreement about immediate enrollment in school of residency</li><li>• Disagreement about homeless status when student was appropriately identified as homeless previously (e.g., doubled-up in same location for two years)</li></ul>
Conflicts not appropriate for dispute resolution, but which are MV compliance issues	<ul style="list-style-type: none"><li>• School failed to inform of MV educational rights</li><li>• Student is not provided free meals</li></ul>

Type of Conflict	Examples
	<ul style="list-style-type: none"> <li>• Systemic non-compliance by an LEA which requires state intervention (failure to identify homelessness; lack of outreach and coordination within schools and community)</li> </ul>
Issues which do not implicate MV compliance, but address services which are allowable/beneficial	<ul style="list-style-type: none"> <li>• Preschool student could benefit from school of origin transportation</li> <li>• Additional activities could enhance homeless identification (e.g., using a residency questionnaire)</li> <li>• Summer school could improve student's academic performance but is not required to pass a course</li> </ul>
Non MV	<ul style="list-style-type: none"> <li>• Student wishes to enroll in a school that is not an option for students in the residency area and is not a school of origin</li> <li>• Parent disagrees with the services being offered in an IEP</li> <li>• Student never lost housing</li> </ul>

Figure 1 provides a graphic representation of the basic steps to be followed when a complaint/question from the field is received by the State Coordinator. Note that whenever possible, the first steps are to collect basic information and attempt to resolve the issue informally. State Coordinators should maintain records for issues resolved informally as well as those that require more formal interventions. Such information is critical to designing the guidance, resources and training needed in the state.

Appendix J.4 Basic intake information, includes suggestions for State Coordinators regarding information to collect at intake and through the resolution process, samples of common disagreements and steps to consider for resolution, and follow up letter templates that can be used along the resolution continuum.

Figure 1. A Differentiated Process to Address Conflicts



## J.7 Getting the facts: What is legal and what is reasonable

When a dispute arises under the McKinney-Vento Act, particularly in regard to eligibility, school districts may wish to look further into a family's or youth's situation to compile evidence in support of its position. *It is absolutely critical that all such efforts be grounded in sensitivity and respect, keeping the academic well-being and best interest of the child or youth in the forefront.* Invasive or threatening techniques to confirm eligibility or explore a family's or youth's situation violate the McKinney-Vento Act, may violate the Family Educational Rights and Privacy Act (FERPA), humiliate families and youth, and may put temporary housing arrangements in jeopardy.

Acceptable and unacceptable ways to gather facts about a family's or youth's situation can be found in the NCHC briefs on the do's and don'ts of confirming eligibility.<sup>32</sup> Additionally, many school districts and states have developed enrollment forms with informative, yet sensitive, questions to help determine eligibility and gather information.<sup>33</sup> State Coordinators may find the same questions helpful when navigating an appeal in a dispute process.

## J.8 Conclusion

The McKinney-Vento Act mandates that each homeless education state plan include a description of procedures for the prompt resolution of disputes regarding the educational placement of homeless children and youth. Furthermore, the Act mandates that LEAs immediately enroll the child or youth while a dispute is resolved; provide the parent, guardian, or youth with a written explanation of the decision and the right to appeal the decision; and refer the child, youth, parent, or guardian to the liaison, to carry out the dispute resolution process expeditiously. There is great flexibility in how SEAs and LEAs implement these requirements and how conflicts not covered by the dispute resolution process are addressed. This document provides State Coordinators with suggestions to meet the basics of a dispute resolution process, additional considerations based on the experiences of fellow Coordinators, and a decision-making process for determining appropriate methods of resolving a variety of conflicts. The appendices that follow offer additional tools that

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<sup>32</sup> These documents can be found at [http://center.serve.org/nche/ibt/sc\\_eligibility.php](http://center.serve.org/nche/ibt/sc_eligibility.php).

<sup>33</sup> Sample forms and questionnaires can be found at <http://center.serve.org/nche/forum/eligibility.php>.

may be adapted for use. State Coordinators are encouraged to share other tools they develop with NCHE as states continue to refine dispute and other conflict resolution processes.

**Appendix J-1. Sample Transportation Agreement**

This agreement remains in effect as long as the student:

- 1. Does not violate district transportation rules, and 2. Rides the bus regularly.

If the student is not present at the bus stop AND the student’s parent/guardian has not phoned the transportation office (###-###) in advance (before 6 am the day of pick-up) to notify them of changes in transportation plans on THREE (3) CONSECUTIVE SCHOOL DAYS, then the district will no longer provide transportation each morning for the student. Once the parent fails to comply with this Transportation Agreement, this contract is terminated and a bus will no longer pick-up the child. It then will be the parent’s responsibility to contact the school district transportation office to request reconsideration for district transportation. If transportation cannot accommodate the request, the parent will become responsible for the child’s transportation to school. This agreement applies to the student’s pick-up address and current school as noted below. NOTE: THE STUDENT MUST MEET THE DISTRICT’S REQUIREMENTS FOR TRANSPORTATION (2 MILES AWAY FROM SCHOOL, CROSSING BOARD-APPROVED HAZARDOUS ROUTES) BEFORE BEING ABLE TO ENTER INTO THIS CONTRACT.

Student’s Name: \_\_\_\_\_ Grade: \_\_\_\_\_  
School District: \_\_\_\_\_ Current School: \_\_\_\_\_  
Parent’s Name: \_\_\_\_\_ Phone #: \_\_\_\_\_  
Emergency Contact: \_\_\_\_\_ Phone #: \_\_\_\_\_  
Pick-up address: \_\_\_\_\_  
Drop-off address: \_\_\_\_\_  
Date when transportation will begin: \_\_\_\_\_  
Regular transportation: \_\_\_\_\_ Special Needs transportation (as noted in student’s IEP): \_\_\_\_\_

As the parent/guardian of the above-named student, I agree to make sure my child is waiting for the bus prior to its arrival each school morning OR I will phone the transportation office (###-####) prior to 6 am if the bus is not needed. I understand that if I fail to follow-through with these requirements, then the bus will no longer come to pick-up my child and I become responsible for making the necessary transportation arrangements to get my child to school.

\_\_\_\_\_  
Parent/Guardian Signature \_\_\_\_\_ Date \_\_\_\_\_  
\_\_\_\_\_  
Parent Liaison Signature (person who assisted parent with completing this form) \_\_\_\_\_ Date \_\_\_\_\_

A copy of this agreement must be given to the parent and faxed to the Transportation Office (###-####) immediately. The original must be kept on file in the Liaison’s office.

**Appendix J-2. Sample State Policy, Washington Dispute Resolution Process**  
**Office of Superintendent of Public Instruction**  
**MEMORANDUM NO. 071-09M, Attachment 1**  
**January 5, 2010**

Dispute Resolution Process  
Office of Superintendent of Public Instruction

**DISPUTE RESOLUTION PROCESS**  
**SCHOOL DISTRICT PLACEMENT OF CHILDREN AND YOUTHS**  
**IN HOMELESS SITUATIONS**

**BACKGROUND INFORMATION**

The McKinney-Vento Homeless Assistance Act (also referred to as the Act or the McKinney-Vento Act) acknowledges that disputes may arise between the school district and homeless students and their parents, or unaccompanied youth, when the district seeks to place a student in a school other than the school of origin or the school requested by the parent or unaccompanied youth. The Act includes dispute resolution among the required duties of the local education agency (LEA) liaison. The Washington State Office of Superintendent of Public Instruction (OSPI) has developed a dispute resolution process as required by the McKinney-Vento Act.

Districts should bear in mind that disputes related to school selection or enrollment should be initiated at the request of the parent or unaccompanied youth and not at the request or convenience of the school district. Additionally, issues related to the definition of homelessness, the responsibilities of the school district to serve homeless children and youth, and/or the explicit rights of homeless children and youth are addressed in the McKinney-Vento Act. Disputes related to the school placement and enrollment of homeless children and youths shall be resolved within the parameters of the federal McKinney-Vento Act. The dispute resolution process for the school placement of homeless children and youths shall not be used in an effort to circumvent or supersede any part of the federal McKinney-Vento Act.

The following procedures are specified in the Act:

**Enrollment:** If a dispute arises over school selection or enrollment in a school, the child or youth shall be immediately admitted to the school in which enrollment is sought, pending resolution of the dispute. In the case of an unaccompanied youth, the homeless liaison shall ensure that the youth is immediately enrolled in the school in which enrollment is sought, pending resolution of the dispute.

**Written Explanation:** The district must provide a written explanation of the school placement decision to the parent or, in the case of an unaccompanied youth, to the unaccompanied youth. (The written explanation must include a description of the parent’s or unaccompanied youth’s right to appeal the decision.)

**Liaison:** The designated LEA homeless liaison is assigned to carry out the dispute resolution process in an expeditious manner.

**Responsibility:** The school district, usually the district’s homeless liaison, is responsible to inform the parent of the homeless student(s) or the unaccompanied youth of the dispute resolution process.

## OVERVIEW

In a case where a dispute occurs regarding the enrollment of a homeless child or youth, the following process must be used: Level I of the appeal is to the district’s homeless liaison. If unresolved at this level, the case is appealed to the local school district superintendent (Level II), and if the dispute continues to be unresolved, the final appeal (Level III) is to OSPI. **Every effort must be made to resolve the complaint or dispute at the local level before it is brought to OSPI.**

## INITIATION OF THE DISPUTE RESOLUTION PROCESS

**If a school district seeks to place a homeless child or youth in a school other than the school of origin, or the school requested by the parent or unaccompanied youth, the child’s/youth’s parent or the unaccompanied youth shall be informed in a language and format understandable to the parent or unaccompanied youth of their right to appeal the decision made by the school district and be provided the following:**

1. Written contact information for the LEA homeless liaison and State Coordinator, with a brief description of their roles.
2. A simple, written detachable form that parents, guardians, or unaccompanied youth can complete and turn in to the school to initiate the dispute process (the school should copy the form and return the copy to the parent, guardian, or youth for their records when it is submitted.)
3. A written step-by-step description of how to dispute the school district’s decision.
4. Written notice of the right to enroll immediately in the school of choice pending resolution of the dispute.

5. Written notice of the right to appeal to the state if the district-level resolution is not satisfactory.
6. Written timelines for resolving district- and state-level appeals.

### **Level I: LEA Liaison Communication**

#### **If a parent or unaccompanied youth wishes to appeal a school district's decision related to a student's placement:**

1. The parent or unaccompanied youth must file a request for dispute resolution with the district's homeless liaison by submitting a form that initiates the dispute resolution process. The request for dispute resolution must be submitted by the parent or the unaccompanied youth to the district liaison within fifteen (15) business days of receiving notification that the district intends to enroll the student in a school other than that requested by the family or the unaccompanied youth. The parent or unaccompanied youth may submit the request directly to the homeless liaison or they may submit the request to the school where the dispute is taking place. If the request is submitted to the school where the dispute is taking place, the school shall immediately forward the request to the district's homeless liaison. In the event that the district's homeless liaison is unavailable, a school district designee may receive the parent's or unaccompanied youth's request to initiate the dispute resolution process.
2. The homeless liaison must log their receipt of the complaint, including the date and time, with a written description of the situation and the reason for the dispute, and a copy of the complaint must be forwarded to the liaison's immediate supervisor and the district superintendent.
3. Within five (5) business days of their receipt of the complaint, the liaison must make a decision on the complaint and inform the parent or unaccompanied youth in writing of the result. It is the responsibility of the district to verify the parent's or unaccompanied youth's receipt of the written notification regarding the homeless liaison's Level I decision.
4. If the parent or unaccompanied youth disagrees with the decision made at Level I and wishes to move the dispute resolution process forward to Level II, the parent or unaccompanied youth shall notify the district's homeless liaison of their intent to proceed to Level II within ten (10) business days of receipt of notification of the Level I decision.
5. If the parent or unaccompanied youth wishes to appeal the liaison's Level I decision, the district's homeless liaison shall provide the parent or unaccompanied youth with an appeals package containing:

- a. A copy of the parent's or unaccompanied youth's complaint which was filed with the district's homeless liaison at Level I,
- b. The decision rendered at Level I by the LEA liaison, and
- c. Any additional information from the parent, unaccompanied youth, and/or homeless liaison.

