State Coordinator's Handbook
for LEA Monitoring

National Center for Homeless Education at SERVE

Prepared for the
National Center for Homeless Education
by
Beth Garriss Hardy, Ph.D
Fall 2006

State Coordinator's Handbook for LEA Monitoring

Purpose of This Handbook

This document is designed to assist State Coordinators for Homeless Education in the development and implementation of an effective monitoring process that includes all Local Educational Agencies (LEAs), those with and without McKinney-Vento subgrants. Based on the experiences of veteran State Coordinators and others with information to share about the monitoring process, this handbook discusses challenges and strategies related to monitoring LEAs for compliance with the legislative requirements of the McKinney-Vento Homeless Assistance Act. State Coordinators will also find sample tools for use in developing, adapting, and customizing their own monitoring process.

Acknowledgements

NCHE extends its appreciation to the following State Coordinators for Homeless Education for their review of drafts, sample tools, and other valuable contributions:

Dona Bolt, Oregon
Dr. Lynda Thistle-Elliott, New Hampshire
Barbara James, Texas
Mary Maronek, Wisconsin
Mary Marshall, Kentucky
Brenda Myers, South Carolina
Dr. Ray Morley, Iowa
Dr. Patricia Popp, Virginia
Roger Reikofski, Nebraska
Dana Scott, Colorado
Leanne Wheeler, California

Editing/Design: Christina Dukes, NCHE

State Coordinator's Handbook
for LEA Monitoring

About NCHE

The National Center for Homeless Education (NCHE) is a national resource center for research, information, and technical assistance enabling communities to address successfully the needs of children and their families who are experiencing homelessness and unaccompanied youth in homeless situations. Funded by the U.S. Department of Education, NCHE provides services to improve educational opportunities and outcomes for homeless children and youth in our nation's school communities. NCHE is housed at the SERVE Center at the University of North Carolina at Greensboro.

National Center for Homeless Education
Toll-free HelpLine: 800-308-2145
http://www.serve.org/nche

Diana Bowman, Director
NCHE at SERVE
P.O. Box 5367
Greensboro, NC 27435
Phone: 336-315-7453 or 800-755-3277
E-mail: *dbowman@serve.org* or *homeless@serve.org*

About the Education for Homeless Children and Youths (EHCY) Program

The Education for Homeless Children and Youths (EHCY) Program, funded under Title X, Part C, of the No Child Left Behind Act, ensures equal access to a free, appropriate public education for children and youth experiencing homelessness. For more information about this federal program, contact:

U.S. Department of Education
Student Achievement and School Accountability Programs (SASA)
Office of the Elementary and Secondary Education Act (ESE)
Phone: 202-260-0826
http://www.ed.gov/programs/homeless/index.html

This document was produced by the National Center for Homeless Education under U.S. Department of Education contract ED-04-CO-0056-0001.

Effective Monitoring for ALL LEAs

The McKinney-Vento Homeless Assistance Act, reauthorized as Title X, Part C, of the No Child Left Behind Act, requires that State Educational Agencies (SEAs) conduct monitoring of Local Educational Agencies (LEAs) with and without subgrants; this monitoring must be sufficient to ensure compliance with McKinney-Vento program requirements *[Section 722(g)(2)(A) and (B)]*. While the monitoring process for LEAs with McKinney-Vento subgrants may include additional elements to evaluate the effectiveness of funded programs, SEA monitoring of LEAs for compliance with the McKinney-Vento Act should be comparable for LEAs with and without subgrants. Compliance monitoring not only ensures that LEAs meet their legal responsibilities; an effective monitoring process also can serve to strengthen the quality of programs serving homeless children and youth in all communities. Information gathered during the monitoring process provides evidence of quality implementation and, perhaps equally important, can inform decisions about the kinds of technical assistance that would best serve the school community on behalf of children and families in homeless situations. An effective monitoring process also allows State Coordinators to seek out and identify local practices and procedures that can be shared with others as promising solutions to LEAs whose programs are in various stages of development and implementation. Lastly, an effective monitoring process will convey to LEAs the importance of developing quality homeless education programs, not only for purposes of complying with legislation, but also for continuous improvement in services to homeless children and youth.

