

## **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

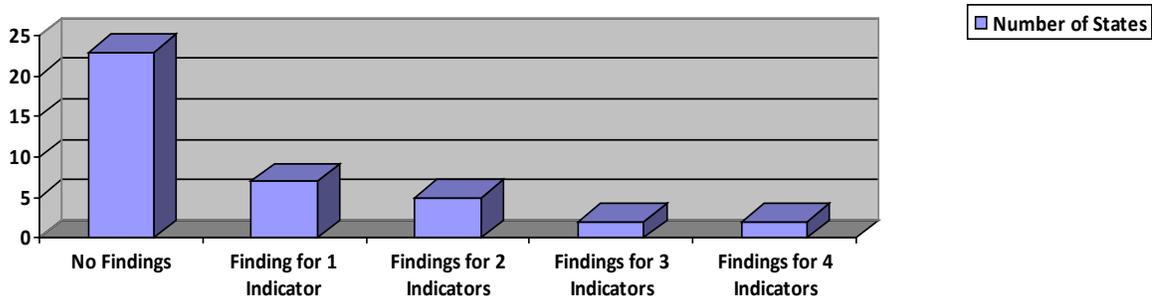
<b>Second Round Monitoring Result</b>	<b>Number of Findings/ Recommendations</b>	<b>Number of States (of 39 monitored) With at Least One Finding or Recommendation in Second Round</b>
Findings	31	15
Recommendations	29	18

### **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

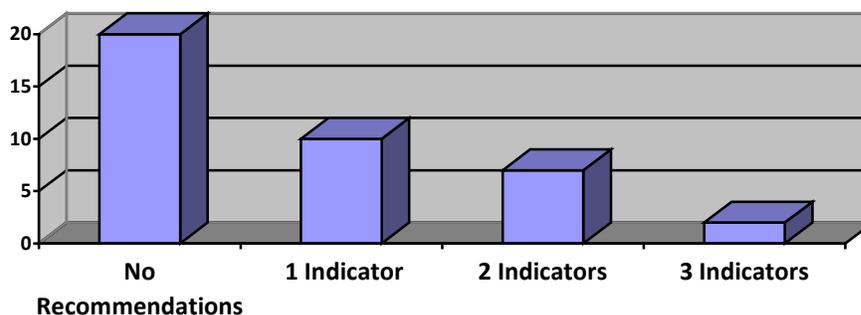


### Summary of Monitoring Recommendations

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.