**Level II: LEA Superintendent Communication**

(If the dispute remains unresolved after a Level I appeal)

1. If a parent disagrees with the decision rendered by the district's homeless liaison at Level I, the parent or unaccompanied youth may appeal the decision to the local school district's superintendent, or the superintendent's designee, (the designee shall be someone other than the district's homeless liaison) using the appeals package provided at Level I.
2. The superintendent, or superintendent's designee, will arrange for a personal conference to be held with the parent or unaccompanied youth. The personal conference will be arranged within five (5) business days of the parent or unaccompanied youth's notification to the district of their intent to proceed to Level II of the dispute resolution process. Once arranged, the meeting between the superintendent, or superintendent's designee, and the parent or unaccompanied youth is to take place as expeditiously as possible.
3. The local superintendent, or superintendent's designee, will provide a decision in writing to the parent or unaccompanied youth with supporting evidence and reasons, within five (5) business days of the superintendent's, or superintendent's designee, personal conference with the parent or unaccompanied youth. It is the responsibility of the district to verify the parent's or unaccompanied youth's receipt of the written notification regarding the superintendent's Level II decision.
4. A copy of the appeals package, along with the written decision made at Level II is to be shared with the district's homeless liaison.
5. If the parent or unaccompanied youth disagrees with the decision made at Level II and wishes to move the dispute resolution process forward to Level III, the parent or unaccompanied youth shall notify the district's homeless liaison of their intent to proceed to Level III within ten (10) business days of receipt of notification of the Level II decision.
6. If the dispute remains unresolved, the process then moves to Level III.

**Level III: Office of Superintendent of Public Instruction (OSPI) Communication**

(If the dispute remains unresolved after a Level II appeal)

1. The district superintendent shall forward all written documentation and related paperwork to the OSPI homeless education coordinator, or designee, for review, within five (5) business days of notifying the parent or unaccompanied youth of the decision rendered at Level II.
2. The entire dispute package including all documentation and related paperwork is to be submitted to OSPI in one consolidated and complete package via hard copy mail delivery. Documents submitted separately from the dispute package, documents submitted after the fact, or documents submitted outside of the dispute package in an attempt to extend the dispute timeframe or impact a pending dispute outcome may not be reviewed by OSPI. It is the responsibility of the district to ensure that dispute packages are complete and ready for review at the time they are submitted to OSPI.
3. The OSPI homeless education coordinator, or designee, along with the appropriate agency director, and/or agency assistant superintendent, shall make a final decision within fifteen (15) business days of receipt of the complaint.
4. The final decision will be forwarded to the local school district's homeless liaison for distribution to the parent and the local superintendent.
5. The decision made by OSPI shall be the final resolution for placement of a homeless child or youth in the district.
6. The office of the school district superintendent shall maintain a record of all disputes related to the placement of homeless children and youths. These records shall include disputes resolved at Level I, Level II, and/or Level III and shall be made available to OSPI upon request.

### INTER-DISTRICT DISPUTES

**If a dispute arises over school selection or enrollment in a school, the child or youth shall be immediately admitted to the school in which enrollment is sought, pending resolution of the dispute. In the case of an unaccompanied youth, the homeless liaison shall ensure that the youth is immediately enrolled in school pending resolution of the dispute.**

Disputes arising between school districts (LEAs) regarding the placement of a homeless child or youth in a district should be resolved between the districts at the local level in the best interest of the child and according to the law. Disputes between LEAs that remain unresolved shall be forwarded in writing by either of the disputing districts to the OSPI homeless education coordinator, or designee. A decision will be made by the OSPI homeless coordinator, or designee, along with a committee of OSPI staff within ten (10) business days of the receipt of the dispute and will be forwarded in writing to the districts' superintendents, the districts' homeless liaisons and the parent(s) of the homeless child, or the homeless youth.

The decision made by OSPI shall be the final resolution between the disputing LEAs for placement of a homeless child or youth in a district.

**McKinney-Vento Homeless Education Act of 2001**  
**42 U.S.C. §§ 11431, et. seq. (Chapter 119) , as amended by the**  
***No Child Left Behind Act.***

## **POLICY STATEMENT**

### **Section 721(l)(2) of the McKinney-Vento Homeless Education Act:**

The following is the policy of the Congress:

- (1) Each State educational agency shall ensure that each child of a homeless individual and each homeless youth has equal access to the same free, appropriate public education, including a public preschool education, as provided to other children and youths.
- (2) In any State that has a compulsory residency requirement as a component of the State's compulsory school attendance laws or other laws, regulations, practices, or policies that may act as a barrier to the enrollment, attendance, or success in school of homeless children and youths, 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.
- (3) Homelessness alone is not sufficient reason to separate students from the mainstream school environment.
- (4) 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 student academic achievement standards to which all students are held.

## **DEFINITIONS**

**Homeless Children and Youths:** According to Section 725(2) of the McKinney-Vento Homeless Education Act, "the term 'homeless children and youths'--

- (A) means individuals who lack a fixed, regular, and adequate nighttime residence (within the meaning of section 103(a)(1)) [‘one who (1) lacks a fixed, regular, and

adequate residence or (2) has a primary nighttime residence in a supervised publicly or privately operated shelter for temporary accommodations (including welfare hotels, congregate shelters, and transitional housing for the mentally ill), an institution providing temporary residence for individuals intended to be institutionalized, or a public or private place not designated for, or ordinarily used as, a regular sleeping accommodation for human beings.']; and

- (B) includes--
- (i) 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; are abandoned in hospitals; or are awaiting foster care placement;
  - (ii) children and youths who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings (within the meaning of section 103(a)(2)(C));
  - (iii) children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and
  - (iv) migratory children (as such term is defined in section 1309 of the Elementary and Secondary Education Act of 1965) who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (i) through (iii)."

Section 103(c) of the Act specifically excludes from the definition of homeless individuals any person who is imprisoned or otherwise detained by Act of Congress or State law.

**Unaccompanied Youth:** Section 725(6) of the Act indicates that the term "unaccompanied youth" includes a youth not in the physical custody of a parent or guardian." Youth living on their own in any of the homeless situations described in the law, are covered by the law.

**Fixed Residence:** A residence that is stationary, permanent, and not subject to change.

**Regular Residence:** A residence which is used on a regular (i.e., nightly) basis.

**Adequate Residence:** A residence which is sufficient for meeting both the physical and psychological needs typically met in home environments.

**Parent:** For the purpose of this policy, a parent means a parent, legal guardian, or person having legal custody of a child.

**School of Origin:** The school of origin, as defined in the McKinney-Vento Homeless Education Act, Section 722 (g)(3)(G), is the school that the child or youth attended when permanently housed or the school in which the child or youth was last enrolled.

**Enrollment:** The terms “enroll” and “enrollment” include attending classes and participating fully in school activities.

### Appendix J-3. Links to State Dispute Resolution Processes

#### California Department of Education Dispute Resolution Process

This webpage details the McKinney-Vento dispute resolution process established by the [California Department of Education](#).

 View the [process](#).

#### Cobb County School District (Atlanta, GA) Dispute Resolution Forms

This policy and related forms detail the McKinney-Vento dispute resolution process established by the [Cobb County School District](#).

 View the [complete enrollment policy](#).

 Download the Appeal of Enrollment Form [in English](#). (see page 2)

 Download the Appeal of Enrollment Form [in Portuguese/em português](#).

 Download the Appeal of Enrollment Form [in Spanish/en español](#).

 Download the [Written Notification of Enrollment Decision Form](#).

#### Kentucky Department of Education Dispute Resolution Policy and Forms

The [Kentucky Department of Education](#) follows this policy, and uses related forms, to resolve disputes regarding the enrollment of children and youth experiencing homelessness.

 Download the [dispute resolution policy](#).

 Download the [dispute resolution form](#).

#### Massachusetts Department of Education Dispute Resolution Process

This advisory and related forms detail the McKinney-Vento dispute resolution process established by the [Massachusetts Department of Education](#).

 View [Advisory 2003 - 7: McKinney-Vento Homeless Education Dispute Resolution Process](#).

 Download [Advisory 2003 - 7A: School District Notification of Enrollment Decision](#).

 Download [Advisory 2003 - 7B: Appeal of School District's Enrollment Decision](#).

#### Oregon Department of Education Dispute Resolution Procedure for Homeless Students and Families

This form from the [Oregon Department of Education](#) details how Oregon school districts should handle disputes regarding the enrolling and serving of students experiencing homelessness.

 Download the [form](#).

#### San Antonio Independent School District (SAISD) Enrollment Dispute Form

This form (available in English and Spanish versions) serves as the written notice provided to the family/student by the [San Antonio Independent School District](#) in the case of an enrollment dispute. The student's appeal rights are detailed therein.

 Download the form [in English](#).

 Download the form [in Spanish \(en español\)](#).

#### Virginia Department of Education Dispute Resolution Process

This webpage details the McKinney-Vento dispute resolution process established by the [Virginia Department of Education](#). It also provides links to related forms mentioned in the process.

 View the [process](#).

#### Illinois Dispute Resolution Processes, available online at:

This webpage details the McKinney-Vento dispute legislation in [Illinois](#) and the dispute resolution forms and processes can be found [here](#).

## Appendix J-4. Basic intake information

### Information to include in an intake form when a call or email is received

Person completing form:	
Date:	
Person calling:	
Relationship to students:	
Location:	
Phone number(s):	
School district(s):	
School(s):	
Age(s)/grade(s) of student(s):	
Family situation:	
Current housing situation:	
Housing/homeless history:	
Concerns/complaints:	
Resolution desired:	
If eligibility as homeless is an issue, was an eligibility checklist used?	
Did the liaison help the family understand why the living situation should not be considered homeless?	
If school selection is an issue, was a best interest determination conducted? <sup>1</sup>	
Follow up with liaison: (date and narrative)	
Resolution:	

Consult flowchart to determine next steps [Link back to the flowchart or copy here.](#)

State Coordinator may collect information for this process.<sup>2</sup>

<sup>1</sup> LEA Liaison Toolkit includes a [best interest determination worksheet](#).

<sup>2</sup> Sample forms/checklists can be found at [http://center.serve.org/nche/ibt/sc\\_dispute.php](http://center.serve.org/nche/ibt/sc_dispute.php)

### Appendix J-5. Common Disagreements

(These examples are for illustrative purposes, only. Actual cases will have nuances not captured in the simplistic basic issues.)