Feedback from several states with large geographic areas to cover, and/or large numbers of LEAs within the state, reports difficulty allocating sufficient staff time to conduct monitoring in all LEAs on an annual basis. Given the challenges of providing on-site monitoring for large numbers of LEAs, many states are developing a monitoring process that includes questions specific to McKinney-Vento compliance as part of their overall Title I monitoring protocol. In addition, many states utilize desk-monitoring strategies for unfunded LEAs while conducting on-site monitoring for LEAs with subgrants. Other states find it preferable to contract with a local university or other agency/individual to conduct monitoring activities. Ideally, SEA monitoring is a combination of on-site visits and desk monitoring such that the State Coordinator is able to determine the extent to which each LEA implements policy, programs, practices, and procedures that remove barriers for children and youth who are experiencing homelessness. Furthermore, the monitoring process should include follow-up reports, site visits, and additional examination as needed to ensure that any necessary corrective action is accomplished in a timely manner.

Critical Components of Effective Monitoring

Regardless of the specific practices used, whether on-site, desk monitoring, or some combination thereof, there are certain major elements to be considered in the development of the monitoring process:

- LEA's awareness and understanding of legislative requirements and of the role and responsibilities of local homeless education liaisons
- LEA's awareness of the *McKinney-Vento Data Standards and Indicators - 2006 Revisions* (available for downloading at *http://www.serve.org/nche/products.php*)

- Reference to the State Plan and Local Consolidated Plan, if available, to define parameters of state and local program requirements and related monitoring components; similar reference to the application for LEAs with McKinney-Vento subgrants
- Development of monitoring process/cycle/protocol/schedule
- Development/acquisition of tools needed to collect information and evidence of compliance
- Communication of information about monitoring schedule and process
- Plan for follow-up

One of the primary responsibilities of the State Coordinator is to confirm that key people in LEAs understand the specifics of the legislative requirements of the LEA regarding the education of children and youth in homeless situations (see Appendix A for State Coordinator responsibilities and Appendix B for LEA responsibilities). Additionally, the local homeless education liaison, a required position in all LEAs, must be fully knowledgeable of the specific responsibilities of the position. The *Local Homeless Education Liaison Toolkit* (*http://www.serve.org/nche/products.php*) provides a comprehensive overview of those responsibilities along with many sample tools to assist with the implementation of the program. The depth of understanding of roles and responsibilities will determine, in many cases, the adequacy of program implementation and the extent to which local programs are in compliance with legislation. (See Appendix B.)

When designing the overall monitoring plan, in large view, the State Coordinator will need to consider the particular challenges and opportunities that are specific to the state. Decisions will need to be made about who conducts the various monitoring activities, how and with what frequency, and what specific monitoring tools will be most appropriate.

The development, acquisition, or adaptation of appropriate and useful tools is a critical part of designing an effective monitoring process. Building a strong monitoring system begins with a set of questions that captures the program requirements and the LEA's implementation of programs that meet those requirements. State Coordinators will recall the questions from the protocol used by the U.S. Department of Education (ED) to conduct state monitoring; many of these questions can serve as a springboard for the development of questions for state monitoring of LEAs. Sample questions excerpted from the ED monitoring protocol are provided in Appendix C.

Additional sample questions are referenced in Appendix D, an annotated list of monitoring instruments contributed by State Coordinators who have developed and continued to strengthen their monitoring process and protocols. These tools are provided to demonstrate a variety of approaches to the organization, sequencing, and formatting of questions. These different approaches are offered to assist in the development of a customized monitoring protocol that best represents the unique needs of the State Coordinator making the selection. It is important to ensure that the questions selected represent the legislation and guidance, and are detailed enough to capture an accurate assessment of program implementation. It is also important to include questions related to record-keeping. For example, LEAs should be asked to provide written records of the tracking of barriers, such as a log of interactions between parents and local liaisons, or records of questions/ issues as they arise and what action was taken.

In the selection of questions for inclusion in the protocol, it is important to include not only general questions, but also an optional list of probe questions that capture specific examples of implementation. These probe questions often can illuminate an otherwise too general response, providing details of implementation that can differentiate a program that looks good on paper but might be less robust in reality. Optional probe questions will also be helpful to interviewers who are part of a larger monitoring team and may or may not be familiar with the various elements of local implementation of effective McKinney-Vento programs.

State Coordinators choosing to embed McKinney-Vento monitoring in the overall Title I monitoring process might wish to conduct follow-up monitoring by phone/fax/e-mail to probe further for indicators of compliance and program quality. State Coordinators can customize their list of questions to include both general and probe tiers in the way that is deemed most effective in securing evidence of compliance with the legislation.

