

State Coordinators' Handbook

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

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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.

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