Basic Issue	Steps to Resolving
The student is seeking enrollment in the school for the current residency area. (Homeless status is not contested.)	School must enroll immediately. (SC may use noncompliance letter if school refuses.)
The student is seeking enrollment in a school other children in the residency area may attend.	Immediate enrollment unless some other criteria are not met (for example, an arts charter school with admissions requirements related to artistic ability). If other criteria are not met, school should follow normal process for denying request. State Coordinator may use non MV letter template.
The student wishes to remain in a school of origin and the school disagrees.	Ensure a feasibility/best interest determination has been conducted and documented. School provides written notification and follows dispute resolution process.
The school questions the actual residency of the student at enrollment.	If more information is needed to make a determination, school should immediately enroll pending information collection. (Use care and sensitivity in the verification process.) If the student is not residing in the area to attend the school and the school is not a school of origin, follow normal process for denying request. State Coordinator may use nonMV letter template.
The school challenges the student's status as homeless.	<ul style="list-style-type: none"> <li>a. School provides written notification and follows dispute resolution process. (The school may use the sample determination template for parents when not MV eligible as part of the written notice.)</li> <li>b. <i>If more information is needed, or the living situation is not easily categorized:</i> Liaison should consult with State Coordinator. State Coordinator may consult with USED or NCHE for technical assistance.</li> </ul>
The student is seeking enrollment in a school which is not a school of origin or school of residency (including schools in which students in the attendance area may enroll).	Issue is not McKinney-Vento; provide parent, guardian, or youth with explanation and possible avenues to appeal outside MV.
The student does not meet the eligibility	Issue is not McKinney-Vento; provide parent, guardian,

Basic Issue	Steps to Resolving
criteria to participate in a school activity and criteria are not associated with homeless status (e. g., GPA is too low to participate in a sport).	or youth with explanation and possible avenues to appeal outside MV.
The student has an IEP and the parent is not satisfied with the special education program provided.	Special education will need to participate in the resolution. If specifics of the case involve homeless status, include the liaison/State Coordinator in the resolution. If the issue is not McKinney-Vento related, the parent, guardian, or youth should follow IDEA processes.
Best interest determination was conducted and is not being appealed; transportation to school of origin was not provided.	This is a compliance issue; the State Coordinator should intercede with the LEA. (See sample non-compliance template)
School of origin transportation was offered but parent/guardian/youth does not accept the option offered.	<p>State Coordinator should consider these questions before advising the school:</p> <ul style="list-style-type: none"> <li>Is the option offered safe?</li> <li>Does the option offered avoid stigmatizing due to homelessness?</li> <li>Does the option impose extraordinary inconvenience on the student (e.g., excessive transfers, unnecessary and excessively long commute time)?</li> <li>Does the parent/guardian/youth request exceed the requirements of the Act (e.g., door-to-door service)?</li> </ul> <p>If the transportation offered is safe and does not stigmatize based on homeless status, the school has met its obligation under MV; inform the parent/guardian/youth.</p> <p>If the option offered is unsafe or stigmatizing, the state coordinator should work with the liaison to explore other options, including the possibility of revisiting the best interest determination.</p>

## Appendix J-6. Non-Compliance Template

Local liaison  
School District  
Address

Date

Dear

I am writing to inform you that School District \_\_\_\_ is out of compliance with the Education of Homeless and Youth Program requirements of the McKinney-Vento Homeless Assistance Act. According to Section 722(g)(2), the state is responsible for LEA compliance with these requirements and for the provision of technical assistance to local educational education in fulfilling these requirements.

*Provide code section(s) that are not being followed:*

According to section ###, the LEA "insert citation."

*Explain actions/lack of action by the LEA that has been brought to the attention of the State Coordinator:*

Description of fact-finding that led to the compliance letter.

*Offer steps to be taken by the LEA to resolve the issue.*

The following steps should be considered to resolve the current compliance matter:

*Identify technical assistance available from the state coordinator and/or designee(s).*

To assist you in these efforts, the following resources are available:

Please provide my office with an action to address this concern by \_\_\_\_\_ date. I look forward to the resolution of this matter in a timely fashion and am available to assist you.

Sincerely,

## Appendix J-7. Sample Template for Parents When Student is Not Considered McKinney-Vento Eligible

Parent/Guardian/Youth  
Address

Date

Dear

This letter is in response to your contact with my office on *date*, requesting McKinney-Vento assistance for *student's name* in *school/school district*. Based on the information provided, *student's name* does not meet the definition of homeless under the McKinney-Vento Education for homeless children and youth (EHCY) program. General enrollment eligibility and procedures for the school in question would apply.

Section 725 of the Act defines homeless children and youth for EHCY:

(2) The term `homeless children and youths'-- (A) means individuals who lack a fixed, regular, and adequate nighttime residence (within the meaning of section 103(a)(1)); and (B) includes-- (i) 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; are abandoned in hospitals; or are awaiting foster care placement; (ii) children and youths who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings (within the meaning of section 103(a)(2)(C)); (iii) children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and (iv) migratory children (as such term is defined in section 1309 of the Elementary and Secondary Education Act of 1965) who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (i) through (iii).

None of the categories above describe *student's name* living situation. Explain why. (Include documentation of any vetting with national partners here or precedence the State Coordinator has on file.)

Furthermore, the checklist<sup>1</sup> used to make this determination is attached. Should you have further questions, please feel free to contact my office.

Sincerely,  
cc: Local homeless education liaison

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<sup>1</sup> You may consider creating a checklist that can be used.

## Appendix J-8. Sample Determination Template for Parent When Not a McKinney-Vento Issue

Parent/Guardian/Youth

Address

Date

Dear

This letter is in response to your contact with my office on date, requesting McKinney-Vento assistance for *student's name* in *school/school district*. You requested (explain request)

This request is not addressed as a requirement of the McKinney-Vento Education for Homeless Children and Youth (EHCY) program. There may be other avenues that can be explored to meet your request.

- This appears to be a special education issue. You may wish to contact \*\*\*list the state contact for IDEA compliance, the state's parent ombudsman, or special education technical assistance\*\*\*\*
- Your request may be appealed through the school district's normal appeal process. *Liaison's name*, should be able to connect you with the proper central office staff.

Should you have further questions, please feel free to contact my office.

Sincerely,

cc: Local homeless education liaison

## **Section K. Strengthening Services for Native American Students Experiencing Homelessness: The Power of Relationships**

### **K.1 Introduction/Purpose**

The purpose of this document is to build the capacity of State Educational Agencies (SEAs) and Local Educational Agencies (LEAs) to provide appropriate and effective services for Native American children in homeless situations. The information provided here is intended to guide State Coordinators toward a deeper appreciation and understanding of the unique features of homelessness experienced by Native American families, children and youth. The optimal outcome is for readers to develop a plan to identify key partners who can assist with building collaborative networks to improve educational services for Native American students experiencing homelessness in their respective states.

The need for a deep understanding of Native American cultures is of critical importance in strengthening services. However, because of the great diversity among various Native American tribal communities, producing a “guide” or “handbook” that honors the integrity of each culture is challenging. For this reason, this document will serve more as a needs assessment tool, with a series of questions that will lead State Coordinators to explore the demographics, resources, existing partnerships, and opportunities for enhanced collaboration that are unique to their respective states.

In addition to the Critical Questions for Needs Assessment section, the document also features information on past and current efforts to address the many challenges related to the education of Native American students. These efforts include a series of federal initiatives as well as information about state specific efforts to address the educational needs of Native American students, including state laws, grant projects, and various collaborative efforts by states or communities that have formed coalitions on behalf of Native American children and youth. Links to examples of already established, successful initiatives are provided.

Finally, this document features a selection of links to national, state, and local resources. While not exhaustive, these lists do represent, in general, the types of organizations, projects, or resources that can be explored by State Coordinators seeking to learn of existing partnerships and collaborative opportunities to address the educational

stability of Native American students experiencing homelessness. It must be noted that while the topic of homelessness in general may be included in discussions among these collaborative groups, the McKinney-Vento Act may not always be specifically addressed in these discussions. State Coordinators are urged to look for opportunities to bring McKinney-Vento into the dialogue as new partnerships or collaborative efforts are explored. Please note: the terms American Indian (AI), American Indian/Alaska Native (AI/AN), Indian and Native American (NA) will be used interchangeably.

## **K.2 Some notes on context**

State Coordinators are urged to consider the following points as they seek strategies to improve services for highly mobile Native American children:

- 480,000 American Indian and Alaska Native students are educated in public school systems.
- Approximately 42,000 American Indian students are enrolled in a school system operated by the Bureau of Indian Education (BIE).
- BIE schools were created by the federal government expressly to serve Indian children of elementary and secondary school age in reservation communities. Currently, two-thirds of the 183 BIE schools and dormitories are tribally controlled and operated.
- BIE schools operate in 23 states: WA, OR, CA, NV, ID, MT, WY, AZ, NM, ND, SD, OK, MN, IA, LA, MS, WI, MI, NC, FL, ME, UT, and KS.
- BIE maintains a list of tribes located in each state
- States in which Native American students comprise the largest proportions of the total student populations include Alaska (23%), Oklahoma (19%), South Dakota (12%), Montana (11%), New Mexico (10%), and North Dakota (9%).
- Existing organizations in these states need to be invited to collaborate as Native American students are identified as McKinney-Vento eligible and as appropriate services are identified and provided.
- There are 566 federally-recognized Indian tribes in the United States; each tribe has its own unique set of customs, values, traditions, cultural features and is affiliated to an indigenous

language family. It should be noted that federal recognition represents official acknowledgement by the United States of the political status of the tribe as a government.

- Given the significant diversity among the various tribes, State Coordinators are encouraged to avoid stereotypes and/or any assumptions without verifying the uniqueness of the individual tribal communities in their state.
- Historical trauma is a topic of interest to researchers, educators, and others in exploring the impact of this shared experience in the lives of Native American children and families.
- There are substantial gaps in our knowledge about Native American student achievement compared to our knowledge of the achievement of other racial/ethnic groups. Data collection efforts often are compromised by the small sample size of Native American students in many school settings.
- The 2007 National Indian Education Study indicated that American Indian and Alaska Native students scored significantly lower than their peers in both fourth and eighth grades.
- American Indian and Alaska Native students face some of the highest dropout rates in the country.
- The NAEP – NIES 2011 data summaries are available for review [here](#); it is noted that only twelve states had samples of American Indian/Alaska Native students large enough to report results separately at the state level.
- There is wide variance among states in the collection data specific to Native American students; State Coordinators are encouraged to work with SEA data specialists to determine availability of data for these students.
- Appendix K-1 Sampling of Key Organizations has a useful list of organizations that address Native American education issues.
- Appendix K-2 Resource Documents/Suggested Reading provides a reference list of research articles and information about serving Native American students.

### **K.3 Federal and state partners in Indian Education**

Indian tribes are deeply invested in improving education and believe that strengthening tribal control over education is the key to the success of Native American students. Tribal

involvement is increasing in the operation of BIE schools, and BIE's federal employees are encouraged to work with tribal school boards selected from the Indian communities where schools are located.

Tribal Educational Agencies (TEAs), sometimes referred to as Tribal Education Departments (TEDs), or Education Divisions, are increasing in number and are addressing issues in American Indian education. TEAs are responsible for many of the functions for which an SEA would be responsible, including the establishment of educational policies and regulations, collection and analysis of education data, and other functions related to curriculum and assessment of progress for Indian students. Currently serving thousands of tribal students nationwide in BIE, tribal, and public schools, TEAs are increasing their efforts to strengthen the education provided to their tribal communities and students by partnering with federal and state governments. Congress has authorized funding for TEAs under the Bureau of Indian Affairs (BIA) of the Department of Interior, and in the U.S. Department of Education's budget; however, such funding is generally described as inadequate relative to need. It should be noted that a current grant initiative administered by the U.S. Department of Education, the State Tribal Education Partnership (STEP), supports an increased role for TEAs in public education, promotes collaboration between TEAs and SEAs, and encourages more meaningful participation in public education on tribally controlled land. [2012 STEP grants](#) were awarded in Oklahoma, New Mexico, Oregon, and Idaho.

The U.S. Department of Education is committed to strengthening educational services in Native American communities. The Office of Indian Education (OIE), housed within the Office of Elementary and Secondary Education (OESE), states that its mission is:

*to support the efforts of local educational agencies, Indian tribes and organizations, postsecondary institutions, and other entities to meet the unique educational and culturally related academic needs of American Indians and Alaska Natives so that these students can achieve to the same challenging state standards as all students.*

Title VII of the Elementary and Secondary Education Act (ESEA), as amended, authorizes the Indian, Native Hawaiian, and Alaska Native Education Programs (Parts A-C, respectively). Furthermore, Title VIII of the ESEA, the Impact Aid program, authorizes direct payments to

public school districts to offset the loss of traditional property taxes due to the presence of federal activity, including the presence of federally recognized native lands. Since public schools cannot draw tax revenue from Indian land or sales made on Indian land, many of the Indian impacted school districts are highly dependent on these Federal education resources to operate.

Office of Indian Education grant initiatives include the Indian Education Formula Grants, Demonstration Grants for Indian Children, Indian Professional Development Grants, and the State Tribal Education Partnership (STEP) awards noted earlier. Information about current competitions and past awards can be accessed on the [OIE/OESE webpage](#).