In addition to the development of interview protocols, the use of a well-constructed survey instrument can be invaluable to the State Coordinator in gathering information to assess the quality of program implementation. Surveys can provide information on each of the critical elements of the legislation, and can be used to determine which topics require a phone call or other type of follow-up for further detail. For example, LEAs reporting unusually low numbers, or zero, of identified homeless children and youth, could be probed for further information about strategies in use, and by whom, in the outreach and identification process. Additionally, some State Coordinators find that conducting electronic surveys can be most expedient and productive in acquiring the information needed from LEAs. State Coordinators interested in developing online surveys can contact NCHE for assistance in the development of this convenient data collection tool.

Many State Coordinators have found that an LEA self-assessment is a highly desirable process, and especially useful as an initial phase of the monitoring process. Self-assessment can provide the basis for desk review and/or on-site monitoring. Examination of LEA self-assessments can also assist the State Coordinator in determining which LEAs would benefit from a site visit as opposed to desk monitoring. While the value of LEA self-assessment to the State Coordinator is considerable, the utility of such an instrument to the local liaison can be immeasurable. The use of a well-designed self-assessment tool can help keep program implementation on track, as well as identify areas of concern for LEAs seeking to strengthen specific program components they find in need of further development. Therefore the LEA self-assessment can serve a dual role, for local progress checks and as a component of the state's monitoring process. Several self-assessment tools targeting McKinney-Vento programs are included in Appendix D. In addition, the *McKinney-Vento Data Standards and Indicators - 2006 Revisions* (NCHE), a widely used tool for measuring progress in program implementation, is available for downloading at *http://www.serve.org/nche/products.php* for use in LEA self-assessment. This particular tool is considered by many to be the gold standard and is especially useful in the collection of hard data to guide the monitoring process.

On a final note, an effective monitoring system can be viewed as one component of a well-implemented McKinney-Vento program. While critical for accountability purposes, the overall monitoring process should also be viewed as an important piece of the program infrastructure, which is interwoven with professional development, program design, data collection, program evaluation, and communication/relationship building with all segments of the school/community.

Monitoring in Motion

The following scenarios describe four SEA approaches to the monitoring of LEAs for compliance with the McKinney-Vento Act. These scenarios feature a hybrid of a variety of components of monitoring programs currently in use, representing responses of State Coordinators to a questionnaire from NCHE in the summer of 2006.

Scenario 1 — Large state, in geographic area and population

Our state has established a comprehensive review process, with each LEA undergoing a full review every five years. As with other federally funded programs, questions specific to the legislative requirements of McKinney-Vento and related LEA responsibilities are included in the overall state monitoring process. I work closely with our Title I Director to develop questions that can be addressed by members of the review team, with probe questions noted if the interviewer needs clarification or if responses are not clear. These questions are revisited at the beginning of each year to reflect any changes in the legislation or in guidance from ED. Results of these site visits are forwarded to me as part of the after action reporting process, serving as a broad screening device for me to determine next steps for that LEA. Next steps could include any combination of (1) more in-depth monitoring, including a follow-up site visit by the State Coordinator, (2) follow-up monitoring via phone, fax, and/or e-mail, further exploring compliance issues or other items of interest, (3) technical assistance to address issues in program implementation, and/or (4) routine communication and exchange of information for support upon request.

A second and more important part of the broad screening process is the LEA self-assessment. Each LEA, including those with subgrants as well as those without, is required to complete a self-assessment that not only provides them with guidance and structure to judge their progress in implementation, but also gives me a snapshot of program status in that particular LEA. I use these self-assessment reports as another factor in determining monitoring and/or technical assistance needs in the LEAs.

Using these two measures, along with the LEA year-end report required of all local liaisons, I cluster the LEAs into the four groups mentioned above and begin prioritizing my schedule and activities. Those LEAs that need more in-depth monitoring are notified that a site visit will take place in the coming year. Other LEAs receive communications and requests for further information as determined by an analysis of the self-assessment, the year-end report, and other available information.

While the above process includes all LEAs, we do conduct additional on-site reviews of all LEAs receiving McKinney-Vento subgrants at least once during the grant period. These reviews cover all components of the funded program as well as the basic requirements of the McKinney-Vento Act. This on-site review, along with the year-end report, allows me to see first-hand how the program is being implemented, how the grant funds are being used, and what services are being supported with other resources. In particular, the review identifies the extent to which the homeless children and youth in the LEA are being served and provides a measure of the quality of those services.

Scenario 2 — Small state, few urban areas, many small LEAs

Our monitoring of LEAs is a combination of on-site reviews, desk reviews, telephone conferencing, and regional meetings. A significant first step in the process is the LEA self-assessment required of all LEAs, whether they receive McKinney-Vento subgrants or not. Information from the self-assessment guides decisions about the LEAs' needs for on-site monitoring, continued desk review, and/or technical assistance. Program issues, in terms of both compliance and quality, are often apparent from the self-assessment, and in many cases are already being addressed as a result of their own self study. Other issues might arise during telephone conferencing, regional meetings, or review of documents, leading to more intensive review. In many of these cases, technical assistance is often provided along with more focused compliance monitoring as needed. On-site reviews are automatic for subgrantees, with annual site visits by the State Coordinator, but also occur for those LEAs for which the desk review is not sufficient.

We collaborate routinely with Title I, including a homeless review as part of their monitoring schedule. Regional meetings are also conducted in collaboration with Title I for purposes of exchanging information about legislative requirements and offering professional development activities related to the implementation of quality programs. We are fortunate to have very positive and productive working relationships across federal programs at the state level, and encourage local LEAs to work toward a collaborative approach, as well. In states as small as ours, such collaboration is imperative for maximizing personnel and other resources; and the impact on programs when people combine their strengths toward common goals is significant.

We always send monitoring protocols in advance so that there are no surprises during the interviews.

We always send monitoring protocols in advance so that there are no surprises during the interviews, and so that they can be prepared with adequate documentation. If sufficient evidence is not available during the site visits, we probe for further information, sometimes requesting that additional documentation related to compliance issues be provided.

Follow-up reports are sent after each monitoring visit to share observations, strengths and weaknesses, and to notify LEAs of any corrective action needed. We confer by phone to agree on a timeline for corrective action and discuss any need for technical assistance to address compliance issues.

Scenario 3 — Large state, some urban LEAs, many LEAs in rural communities

Our state's monitoring system monitors approximately one-third of our LEAs every year. After the LEAs to be monitored are determined, the State Coordinator reviews the list and begins preliminary desk monitoring for the selected LEAs. After determining the status of program implementation, whether the LEA is receiving McKinney-Vento funds, and whether there is any indication of compliance issues, the State Coordinator meets with members of the SEA monitoring team to provide a homeless education program interview protocol to be included in the SEA monitoring process. Since we are a large state covering long distances, we often contract with local individuals who are trained to assist SEA federal program personnel with the required monitoring. In some communities, we are developing a pool of individuals from local colleges and community agencies, retired educators, volunteer tutors, etc., who are trained to assist with monitoring activities. As these contractors are trained regarding homeless education program requirements, they are also sometimes employed to assist with the monitoring of additional LEAs with a focus on McKinney-Vento compliance. This is especially helpful in rural areas, reducing travel costs associated with on-site monitoring.

This three-year cycle provides the safety net for monitoring, with each LEA having an on-site monitoring visit at least once during the cycle. Additional McKinney-Vento monitoring activities include the following:

- All McKinney-Vento subgrantees are desk reviewed annually through expenditure reports, year-end data collection, and the narrative report required by their grant. If there are issues requiring attention, the State Coordinator schedules telephone conferencing or site visits as needed.
- Video conferences are scheduled every other month for grantees to discuss problems or issues with implementation of their grants and share successes. This allows the State Coordinator to monitor general progress and identify any specific areas of concern in a particular LEA.
- All LEAs are required to submit a Consolidated Application to the SEA, including their plan for identifying homeless children and youth in their school community and addressing their needs. These documents are reviewed annually, noting any areas of concern for follow-up. For example, LEAs reporting no homeless students receive follow-up phone calls or e-mails requesting further information about their outreach and identification process. This often leads to the provision of technical assistance to strengthen their efforts at identifying and enrolling homeless children and youth.
- At the conclusion of each on-site monitoring visit, the LEA receives a report from the State Coordinator that details the results of the visit and any compliance issues that need to be addressed. Observations are also noted regarding the quality of program implementation, areas that are not necessarily compliance issues but need to be strengthened, and information about technical assistance and other available resources.

Scenario 4 — Medium-sized state, mostly rural

Every LEA in our state that receives Title I funds is monitored on-site at least once every three years. We conduct McKinney-Vento reviews as part of that process. The State Coordinator provides a monitoring protocol for use by the state team, with additional questions for LEAs with McKinney-Vento subgrants. All LEAs are visited during this three-year cycle, with follow-up visits from the State Coordinator for Homeless Education as needed, especially if compliance issues arise during the state monitoring.