The U.S. Department of the Interior and the U.S. Department of Education jointly host Tribal Consultation Meetings, convened quarterly in various locations across the United States to address Indian Education issues. Resulting from the White House Initiative on American Indian and Alaska Native Education, Tribal Consultations are predicated on the government-to-government relationship between tribes and the Department of Education. By providing tribal leaders and education stakeholders a forum for discussion, these meetings target closing the achievement gap between Indian and non-Indian students, decreasing drop-out rates, and preserving and revitalizing Native languages. Full transcripts of these meetings are available on the [OIE/\(OESE\) website](#).

It should be noted that twenty-four states have an SEA contact person designated for the State Department of Indian Education. These contacts have primary oversight over Indian Education programs in their respective state. The Office of Indian Education maintains an updated list of these contacts at which can be accessed [here](#).

#### **K.4 Legislation enacted to address Native American Education**

Over a period of years, the U.S. Congress has enacted federal legislation addressing the education of Native American students. Landmark federal legislation and Executive Orders addressing the education of Native American students are listed in the following chart:

**Table K-1 Landmark federal legislation and Executive Orders addressing the education of Native American students**

Year	Legislation Enacted
2011	President’s Executive Order on Improving American Indian and Alaska Native Education Opportunities and Strengthening Tribal colleges and Universities, No. 93512
2004	President’s Executive Order on American Indian and Alaska Native Education, No. 13336
2000	President’s Executive Order on Indian Education
1996	Native American Educational Assistance (Amends Indian Self-Determination and Education Assistance Act)
1994 1972	Indian Education Assistance Act
1992 1990	Native American Languages Act
1988 1974 1972	Indian Education Act
1988 1975	Indian Self-Determination and Education Assistance Act
1988	Tribally Controlled Schools Act
1978	National Indian Child Welfare Act
1965	Head Start Act
1958 1934	Johnson O’Malley Act

In addition to federal activity, many states have also enacted legislation to further address Indian Education issues. A source of state-specific information is available from the Native American Rights Fund’s publication, [Compilation of State Indian Education Laws](#), which contains information about the education laws of 39 states.

Some noteworthy examples of state specific legislation include: Montana’s Indian Education for All Act, requiring that all of Montana’s children learn the histories and cultures of the 12 tribes and seven reservations across the state; South Dakota’s Indian Education Act, establishing the Office of Indian Education, the Indian Education Advisory Council, and the American Indian Language Revitalization Program; and New Mexico’s Indian Education Act,

ensuring equitable and culturally relevant learning environments, maintenance of native languages, collaboration with other states and entities, and establishing an Indian Education Advisory Council.

Other examples of state specific legislation are found in the [Compilation of State Indian Education Laws](#).

Other significant state, regional, and/or local initiatives are worthy of note. While not necessarily required by law, groups have collaborated to engage in dialogue targeting improving educational opportunities for Native American students, in some cases securing grant or similar funding to implement programs to strengthen education for this student population.

A noteworthy example of such a coalition is the [Wyoming Tribal Children's TRIAD](#), a partnership composed of over two dozen entities, including tribal governments and programs, community organizations working with families and children, along with schools and education-related associations. Launched in 2009 through the cooperation of the Wyoming Department of Education and the Arapaho and Shoshone Tribal Councils, the TRIAD Partnership seeks to improve school enrollment, attendance, and achievement rates among Tribal children, thus helping them to succeed in school and life.

State Coordinators are encouraged to look for similar examples of interagency collaboration, especially in states with significant numbers of Native American students, and work toward ensuring that the McKinney-Vento Act is part of the conversation. One example of collaboration through the McKinney-Vento Act is in the Browning, Montana, school district, which established a McKinney-Vento Committee that includes representatives from agencies and service providers for the Blackfeet Indian Reservation. Additionally, the Gallup, New Mexico, McKinney-Vento program coordinates with the Southwest Indian Foundation. Caseworkers from the foundation provide services for Native American families who have lost their housing and refer the families with school-aged children to the local homeless liaison in the school district to ensure that the children receive services through the McKinney-Vento program.

## K.5 Critical questions for Needs Assessment

The following clusters of questions are offered to support State Coordinators in their efforts to assess the demographics, existing programs and resources, issues, and collaborative opportunities in their respective states.

1. Does my SEA have a designated State Education Agency Indian Education contact person for my state? Yes. Check list [here](#).
2. Is there a “program” within my SEA that addresses Indian Education issues? Is there any information on the SEA website about this program? Some SEAs and some LEAs have appointed a Title VII contact person, who may or may not also serve as the Indian Education contact. This person might be able to answer many of the questions in this needs assessment process. You are encouraged to make this connection as early as possible in your efforts to gather your state-specific information.
3. How many tribes are located in my state? How many of the tribes are federally recognized? Where are they located? Are there any apparent cultural differences between and among the tribes in my state? What do I need to know about the impact of this tribal diversity in my state? Whom do I ask?
4. How many Native American children of school age reside in my state? Do these children attend public schools, state-chartered charter schools, BIE schools, reservation schools, or tribally operated schools? How many of the students arrive in my state for purposes of attending boarding schools? Is there evidence of high mobility among these students resulting in frequent changes in school enrollment?
5. Is there any available data on levels of poverty, homelessness, dropout, child welfare, or juvenile justice involvement relative to Native American students in my state? What conversations about the educational and related needs of Native American students are taking place? How do we know what the needs of the students in our state and communities are?
6. What unique issues related to child welfare and foster care, including kinship care, are there for Native American students in my state, and how do these issues impact the McKinney-Vento eligibility determination of children awaiting foster care placement?

7. What types of services are available to Indian children experiencing homelessness that go beyond state and local community services (e.g., The Indian Health Act)? What supports are lacking?
8. Are there any Tribal Education Agencies (TEAs) in my state? If so, what is the current level of communication and collaboration between the TEA and SEA?
9. Are there any BIE schools in my state? Where are they located? What types of schools (boarding, day school, reservation school, contract/grant school, etc.) are they? What networking opportunities should I consider pursuing in support of Native American students experiencing homelessness or high mobility?
10. Is my state the site for an Education Line Office (ELO) supported by BIE? If so, what communication exists between SEA and ELO? Between ELO and LEAs? Are there any joint training opportunities that would be of mutual benefit regarding the implementation of McKinney-Vento in communities with high numbers of Native American students?
11. Is there a high level of mobility of Native American students between public schools and BIE or tribally operated schools? What kinds of circumstances trigger movement? What kind of communication exists with tribes surrounding this movement? Note that Title VII Coordinator, in states and/or LEAs that have one, may be in touch with native families as they move.
12. Has my state legislature enacted any specific laws that impact the education of Native American students? What do these laws require? (Note: The Native American Rights Fund has compiled the education laws of 39 states in their document, [Compilation of State Indian Education Laws](#).)
13. What projects, initiatives, coalitions, or collaborative efforts have resulted from these laws in my state?
14. Is there a statewide Indian Education Advisory Council, or similar group, whether established by law or by communities coming together around common goals? Most states have established Commissions or Committees on Indian Affairs. This [link](#) provides information and further links to specific legislative or executive initiatives.

15. Are there any statewide, regional or local coalitions, projects, or other efforts that would offer an opportunity to bring McKinney-Vento into the discussion and build a more collaborative network to serve Native American students experiencing homelessness?
16. Are there any federal grant projects being implemented in my state, either statewide or local, involving higher education or K-12 (e.g., STEP Awards, demonstrations grants, etc.)? Are there any reports, proceedings, or other documents available that describe the work of the project?
17. Has any existing group created a directory of organizations or service providers in my state that would provide contact information for potential collaboration?
18. Are there colleges, universities, or community colleges in my state that may be involved in education initiatives for Native American students? (Note USDE 2012 Indian Education Professional Development Grant Awards: AZ, CA, MT, OR, SD, WI, WY.) Further information is available [here](#).
19. What types of statewide or local agencies in my state provide services to Native American students and/or their families? What opportunities exist for increased coordination between and among agencies as families move between public schools, BIE schools, and/or tribal/reservation schools?
20. What services are currently available for Native American students? Within the SEA or LEA (such as Title I and Title VII)? Through BIE/ELOs, or local tribal services? Other local community agencies?
21. Based on the analysis of data I am gathering, what districts or regions in my state are most heavily impacted by Native American students experiencing homelessness? What additional technical assistance and training can I offer from the state level to help districts meet the unique needs of the students? Whom should I involve in these trainings?
22. Is educational support provided through BIE or tribal governments for students attending public schools?
23. What organizations and individuals should be invited to join a coalition to develop a plan to ensure that Indian children are best served by all systems, including the statutory supports of McKinney-Vento?

## **K.6 Recommendations for moving the dialogue forward**

The information and needs assessment questions in this document are offered to guide the State Coordinator toward a deeper understanding of the unique challenges of providing appropriate and effective educational services to Native American students who are experiencing homelessness. The reader is urged to think critically about how and where to obtain the most accurate information available about the current status of education for Native American students and how to build a strong collaborative network representing all stakeholders with interest in improving educational opportunity for this often under-served student population. In summary, some suggested next steps might include:

1. Make connections with your SEA Indian Education Coordinator and other key stakeholders at the state level to become familiar with the unique circumstances and needs of Indian children experiencing homelessness; determine what resources are available to these children and their families and how to refer families to needed resources.
2. Create a task force comprised of SEA, LEA, and Indian service agencies to address the needs of Indian children and youth; increase everyone's awareness of educational challenges that are faced by Indian children and youth experiencing homelessness.
3. Invite Indian educators, administrators, tribal leaders, and service providers to participate in McKinney-Vento trainings; provide trainings that will benefit SEAs and LEAs in addressing the needs of Indian children experiencing homelessness.
4. Consider ways to plan joint trainings in which agenda and content are shared among SEA, LEA, and tribal representatives for purposes of deeper understanding of respective issues and concerns.
5. Request meetings with your SEA data specialist to determine the adequacy of data collection specific to Native American students; brainstorm additional data elements that might be collected relative to homelessness for this student group.
6. Establish regular contact with another State Coordinator whose state demographics are similar to yours for purposes of sharing ideas and promising practices in addressing these challenges.

## Appendix K-1. A Sampling of Key Organizations

The importance of developing, strengthening, and maintaining strong partnerships cannot be overstated. State Coordinators are urged to familiarize themselves with the various national and state level organizations that address the education of Native American students and to consider strategies for outreach to build new partnerships on behalf of Native American students experiencing homelessness. The following list provides links to existing organizations that address Native American education issues. State Coordinators are encouraged to visit specific tribal websites located in their respective states.

[Bureau of Indian Education](#)

[United South and Eastern Tribes, Inc.](#)

[Office of Indian Education at US  
Department of Education](#)

[American Indian Higher Education  
Consortium](#)

[National Indian Education Association](#)

[National Indian Head Start Directors  
Association](#)

[National Congress of American Indians](#)

[American Indian Graduate Center](#)

[National Advisory Council on Indian  
Education](#)

[National Johnson O'Malley Association](#)

[Native American Rights Fund](#)

[Alaska Federation of Natives](#)

[National Indian Child Welfare Association](#)  
(Indian Child Welfare Act)

[Native Hawaiian Education Association](#)  
[www.nhea.net](http://www.nhea.net)

[Indian Health Services](#) (Medical programs)

[Native Hawaiian Education Council](#)

National Center for Education Statistics  
([National Indian Education Study](#))

[Tribal Education Departments National  
Assembly](#)

[American Indian Education Foundation](#)

## Appendix K-2. Resource Documents/Suggested Reading

- Demmert, W., Grissmer, D., Towner, J. (2006). A review and analysis of the research on Native American Students. *Journal of American Indian Education*, (45)3, 5-23. Retrieved from [http://jaie.asu.edu/v45/45\\_3\\_%202006%20%20Demmert%20et%20al.pdf](http://jaie.asu.edu/v45/45_3_%202006%20%20Demmert%20et%20al.pdf) .
- Hale, L. (2002). *Native American education: A reference handbook*. Santa Barbara, CA: ABC CLIO, Inc.
- Lomawaima, K.T., McCarty, T.L. (2002). When tribal sovereignty challenges democracy: American Indian education and the democratic ideal. *American Education Research Journal*, (39)2, 279-305.
- Mackety, D.M., Bachler, S., Barley, Z., & Cicchinelli, L. (2009). *American Indian education: The role of tribal education departments*. Denver, CO: McREL. Retrieved from: <http://www.ed.gov/edblogs/whiaiane/files/2012/04/The-Role-of-Tribal-Education-Departments.pdf> .
- McCoy, M.L. (2005). *Indian education legal support project: Compilation of state Indian education laws*. Boulder, CO: Native American Rights Fund. Retrieved from <http://www.narf.org/pubs/edu/blue.pdf>.
- National Congress of American Indians & National Indian Education Association. (2010). *National tribal priorities for Indian Education*. Washington, DC: Author. Retrieved from: [http://www.niea.org/data/files/policy/ncai\\_niea\\_joint\\_priorities\\_revised\\_13july2010.pdf](http://www.niea.org/data/files/policy/ncai_niea_joint_priorities_revised_13july2010.pdf) .
- National Indian Education Association. (2010). *Native education 101: Basic facts about American Indian, Alaska Native, and Native Hawaiian education*. Washington, DC: National Education Association, Minority Community Outreach. Retrieved from <http://www.niea.org/data/files/policy/nativeeducation101.pdf>.
- National Indian Education Association. (2012). *Legislative agenda: Advocacy briefing*. Washington, DC: Author. Retrieved from <http://niea.org/data/images/2012NIEABriefingBook.pdf>.
- Tippeconnic, J.W., III. (2000). Reflecting on the past: Some important aspects of Indian Education to consider as we look toward the future. *Journal of American Indian Education*, 39(2), 39-48.

## **Section L. When Disaster Strikes: What State Coordinators Need to Know and Do**

### **L.1 The Challenges**

When disaster strikes a community, the profound impact on all of its citizens can be overwhelming and can create an urgent need for a variety of comprehensive support systems to spring into action. Relief agencies are typically focused on providing the emergency assistance needed to manage the immediate trauma, including food, clothing, shelter, and safety. In the wake of a disaster, relief agencies do not always recognize the benefits of the school setting for children of displaced families as a top priority, yet it is often the school that provides safety and stability.

Unfortunately, the challenges that schools face in their efforts to provide the much-needed safety and stability are numerous, often driven by circumstances outside of the control of school district personnel to address or alleviate. In many cases, local education agencies (LEAs) receiving large numbers of displaced students due to disaster do not have the capacity to identify, enroll, and serve eligible students. Physical damage to infrastructure may have destroyed internal technology capacity to access needed data. School transportation departments may be unprepared for large numbers of displaced children and youth. Families already identified as homeless may have moved to temporary housing outside of the school district, or roads may be obstructed such that transportation to school of origin may no longer be possible. In some cases, schools may be destroyed, or damaged to the degree that infrastructure cannot support a normal school experience. It is possible that LEA and/or school staff members may have experienced their own trauma or losses, leading to reduced human supports in the school setting.

During disaster, and in its immediate aftermath, displaced families may experience any number of difficulties, including serious injuries, loss of loved ones and loss of belongings, anxiety, and fear of separation. They may be traumatized by the event to the extent that they do not recognize the potential safety and stability that schools may be able to provide. Many displaced families may have never considered that they could become homeless and may be unaware of the McKinney-Vento Act and the services available to them. Families may not

realize that they fit the McKinney-Vento definition. Furthermore, some scenarios of temporary housing are complex; eligibility determinations may become difficult as families sometimes stay in hotels while their homes are being rebuilt. LEAs may resist providing services for an extended time period after the disaster even though families are still in temporary housing.

Another set of challenges relates to the pressing need for immediate collaboration and coordinated community activity during a disaster. Relationships with community-based relief agencies may not be strong enough to support the sharing of needed information. Even in school districts with active interagency networks, a disaster can interrupt or even completely disable the communication infrastructure needed for the sharing of critical information and the coordination of response activity. A most basic barrier may be the lack of reciprocal knowledge and understanding of agency roles, responsibilities, and services/resources provided. LEAs may not be familiar with emergency management agencies (EMAs) and resources they provide; EMA staff may not be familiar with McKinney-Vento rights. Unfortunately, a lack of mutual knowledge between LEAs and the Federal Emergency Management Agency (FEMA) and other relief agency resources may limit swift and effective communication between schools and relief agency staff. Additionally, EMAs may not prioritize educational continuity, and/or they may not be able to meet with homeless education staff while addressing basic needs during and immediately after a disaster.

Additional challenges may result from ongoing capacity issues unrelated to a disaster. For example, the local homeless education liaison (referred to subsequently as the *local liaison*) may be new to the position and lack a full understanding of McKinney-Vento requirements, or the local liaison may have insufficient time assigned to McKinney-Vento responsibilities, limiting time available for effective collaboration with community partners and relief agency staff. In some cases, LEA administrators may not have adequate knowledge or understanding of McKinney-Vento, which may result in confusion about what services/supports are allowed and what is required by the McKinney-Vento Act.

## **L.2 The Goals**

Developed by a work group of State Coordinators with first-hand experience, this document is offered to provide State Coordinators with information and resources to engage in developing a statewide disaster response plan specific to educational continuity for children and youth displaced by disasters, and to support local liaisons in collaborative planning for effective response to the educational needs of children and youth in their school communities when disaster strikes. In order to optimize services and support, State Coordinators are encouraged to develop a comprehensive plan, along with specific tools and processes, to guide local liaisons and other stakeholders in each community in addressing the educational needs of students displaced by disaster. The plan should be developed collaboratively with representatives from key role groups, including other state educational agency (SEA) programs (e.g., student services, school health, and school transportation), state agencies, local liaisons, school principals, and district administrators, as well as community-based agencies that serve homeless families. The planning process should also include representatives from disaster relief agencies that are active in the community and/or state.

With a view toward continuity in the education of students impacted by disaster, the following goals are suggested for use in the development of an effective disaster response plan:

**Goal 1** - Children and youth made homeless by disaster are able to return as soon as possible to the normalcy afforded by stable schooling.

- A. Families and youth made homeless by disaster are made aware of and understand their educational rights.
- B. Local school districts are prepared to address both the academic and the trauma needs of children and youth impacted by disaster.

**Goal 2** - Local school districts are prepared to collaborate with other agencies to implement McKinney-Vento Act rights and services for children and youth impacted by disasters.

- A. Local liaisons have the information and resources they need to ensure appropriate connections and linkages with key agencies in support of educational stability for children and youth made homeless by disaster.
- B. School districts are prepared to play a role in linking families and youth made homeless by disaster with community services.
- C. Emergency management agencies support educational continuity for children and youth made homeless due to disaster.

**Goal 3** - State agencies, SEAs, and LEAs have mechanisms in place to share appropriate data so that children and youth made homeless by disaster are appropriately coded, counted, and provided with immediate supports.

**Goal 4** - Legislators, granting agencies, and other funders understand the need to provide financial support for the educational needs of children and youth made homeless by disaster.

State Coordinators are urged to use these goals in discussions with key stakeholders and partners toward the development of a comprehensive statewide approach to enabling local communities to plan for continuity in the education of students impacted by disaster. Appendix L.1 Goals and Strategies for State-Level Support for McKinney-Vento Services for Students Displaced by Disasters provides a detailed description of potential challenges relative to each of the preceding four goals, along with suggested strategies, activities, and good practices for consideration during the planning process. It should be noted that strong collaboration between school personnel and relief agency staff is imperative to ensure that the educational needs of displaced children and youth are considered essential in planning for disaster relief, and in assessing needs in the immediate aftermath of disaster.

Potential solutions to the challenges discussed earlier lie in effective and timely communication, cross-agency reciprocal education efforts, and collaborative efforts to develop a solid plan for disaster response. A comprehensive statewide plan can provide the framework for local community plans, in which McKinney-Vento experts play an active role.

### L.3 Recommendations

In reference to the goals and potential challenges discussed above, the following recommendations are offered here to guide discussion and advance planning as State Coordinators work to prepare for a disaster in their school communities. Please note that these recommendations are in addition to, and in support of, the Strategies/Activities/Good Practices section of Appendix L.1 Goals and Strategies for State Level Support for McKinney-Vento Services for Students Displaced by Disasters.

1. Be prepared to provide quick training, critical information, and support to key role groups.
  - Establish a work group of local liaisons to engage in local planning; develop guidance and tools for distribution to all liaisons so that all LEAs are prepared in the event disaster strikes.
  - Ensure that schools are following the provisions of the McKinney-Vento Act by reminding the local liaisons to work with schools regarding the enrollment of students made homeless due to disaster.
  - Explore ways that McKinney-Vento state level activity funds may be provided to LEAs to enroll and serve children and youth made homeless by a disaster.
  - Ensure students made homeless by disaster are coded in database systems as McKinney-Vento eligible and flagged as displaced by disaster.
  - Centralize communication, making sure that all key organizations are part of the communication plan.
  - Recruit and train volunteers to assist with enrolling large numbers of displaced students.
  - Use Appendix L.1 of this document to guide discussions with key role groups.
  - Bookmark the [disaster page](#) of the NCHE website for quick access to sample tools, documents, and other materials to support planning for disaster response.
  - Include the topic of disaster planning as part of all liaison training events.
  - Include information for parents in district's parent handbook to let them know of resources available to them in the event of disaster.

2. Build an interagency network for the purposes of sharing information and resources in planning for collaborative response to disaster.
  - The State Coordinator should be part of the advance planning team at the state level. If not already connected, reach out to leaders in statewide relief agencies to build important relationships.
  - Connect with the Red Cross, the Federal Emergency Management Agency (FEMA), Salvation Army, National Voluntary Organizations Active in Disaster (VOAD), and other disaster relief agencies with state and local presence.
  - Identify available mental health resources and provide liaisons with lists of agencies and contacts.
  - Identify and communicate with other state-level educational program partners (e.g., student services, school health, school transportation, etc.) and other state agencies; make sure they are aware of the McKinney-Vento Act, the supports that are available in schools, and the importance of school stability for students made homeless by disaster.
  - Ask other state leaders whether a disaster task force with focus on children has been developed. If so, join the task force; if not, begin discussions with others about establishing one.
  - Ensure that a communication protocol or system is in place so that in the event of a disaster, state leaders can quickly and collaboratively determine the scope of the problem, such as number of families impacted, number of schools destroyed, infrastructure damage, and facilities needed for temporary relocation.
  - Network with State Coordinators in states impacted by disasters to learn about their preparations, procedures, and lessons learned.
  - Identify/establish a webpage for purposes of immediate communications among key individuals, groups, agencies, organizations; update website daily.
  - Develop an interactive map with hot links to available resources as part of disaster website.

## **L.4 Examples of Best and Promising Practices**

State, local, and national groups have developed a variety of strategies in response to disaster and its aftermath. A critical element common to the strategies and best practices most often cited is that of effective communication and collaborative planning. The development and maintenance of community partnerships are at the core of any effective response to disaster in a school community. It should be noted that one of the most important elements of strong disaster response is the existence of a robust McKinney-Vento program of services and supports already in place prior to the onset of disaster. In the end, strong and effective McKinney-Vento programs are much better able to respond to disaster than are local programs that find themselves without McKinney-Vento supports already in place.

### **L.4.1 State Examples**

McKinney-Vento State Coordinators in a number of states have experienced the devastating effects of natural disasters, including hurricanes, tornadoes, floods, and fires. Examples of planning tools and other materials are described here to showcase promising practices and lessons learned through working collaboratively at all levels to provide supports for students made homeless by disaster. The examples described here, and others, are available for review and downloading from the [NCHE disaster webpage](#).