In addition to the three-year cycle of state monitoring of all federal programs, the State Coordinator reviews annual plans from each LEA along with year-end data reports required by the U.S. Department of Education, with follow-up requests for further information if ample evidence of program requirements has not been provided. A recent addition to our overall monitoring process has been an online survey of all LEAs, those with and without subgrants. NCHE helped us to design the survey, familiarized us with the technology, arranged the use of its KeySurvey account, and assisted with any technological glitches. This online survey has enabled us to identify LEAs that need immediate assistance and has allowed us to see "red flags" or areas of potential concern, in terms of both compliance and program quality. This approach to the survey has also resulted in a considerable increase in our data collection response rate.

We encourage local liaisons to work closely with community agencies to determine the extent to which homeless families are being identified and children are being enrolled.

We encourage the local homeless education liaisons in all LEAs to work closely with community agencies to determine the extent to which homeless families are being identified and children are being enrolled. This requires a commitment to go beyond school-based data collection in reporting to the state.

The State Coordinator sends each local liaison a report after each site visit with the results of monitoring activities and any corrective action needed.

Problems and Potential Solutions

The following table represents problems, obstacles, and issues encountered by State Coordinators in the implementation of the effective monitoring of LEAs. The table also provides suggested strategies and solutions offered by State Coordinators and others with monitoring experience.

Problem	Strategy/Solution
Large number of LEAs; cannot visit all SEA conducts only desk monitoring State Coordinator wears many hats and is assigned to McKinney-Vento for a small percentage of time	1. Develop a tier system, conducting site visits for those with the least evidence of a quality program; use desk monitoring for those with established programs; develop a survey instrument to help determine which LEAs might require a site visit. 2. Rotate site visits over a series of years. 3. Collaborate with Title I to include McKinney-Vento questions in their monitoring schedule; follow up with phone calls or e-mail with further questions as needed. 4. Train colleagues in the field to conduct on-site visits, with phone/e-mail follow-up as needed. 5. Use interactive video conferencing to replace site visits for LEAs with video capacity.
Lack of incentive for LEAs without subgrants Resistance on the part of LEAs to go beyond minimal compliance with legislation Minimal approach at state level to monitoring activities	1. Require consolidated planning where possible so that McKinney-Vento requirements are covered and held accountable. 2. Send official communication to LEA Superintendents and School Board Chairpersons. 3. Offer on-site training to educate school officials. 4. Develop a McKinney-Vento 101 presentation for use with school personnel who lack an understanding of the McKinney-Vento Act. 5. Develop a barrier-tracking instrument, including the collection of specific information from community agencies, comparing the number reported homeless with the number enrolled. 6. Work with Title I state personnel to add language to the Title I, Part A application to describe coordination with the homeless education program.
High turnover of local liaisons	1. Maintain a contact list of local liaisons by LEA and update it regularly. 2. Develop a routine schedule for e-mail communication (perhaps monthly) to remain aware of pending changes and prepare for transition. 3. Identify a pool of seasoned and stable local liaisons to provide mentoring (a buddy system) for new local liaisons. 4. Develop a "care package" to send to new local liaisons who arrive after training events are completed.
Poor attendance at trainings	1. Use web-based training; customize training for the most needy LEAs; cluster trainings for groups with similar needs; large states could arrange regional trainings via web; see NCHE website (*http://www.serve.org/nche/training.php*) for other training support information. 2. Provide incentives, such as door prizes, for attending training events. 3. Pay for travel expenses for local liaisons to attend trainings. 4. Suggest the use of Title I set-asides to support travel costs associated with training events. 5. Include questions about training attendance in the annual data collection or monitoring protocol (as a probe, as this is not mandated by law).

Appendices

The following appendices will assist State Coordinators in designing a monitoring protocol that will fit the needs of their state and comply with federal mandates for monitoring and data collection. Appendices A and B provide the text of the McKinney-Vento Homeless Assistance Act that explains the responsibilities of SEAs and LEAs, respectively. This legislative text can be used as a framework for constructing a state monitoring protocol. Appendix C provides excerpts from the ED monitoring protocol for federal monitoring of state compliance; however, it can be adapted to create a state monitoring protocol of LEA compliance. Appendix D provides sample monitoring instruments in use by current State Coordinators. These instruments can be adapted according to individual state needs.