The Florida Department of Education (FLDOE) has a number of practices in places for implementation when disasters strike. Given the frequency of hurricanes and other disasters in the area, the FLDOE is often challenged to respond quickly and effectively to the immediate needs of school-aged children and youth made homeless by disaster. The McKinney-Vento State Coordinator at FLDOE has collected a variety of materials specifically related to the full implementation of the McKinney-Vento Act in times of disaster for inclusion in this document. The FLDOE disaster resources, available on the NCHE disaster webpage, contain samples of essential communications between and among key role groups, including

- Sample emails to local liaisons with information about disaster-related data elements needed for accurate coding of homeless students and other items related to McKinney-Vento requirements;

- Timeline and agenda for conference calls;
- The FLDOE Disaster Phone Contact Tree, designating FLDOE phone contacts for all school districts, community colleges, and universities as part of its role in providing outreach and assistance to them during hurricane disasters;
- Sample letters from FLDOE leadership to district school superintendents pertaining to enrollment of students affected by disasters, testing, etc.;
- Directives to LEAs regarding enrollment in private schools;
- Disaster-related press releases and news updates; and
- A letter to U.S. Department of Education (USED) Secretary Arne Duncan requesting waivers.

Links to other organizations for information, referral, technical assistance, and potential collaboration are included in the FLDOE disaster resources. Of special note is the [K-20 Summary of Hurricane Recovery Efforts: The Department's Role in Emergency Management and Recovery Efforts](#), a one-page bulleted list of Response Team activities.

In response to flooding in Colorado in 2013, the Colorado Department of Education (CDE) implemented many of the activities listed above, resulting in the development of valuable tools and processes to address the immediate needs of children and youth impacted by natural disaster. The State Coordinator took the lead in developing a variety of communications, guidance documents and other tools and processes to strengthen CDE's response to disaster.

A one-page memorandum, [McKinney-Vento Homeless Assistance Act Expediting Identification for Displaced Students](#), provided suggestions for quick and effective identification of McKinney-Vento students. Suggestions included training front-line staff members at schools who can become "initial identifiers" to help families with completing the necessary forms and expedite the process of identification. Initial identifiers used the [McKinney-Vento Identification Template](#) to expedite the process. The development of a CDE regional leadership team, in strong collaboration with the McKinney-Vento program, provided support for connecting families and students with much-needed resources. Two PowerPoint presentations, [Serving Displaced and Homeless Students Under Title IA](#) and [Transportation Collaboration Efforts on the Colorado Flood 2013](#), may be of particular interest to State Coordinators interested in the inclusion of Title IA program support in the advance planning phase of disaster response. CDE

developed a set of flood resources, including a McKinney-Vento Q&A. CDE distributed these resources to key stakeholders at SEA and LEA levels, clarifying what services and supports are available through schools. A one-page document, [\*McKinney-Vento Homeless Assistance Act: Expediting Identification for Displaced Students\*](#), offers critical information in a concise format and suggests a number of ideas for quick and effective identification of McKinney-Vento students. CDE developed a Disaster Distress Helpline and a dedicated webpage providing information on educational resources and state agency links. As in Florida, a collaborative approach to advance training for key role groups in disaster response was an essential part of the statewide plan in Colorado. Sample communications from the State Coordinator to local liaisons, superintendents, community agency staff and other key stakeholders are available for review on the NCHE disaster webpage.

#### **L.4.2 Examples of Local Efforts**

A sampling of efforts by local school districts to ensure the continuity of education for children and youth made homeless by disaster includes a guide developed by the Wisconsin Madison Metropolitan School District (MMSD). This document, [\*A Madison Metropolitan School District: Guide on Enrollment and Service Provision for Students Displaced by Hurricane Katrina\*](#), details plans for MMSD response to the needs of displaced students who might seek to attend school in this district after Hurricane Katrina. The guide, posted on the NCHE disaster webpage, covers issues such as immediate enrollment, free and reduced lunch, and post-trauma intervention services. Also included is guidance specific to special education, English as a Second Language (ESL), and bilingual education students.

Frequent tornadoes in Kansas have required local homeless liaisons and other program administrators to think creatively in addressing the educational needs of students impacted by disaster. With support from the State Coordinator, many districts assign a new local liaison to address the needs of students displaced by the disaster. For example, when one small town suffered from a tornado, but the rest of the district did not, the district assigned homeless liaison duties to the principal in that small town. The district made this decision because the

principal was in a better position to know about the displaced families and their needs than district level staff.

Following the occurrence of three tornadoes in rapid succession in Greensburg, Kansas, in 2007, over 95% of the students became homeless. District administrators were able to get permission from the state to end the school year officially at the time of the tornado. Similarly, other districts were able to grant certain students who they could not reasonably transport the option to end the school year at the time the disaster struck, if the family and school agreed.

In the preparation for a disaster, Kansas LEAs are encouraged to establish a small group at the district level to receive and disseminate all state level communications. This ensures consistency in all outgoing communications to all involved, including the local liaison, any temporary liaisons designated because of disaster, the food and nutrition director, the transportation director, the federal programs director, the superintendent, etc. Relief agencies are encouraged to refer questions regarding education to the local liaison to ensure accuracy of information.

#### **L.4.3 Federal information and resources**

When disaster strikes a community, whether a natural or man-made event, a series of responses take place through coordinated efforts of local, state, and federal government agencies. These emergency responses include implementation of established procedures relative to communication protocols, organizational structures, terminology, and key resources to engage appropriate agencies in effective response at all levels of government. The Stafford Act (section 401) requires that all requests for a declaration by the President that a major disaster has occurred must be made by the Governor of the affected State. This request from the Governor is made through the regional FEMA office, and is followed by a preliminary damage assessment (PDA) conducted by state and federal officials. Once a declaration has been made that a major disaster or emergency exists, an array of federal programs may be activated to assist in state and local response and recovery efforts. FEMA maintains a webpage with a listing of federally declared disasters [here](#).

State Coordinators are encouraged to be attuned to the process of declaration of disaster, and in the unfortunate event of major disaster, be poised to communicate with the appropriate state lead agency/department for disasters, typically the EMA, or the Police/Homeland Security Department. Once FEMA and the State sign the FEMA-State agreement, it is the state's lead emergency agency that administers the process and schedules the Applicants' Briefing. It is also recommended that McKinney-Vento State Coordinators connect with their public health emergency managers and human services departments for planning purposes. Further information can be found in [FEMA's Guide to the Disaster Declaration Process and Federal Disaster Assistance](#), which also includes contact information for FEMA's ten regional offices. A critical concern for emergency planning, support for the nutritional needs of homeless children post-disaster, is provided by USDA's Food and Nutrition Service (FNS). Go to the [USDA's Food and Nutrition Disaster Assistance webpage](#) for additional information to support planning for emergency response. State Coordinators are also encouraged to use the closest Disaster Recovery Center (DRC) as a location through which to disseminate information and to connect with displaced families. This is also the source from which many impacted individuals can learn about assistance from FEMA Individual Assistance. Locations for FEMA's DRCs can be found [here](#).

Federal response to several disasters, including Hurricanes Katrina, Rita, and Sandy, has included a series of efforts announced by the U.S. Department of Education to assist state and local governments in addressing the needs of children and youth made homeless by these disastrous events. For example, in the aftermath of several hurricanes occurring along the Gulf Coast, the [Homeless Education Disaster Assistance program](#) (HEDA) was established in 2008 to provide financial assistance to local educational agencies (LEAs) whose enrollment of homeless students increased as a result of the natural disaster. HEDA funds supported activities that addressed the educational and related needs of homeless students consistent with the requirements of section 723(d) of the McKinney-Vento Homeless Assistance Act. The [Aid to Institutions of Higher Education program](#) (HERA) provided assistance to students who attended institutions of higher education located in areas affected by Hurricane Katrina and Hurricane Rita in 2006. The program also provided emergency assistance to institutions that were

damaged and assistance to institutions to help them defray the cost of enrolling displaced students from schools at which operations were disrupted by the hurricanes. Federal efforts in response to disaster also include guidance, waivers and modifications of statutory requirements to other programs, such as the Federal Student Financial Aid Program. State Coordinators are urged to remain alert to any guidance from the U.S. Department of Education in the event of disaster declaration, to be apprised of any changes in regulations as the federal government reviews legislation, policies, rules and regulations, and whether waivers for such requirements may be an option.

Interagency collaboration has been the hallmark of several efforts for disaster response at the federal level. The Children’s Working Group (CWG) was established in 2009 to provide leadership in FEMA efforts to form partnerships with federal and non-governmental agencies to ensure that the needs of children are integrated into all disaster planning, preparedness, response and recovery efforts initiated at the federal level. Key focus areas of the CWG include

- Supporting state and local efforts in evacuation, tracking, and reunification of families;
- Addressing the needs of children with disabilities during disasters;
- Support for case management and crisis counseling for children and families through the U.S. Department of Health and Human Services;
- Increasing public awareness efforts to education youth and families about emergency preparedness;
- Restoration and reimbursement of child care facilities;
- Integrating needs of children into planning and sheltering guidance, emergency management grants, and overall emergency planning; and
- Improving coordination across the federal government and with state, local, tribal and territorial partners in support of children’s disaster related needs.

The federal Administration for Children and Families (ACF) Office of Human Services Emergency Preparedness and Response (OHSEPR), as part of Health and Human Services (HHS), developed a model, [\*Children and Youth Task Force in Disasters\*](#), to support state and local partners in building capacity to respond effectively to various types of disasters that may strike

a community. The model is based on lessons learned from four case studies following devastating natural disasters: The Joplin Child Care Task Force, The Hurricane Isaac Children’s Needs Task Force, The Superstorm Sandy New Jersey State-led Task Force, and The Superstorm Sandy New York Children’s Task Force. Based on these four examples, the model offers guidelines for the development of a state-driven process to assist state and local planners in creating a community task force that they can tailor to individual communities and to specific disasters. The model offers recommendations for states and local communities interested in launching their own task forces in efforts to coordinate an effective planning process for addressing the needs of children and youth during emergency preparedness, response and recovery, including starting in the preparedness phase to forge partnerships with local, state, and federal agencies prior to disaster striking the community. Strong partnerships require that the aforementioned agencies work together to share a common assessment of community needs and to develop an integrated strategy to address those needs.

The model offers a comprehensive list of potential partners, representing federal, state, and local agencies. The deliberate and strategic inclusion of school personnel who understand McKinney-Vento would certainly optimize outcomes for children and youth impacted by disaster.

The Office of Safe and Healthy Students (OSHS) in the U.S. Department of Education’s Office of Elementary and Secondary Education (OESE) developed a model *School Emergency Management Plan*, framed by four phases: Prevention-Mitigation, Preparedness, Response, and Recovery. Key elements for each phase are as follows:

- Prevention-Mitigation: Implement (1) prevention actions, which decrease the likelihood that an event or crisis will occur, and (2) mitigation actions, which eliminate or reduce the loss of life or property damage for events that cannot be prevented (e.g., natural disasters).
- Preparedness: Coordinate with community partners on (1) developing emergency plans, policies, and protocols; (2) adopting the National Incident Management System (NIMS) and the Incident Command System (ICS); and (3) training and exercising and revising the plan.

- Response: Implement the following steps: (1) activate the plan and the ICS, 2) activate the communication plans, (3) deploy resources, and (4) account for students and staff, and (5) activate family reunification.
- Recovery: To assist students, staff members, and their families in the healing process and to restore operations in schools, implement activities for (1) physical/structural recovery, (2) business/fiscal recovery, (3) academic recovery, and (4) psychological/emotional recovery.

The planning process involves the establishment of a team to determine goals and objectives based on the unique characteristics of the school community and the type of disaster. The six steps governing the process are:

- Form a collaborative planning team,
- Understand the situation,
- Determine goals and objectives,
- Develop a plan (identify courses of action),
- Prepare, review, and approve the plan, and
- Maintain plan implementation.

The [Readiness for Emergency Management for Schools \(REMS\) Technical Assistance Center](#) sponsored by OESE provides further information about school emergency management through publications, webinars, training, and other resources. State Coordinators are urged to support local liaisons in building the relationships with local emergency management staff needed to increase their knowledge of the McKinney-Vento Act and their understanding of the importance of educational stability in helping them to meet their goals.

For more information on good practices, and available resources, see Appendix L.2 – Annotated List of Available Resources for State Coordinators and Local Liaisons. State Coordinators are encouraged to review these materials, along with sample documents and other tools on the NCHE website.

## L.5 Conclusion

Disasters are unpredictable and devastating, each with its own unique challenges and impacts on children, youth, and families. The question is not *if* a disaster will occur in a community, but *when* will a disaster occur. States, communities must be prepared to respond quickly and efficiently. Schools serve a critical role in ensuring safety, routine, and healing from trauma for children and youth who have been displaced by a disaster. State- and local-level McKinney-Vento programs are instrumental in identifying impacted children and youth and reconnecting them to school as quickly as possible.

To facilitate this quick response, State Coordinators should incorporate disaster preparedness in their work plans by

- Familiarizing themselves with all provisions of the McKinney-Vento Act to ensure that the requirements for implementation can be communicated clearly in disaster situations (particularly in regard to determining eligibility for McKinney-Vento services, school selection, and transportation),
- Familiarizing themselves with federal disaster resources and processes,
- Joining state emergency management and disaster response teams,
- Developing a process for using McKinney-Vento state-level activity funds to support the educational needs of children and youth displaced by disasters, and
- Including disaster preparedness in their liaison trainings.

By taking these preliminary steps, State Coordinators and local liaisons will be well-positioned to be proactive and efficient in the event that a disaster occurs.

Finally, it must be noted that disaster recovery can be an extensive and long-term process. Indeed, disaster-impacted children may need support specific to the disaster well into the following school year. For example, many school children in New Jersey were unable to return to their original school districts for more than a year following Hurricane Sandy. Thus, the issue of transporting children across district lines for many months, and possibly into the next school year, could likely be an issue that school districts should prepare for in advance.

**Appendix L-1. Goals and Strategies for State-Level Support for McKinney-Vento Services for Students Displaced by Disasters**

<p><b>Goal 1:</b> Children and youth made homeless by disaster are able to return as soon as possible to the normalcy afforded by stable schooling.</p> <p>a. Families and youth made homeless by disaster are made aware of and understand their educational rights.</p> <p>b. Local school districts are prepared to address both the academic and the trauma needs of children impacted by disaster.</p>	
Challenges	Strategies/Activities/Good Practices
<ul style="list-style-type: none"> <li>• Families may move to temporary housing outside of the school district.</li> <li>• Families may not realize they fit the McKinney-Vento (MV) definition; families and youth may have never expected to be homeless and are unfamiliar with the law.</li> <li>• Information on rights and services may be unavailable during times of disaster due to limited communication or damaged communication infrastructure.</li> <li>• LEAs may not be in contact with homeless families and youth during or after a disaster.</li> <li>• LEA administrators may not understand how MV applies to families displaced by disaster.</li> <li>• Schools may be damaged or destroyed.</li> <li>• LEAs receiving large numbers of displaced students may not have the capacity to identify, enroll, and serve eligible students; instructional resources may be insufficient to meet needs of high numbers of homeless students enrolled from disaster impacted area.</li> <li>• LEAs may resist providing services for an extended time period after the disaster even though families are still in temporary housing; some scenarios of temporary housing are grey and complex for eligibility determination due to types of support a displaced family may receive.</li> <li>• Families, children, youth may be traumatized; children may experience fear and/or separation anxiety.</li> <li>• Other needs may take precedence over schooling.</li> <li>• Staff may not be equipped to assess trauma needs of children and youth; trauma staff may be spread thin in the area where disaster has occurred.</li> </ul>	<p><u>Before:</u></p> <ul style="list-style-type: none"> <li>• Establish a liaison disaster work group to develop a plan for disaster response; disseminate the plan to all LEAs.</li> <li>• Develop sample tools to facilitate the implementation of the disaster plan, including guidance documents, sample memoranda, checklists, tip sheets, and a list for all community emergency contacts.</li> <li>• Include disaster response in all liaison trainings (e.g., eligibility scenarios that address families displaced by disaster).</li> <li>• Encourage the development of a small work group at the district level to receive all state level communication and provide consistent outgoing information to all program representatives involved.</li> <li>• Develop a disaster web page and include the link in parent handbooks so that parents will know that this will be a centralized information portal after a disaster when electricity and Internet capability are restored.</li> <li>• Identify state emergency resources and ensure they are aware of the McKinney-Vento program; identify local affiliates and provide this information to local liaisons so that they may participate in disaster planning activities and ensure that services to help children and youth return to school expeditiously are part of the plan.</li> </ul> <p><u>During:</u></p> <ul style="list-style-type: none"> <li>• If communication is possible, provide short, targeted information to key role groups regarding rights and services for students displaced by disasters.</li> <li>• Communicate with other state leaders to figure out the scope of the problem, where and how many school districts are impacted, and where evacuees are likely to find safe haven.</li> <li>• Update the disaster web page on a continual basis.</li> <li>• Engage additional staff or volunteers to assist with enrolling large numbers of displaced students and linking them to community resources.</li> <li>• Ensure that schools use the disaster code when enrolling displaced</li> </ul>

**Goal 1:** Children and youth made homeless by disaster are able to return as soon as possible to the normalcy afforded by stable schooling.

a. Families and youth made homeless by disaster are made aware of and understand their educational rights.

b. Local school districts are prepared to address both the academic and the trauma needs of children impacted by disaster.

Challenges	Strategies/Activities/Good Practices
	<p>students.</p> <ul style="list-style-type: none"> <li>• Communicate with state-level administrators to ensure that transportation and food services can be expedited at the locations where displaced children and youth enroll.</li> <li>• Contact counselors and external agencies to be prepared to provide trauma-informed care to children, youth, and families.</li> <li>• Review budget for state-level activities to determine what funds can be provided to support the enrollment and continuous education for displaced students in impacted LEAs.</li> </ul> <p><u>After:</u></p> <ul style="list-style-type: none"> <li>• Provide periodic updates to all LEAs that enrolled displaced students reminding them that there is no time limit on homelessness and offer assistance to help them review eligibility of students on a case-by-case basis.</li> <li>• Provide information and resources to local liaisons for ongoing support for the educational needs of students displaced by disasters.</li> <li>• Collect data on students displaced by the disaster to provide to governmental agencies or other possible funders.</li> <li>• Update the disaster web page with information and resources for parents.</li> <li>• Convene a work group of liaisons, educators, administrators, and service providers to review what went well related to meeting the educational need of displaced students and what policies and practices need to be implemented in the event of a future disaster.</li> </ul>

**Goal 2:** Local school districts are prepared to collaborate with other agencies to implement McKinney-Vento Act rights and services for children and youth impacted by disasters.

a. Local homeless liaisons have the information and resources they need to ensure appropriate connections and linkages with key agencies in support of educational stability for children and youth made homeless by disaster.

b. School districts are prepared to play a role in linking families and youth made homeless by disaster with community services.

c. Emergency management agencies support educational continuity for children and youth made homeless due to disaster.

Challenges	Strategies/Activities/Good Practices
<ul style="list-style-type: none"> <li>• LEAs may not be familiar with the local service providers, including emergency management agencies, and the resources they provide.</li> </ul>	<p><u>Before:</u></p> <ul style="list-style-type: none"> <li>• Identify and communicate with emergency management agencies at the</li> </ul>

**Goal 2:** Local school districts are prepared to collaborate with other agencies to implement McKinney-Vento Act rights and services for children and youth impacted by disasters.

- a. Local homeless liaisons have the information and resources they need to ensure appropriate connections and linkages with key agencies in support of educational stability for children and youth made homeless by disaster.
- b. School districts are prepared to play a role in linking families and youth made homeless by disaster with community services.
- c. Emergency management agencies support educational continuity for children and youth made homeless due to disaster.

Challenges	Strategies/Activities/Good Practices
<ul style="list-style-type: none"> <li>• Local service providers, including emergency management agencies, may not be familiar with McKinney-Vento rights and services.</li> <li>• Emergency management agencies may not prioritize educational continuity.</li> <li>• Emergency management agencies may be unable to meet with homeless education staff while addressing basic needs of victims.</li> </ul>	<p>state level to make sure they know about the McKinney-Vento Act and rights and resources made available to students made homeless by disaster.</p> <ul style="list-style-type: none"> <li>• Develop joint communications with state agencies regarding the McKinney-Vento Act, the supports that are available in schools, and the importance of stability in school for students made homeless by disaster, and request that they refer families with school-aged children impacted by disaster to the school district local homeless liaison. (Consider providing them NCHES's <a href="#">Connecting Schools and Displaced Students</a> handbooks.)</li> <li>• Determine if a statewide disaster preparation task force exists, and if so, ask to join or provide information to the group on a periodic basis.</li> <li>• Develop a resource manual for local liaisons for state-level resources during an emergency.</li> <li>• Include a recommendation in liaison trainings that local liaisons develop a resource manual for local resources for children, youth, and families made homeless by disaster; remind them to update the manual annually.</li> <li>• Encourage local liaisons to contact emergency preparedness task forces or planners in the school system and in the community to provide information on the homeless education program and the importance of school continuity in the wake of disaster, and to become part of the emergency preparedness planning process.</li> </ul> <p><u>During:</u></p> <ul style="list-style-type: none"> <li>• Work with state-level relief agencies to send short memos to local emergency service providers requesting that they refer impacted families with school-aged children the school district local liaison; provide contact information for the local liaison.</li> <li>• Contact local liaisons in impacted LEAs to ensure they have resource guides and contacts for making referrals to emergency services for children, youth, and families made homeless by disaster.</li> </ul> <p><u>After:</u></p>

**Goal 2:** Local school districts are prepared to collaborate with other agencies to implement McKinney-Vento Act rights and services for children and youth impacted by disasters.

- Local homeless liaisons have the information and resources they need to ensure appropriate connections and linkages with key agencies in support of educational stability for children and youth made homeless by disaster.
- School districts are prepared to play a role in linking families and youth made homeless by disaster with community services.
- Emergency management agencies support educational continuity for children and youth made homeless due to disaster.

Challenges	Strategies/Activities/Good Practices
	<ul style="list-style-type: none"> <li>Convene a meeting of liaisons to determine what went well and what lessons could be learned for future disaster events, specific to linking families to services.</li> <li>Meet with state-level emergency assistance providers to discuss what went well and what lessons could be learned for future disaster events, specific to linking families to services.</li> <li>Work with state agencies to jointly develop policies and protocols based on lessons learned and disseminate to LEAs and local agencies.</li> </ul>

**Goal 3:** State agencies, state educational agencies, and local educational agencies have mechanisms in place to share appropriate data so that children and youth made homeless by disaster are appropriately coded, counted, and provided with immediate supports.

Challenges	Strategies/Activities/Good Practices
<ul style="list-style-type: none"> <li>State or local database may not include appropriate data elements to ensure accurate data collection of students made homeless by disaster.</li> <li>Physical damage to infrastructure may have destroyed internal technology capacity to access needed data.</li> <li>Relationships with community based relief agencies may not be strong enough to support the sharing of needed information.</li> <li>School districts may not have adequately prioritized collecting data on the number of students displaced by disasters because they are focused on meeting the immediate needs of their students and staff.</li> <li>School district staff may be reluctant to share data on students impacted by the disaster due to their understanding of FERPA.</li> </ul>	<p><u>Before:</u></p> <ul style="list-style-type: none"> <li>Work with state data staff to establish a uniform disaster code for use when LEAs enroll students displaced by disaster.</li> <li>Review FERPA laws to determine what data can be shared.</li> <li>Provide a joint memorandum with state-level emergency relief agencies to local agencies and shelter providers and local liaisons to clarify FERPA laws; encourage the development of a Memorandum Of Understanding (MOU) between LEAs and local agencies before a disaster occurs.</li> </ul> <p><u>During:</u></p> <ul style="list-style-type: none"> <li>Send a memorandum to liaisons and enrollment staff to ensure that the residency and cause status of students made homeless by disaster is appropriately coded and tracked.</li> </ul> <p><u>After:</u></p> <ul style="list-style-type: none"> <li>Review data collection and coding process for students made homeless by disaster and improve as needed.</li> <li>Identify data-sharing challenges and develop policies and protocols to resolve; update disaster handbook as needed.</li> </ul>

**Goal 4:** Legislators, granting agencies, and other funders understand the need to provide financial support for the educational needs of children and youth made homeless by disaster.

Challenges	Strategies/Activities/Good Practices
<ul style="list-style-type: none"> <li>Legislators and funders may not be aware of the extraordinary needs and expenses for serving children and youth made homeless by disaster.</li> <li>Legislators and funders may not be aware of the importance of educational continuity and stability for homeless children and youth.</li> </ul>	<p><u>Before:</u></p> <ul style="list-style-type: none"> <li>Identify state and local philanthropic organizations that might be interested in providing support for children and youth made homeless by disaster; research their funding priorities and application process; develop a relationship and provide information packets on the importance of school continuity in times of crisis.</li> <li>Reinforce in liaison trainings the importance of keeping quality data on the numbers of children and youth made homeless by disaster and expenses incurred to meet their educational needs.</li> </ul> <p><u>During:</u></p> <ul style="list-style-type: none"> <li>Look for announcements of federal, state, or local funds directed to communities impacted by disaster; determine eligibility of LEAs to apply for funds to support the educational continuity of students and application process.</li> <li>Look for announcements of nonprofits and other funding agencies who will provide support for; determine eligibility of LEAs to apply for funds to support the educational continuity of impacted students and application process.</li> </ul> <p><u>After:</u></p> <ul style="list-style-type: none"> <li>Review needs identified in impacted school districts by local liaisons and apply for funds or assist local liaison with applying for funds, as appropriate.</li> <li>Review quality of data collected by LEAs on students made homeless by disaster and determine changes that need to be made to the data collection system.</li> <li>Develop a report for legislators and policy makers on the extent to which the educational needs of students made homeless by disaster were met and make recommendations for policy changes.</li> </ul>

## Appendix L-2. Annotated List of Available Resources for State Coordinators and Local Liaisons

### NCHE Resources

#### ***Connecting Schools and Displaced Students handbook series:***

This handbook series was published in 2006 following the challenges experienced in many states as families relocated throughout the nation following the Gulf Coast Hurricanes of 2005. The handbooks explain how the McKinney-Vento Homeless Assistance Act applies to students displaced by disaster and how the Act can assist these students and their families. Each handbook in the series targets information either to parents of displaced children, relief agencies, or educators. The series includes the following handbooks:

- [After the Storm: Information for Parents on How Schools Can Help After Disasters \(A Handbook for Parents\)](#)
- [Disaster Relief Agencies and Schools: Working Together to Ensure School Enrollment and Success \(A Handbook for Local Liaisons and State Coordinators\)](#)
- [From the School Office to the Classroom: Strategies for Enrolling and Supporting Students Experiencing Homelessness](#)
- [School as a Safety Net: Connecting Displaced Children With Educational and Support Services \(A Handbook for Relief Agency Staff and Volunteers\)](#)

The following brief highlight from one of the handbooks referenced above, *Disaster Relief Agencies and Schools: Working Together to Ensure School Enrollment and Success*, provides a concrete list of strategies for working successfully with relief agencies. Strategies are discussed, with tips provided for each, accompanied by a Checklist for Working Together:

- ✓ Communicate: Start building relationships with relief agencies now.
- ✓ Teach: Provide McKinney-Vento training and awareness materials to relief agency staff.
- ✓ Learn: Discuss with local relief agency staff how your program can complement and support theirs.
- ✓ Share: Make sure relief agencies know about doubled-up, unaccompanied and “hidden” homeless students.
- ✓ Strategize: Work with relief agencies to develop release forms so they can share information with you.
- ✓ Coordinate: Enlist a superintendent or school board member to help you gain access to local disaster planning committees.
- ✓ Cooperate: Discuss school enrollment procedures with relief agency staff.
- ✓ Plan for the future: Engage relief agencies in long-term planning.

This handbook, along with others in the series, will be of great value to local liaisons and other key community stakeholders as they come together to build a comprehensive proactive plan for keeping education in the equation before, during and after disaster strikes.

### ***Connecting Schools and Displaced Students* brief series:**

This series of briefs also addresses how the McKinney-Vento Homeless Assistance Act applies to students displaced by disaster and how the Act can assist these students and their families.

Each brief in the series targets information either to youth experiencing homelessness on their own, relief agencies, or school district administrators. The series includes the following briefs:

- [Meeting the Educational Needs of Students Displaced by Disasters: Youth on Their Own](#)
- [What Relief Agencies Should Know About the Educational Rights of Children Displaced by Disasters](#)
- [What School District Administrators Should Know About the Educational Rights of Children Displaced by Disasters](#)

### **[A McKinney-Vento Toolbox: Constructing a Robust and Rigorous Homeless Education Program, In Case of Disaster and Every Day](#)**

This toolbox is designed to help school districts implement the McKinney-Vento Act fully, so they can address the needs of children and youth experiencing homelessness on a daily basis and in times of disaster. The toolbox contains information and practical lessons learned and resources developed during the recovery process following the 2005 Gulf Coast hurricanes.

### **[In Their Own Words: Schools and Students Overcoming Adversity](#)**

This NCHE publication provides readers with a window into the daily challenges and triumphs of the schools and students affected by August 2005's Hurricane Katrina. *In Their Own Words*, in large part, is a first-person account of the hurricane's effects on education on the Gulf Coast during the few weeks and months after landfall and since. It is the voices of the students and the school, district, and relief agency staff who were closest to the challenges that resulted from the hurricane.

### **Other Publications/Guides/Documents**

#### **[A National Report Card on Protecting Children During Disasters](#)**

This July 2010 brief from Save the Children provides a state-by-state assessment on four measures of caring for children in the wake of a disaster: Does the state require licensed child care facilities to: 1) have a plan for evacuating kids in child care; 2) have a written plan to notify parents of an emergency and reunite them with their kids; and 3) have a written plan that accounts for kids with special needs; and 4) Does the state require all schools to have a disaster plan that accounts for multiple hazards?

#### **[A Practical Guide for Crisis Response in our Schools](#)**

This webpage includes links to all chapters of this valuable resource from the American Academy of Experts in Traumatic Stress. Relevant chapters include *Practical Suggestions for*

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State Coordinators' Handbook: When Disaster Strikes: What State Coordinators Need to Know and Do  
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*Assisting Children in the Aftermath of a Tragedy, Teacher Guidelines for Crisis Response, Parent Guidelines for Crisis Response, and Traumatic Stress: An Overview.*

### [After the Storm: A Guide to Help Children Cope With the Psychological Effects of a Hurricane](#)

This guide, published by 7-Dippity.com in the wake of the 2004 hurricane season that devastated Florida, provides information, activities, and coping strategies to help parents and children cope with their reactions and feelings resulting from a hurricane and its aftermath.

### [FERPA Policy Guidance: Disclosure of Student Information Related to Emergencies and Disasters](#)

This guidance from the U.S. Department of Education, issued in June 2010, answers questions about the sharing of personally identifiable information from students' education records to outside parties when responding to emergencies, including natural or man-made disasters.

### [Homeless Education Advocacy Manual: Disaster Edition](#)

This manual from the National Law Center on Homelessness and Poverty informs advocates and families concerned about the educational needs of children and youth displaced from their homes due to a disaster. It includes information about topics such as which students are considered homeless under federal law; methods of advocating for individual students; methods of advocating for system-wide change; securing immediate school enrollments; ensuring stable school placements; and accessing necessary and beneficial services such as transportation and academic assistance.

### [Madison Metropolitan School District: Guide on Enrollment and Service Provision for Students Displaced by Hurricane Katrina](#)

This guide from the Madison Metropolitan School District (MMSD) explains how MMSD will respond to the needs of students displaced by Hurricane Katrina that wish to attend school within the district. The guide covers issues such as immediate enrollment, free and reduced lunch, post-trauma intervention services, and more.

[The National Disaster Recovery Framework](#) is a guide from FEMA that enables effective recovery support to disaster-impacted States, Tribes, Territorial and local jurisdictions. It provides a flexible structure that enables disaster recovery managers to operate in a unified and collaborative manner. It also focuses on how best to restore, redevelop and revitalize the health, social, economic, natural and environmental fabric of the community and build a more resilient Nation.

### **Related Agencies/Websites**

#### [American Red Cross](#)

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State Coordinators' Handbook: When Disaster Strikes: What State Coordinators Need to Know and Do  
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This national organization with local chapters provides relief services to communities affected by disasters, including food, water, short-term shelter, counseling support, and assistance with family reunification.

[American School Counselors Association: Helping Children Cope with Natural Disasters](#)

This webpage provides tips for administrators, counselors, parents, and teachers, in helping children and youth cope with the devastation caused by a natural disaster.

[Center for Mental Health in Schools: Responding to a Crisis](#)

This website provides a variety of quick aids, resources, and materials for use in crisis prevention and response in schools.

[Coordinated Assistance Network \(CAN\)](#)

CAN is a network of seven charities that participate in community-led preparedness and response coalitions focusing on best practices to serve those in need. CAN partnered with FEMA to develop a web-based database to share information between agencies.

[Coping with Disasters](#)

This webpage from the National Association for the Education of Young Children (NAEYC) offers suggestions for how to help young children deal with witnessing or being directly affected by the destruction of a natural disaster.

[DisasterAssistance.gov: The Nation's First Stop for Disaster Relief](#)

This U.S. government website enables citizens to locate and apply for disaster relief.

[Fairfax County Public Schools: Emergency Preparedness and Support](#)

This webpage from Fairfax County Public Schools details the district's emergency preparedness and response plans, which have been cited by the U.S. Department of Education and the U.S. Department of Homeland Security as national models.

[Federal Emergency Management Association \(FEMA\)](#)

FEMA's website provides disaster victims with information on how to access a variety of support services, including government benefits, hotlines for finding loved ones, and more.

[National Association of School Psychologists: School Safety and Crisis Resources](#)

This website provides a variety of resources dealing with crisis prevention, planning, and response. It addresses a variety of emergency situations, including school violence and natural disasters.

[National Voluntary Organizations Active in Disaster \(NVOAD\)](#)

NVOAD is a membership organization of approximately 40 disaster response agencies that coordinates the planning efforts of those agencies and serves as an information clearinghouse. There are state and regional VOADs, although not in every state.

[Office of Safe and Healthy Students: Emergency Planning](#)

This webpage from the U.S. Department of Education's Office of Safe and Healthy Students is designed to be a one-stop shop that provides school leaders with information they need to plan for any emergency, including natural disasters, violent incidents and terrorist acts.

[Oregon School Boards Association \(OSBA\): Student Safety Center](#)

This webpage from the Oregon School Boards Association (OSBA) provides various checklists and resources related to emergency preparedness and response.

[Readiness and Emergency Management for Schools Technical Assistance Center](#)

The Readiness and Emergency Management for Schools (REMS) Technical Assistance (TA) Center supports grantees funded under the Readiness and Emergency Management for Schools (REMS) discretionary grant program by providing emergency management resources, training, and publications. The Center also helps non-grantee local educational agencies (LEAs) and private schools with improving and strengthening their emergency management plans through the provision of resources, responses to technical assistance requests, and facilitation of emergency management for schools training events.

[Salvation Army](#)

A Christian church, founded in 1865 to advance the Christian religion, promote education, relieve poverty, and pursue other charitable works. Employees and volunteers work with programs that focus on health, education, social services and emergency disaster relief.