A. Legislative Requirements for SEAs
B. Legislative Requirements for LEAs
C. Excerpts from the ED Monitoring Protocol
D. Annotated List of Sample Monitoring Tools

Appendix A
McKinney-Vento Homeless Assistance Act
Legislative Requirements for State Coordinators

State Coordinator Responsibilities §722(f)

(f) FUNCTIONS OF THE OFFICE OF COORDINATOR- The Coordinator for Education of Homeless Children and Youths established in each State shall —

(1) 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;

(2) develop and carry out the State plan described in subsection (g);

(3) collect and transmit to the Secretary, at such time and in such manner as the Secretary may require, a report containing such information as the Secretary determines is necessary to assess the educational needs of homeless children and youths within the State;

(4) 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;

(5) 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;
- (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 homeless youths);
- (C) local educational agency liaisons designated under subsection (g)(1)(J)(ii) for homeless children and youths; and
- (D) community organizations and groups representing homeless children and youths and their families; and

(6) 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).

The full text of the McKinney-Vento Homeless Assistance Act is available for downloading at *http://www.serve.org/nche/m-v.php*.

Appendix B
McKinney-Vento Homeless Assistance Act
Legislative Requirements for LEAs

LEA Responsibilities §722(g)(3)(A-D)

(3) LOCAL EDUCATIONAL AGENCY REQUIREMENTS-

(A) IN GENERAL- The local educational agency serving each child or youth to be assisted under this subtitle shall, according to the child's or youth's best interest —

(i) continue the child's or youth's education in the school of origin for the duration of homelessness —

(I) in any case in which a family becomes homeless between academic years or during an academic year; or

(II) for the remainder of the academic year, if the child or youth becomes permanently housed during an academic year; or

(ii) enroll the child or youth in any public school that nonhomeless students who live in the attendance area in which the child or youth is actually living are eligible to attend.

(B) BEST INTEREST- In determining the best interest of the child or youth under subparagraph (A), the local educational agency shall —

(i) to the extent feasible, keep a homeless child or youth in the school of origin, except when doing so is contrary to the wishes of the child's or youth's parent or guardian;

(ii) provide a written explanation, including a statement regarding the right to appeal under subparagraph (E), to the homeless child's or youth's parent or guardian, if the local educational agency sends such child or youth to a school other than the school of origin or a school requested by the parent or guardian; and

(iii) in the case of an unaccompanied youth, ensure that the homeless liaison designated under paragraph (1)(J)(ii) assists in placement or enrollment decisions under this subparagraph, considers the views of such unaccompanied youth, and provides notice to such youth of the right to appeal under subparagraph (E).

(C) ENROLLMENT- (i) The school selected in accordance with this paragraph shall immediately enroll the homeless child or youth, even if the child or youth is unable to produce records normally required for enrollment, such as previous academic records, medical records, proof of residency, or other documentation.

(ii) The enrolling school shall immediately contact the school last attended by the child or youth to obtain relevant academic and other records.

(iii) If the child or youth needs to obtain immunizations, or immunization or medical records, the enrolling school shall immediately refer the parent or guardian of the child or youth to the local educational agency liaison designated under paragraph (1)(J)(ii), who shall assist in obtaining necessary immunizations, or immunization or medical records, in accordance with subparagraph (D).

(D) RECORDS- Any record ordinarily kept by the school, including immunization or medical records, academic records, birth certificates, guardianship records, and evaluations for special services or programs, regarding each homeless child or youth shall be maintained —

(i) so that the records are available, in a timely fashion, when a child or youth enters a new school or school district; and

(ii) in a manner consistent with section 444 of the General Education Provisions Act (20 U.S.C. 1232g).

The full text of the McKinney-Vento Homeless Assistance Act is available for downloading at *http://www.serve.org/nche/m-v.php.*

Appendix C
Excerpts from the U.S. Department of Education (ED) Monitoring of SEAs: Selected Critical Elements

The following chart is excerpted from the monitoring protocol used by ED in the monitoring of SEAs for the 2005-2006 academic year. These excerpts highlight those elements of LEA implementation for which the SEA is held accountable. These requirements are basic for minimal compliance rather than comprehensive for addressing program quality. Most State Coordinators will go beyond this minimal level of compliance in their expectations of LEAs, looking for effectiveness of program implementation in addition to basic compliance with the letter of the law.

SEA Monitoring Area: Instructional Support		
Critical Element	**Suggested Questions**	**LEA Evidence**
MV1.1: SEA collects and reports to ED assessment data from LEAs on the educational needs of homeless children and youth For more detail about requirements, see Sec.722 (f)(3)		Documentation: • Evidence that the LEA collects information on homeless children and youth, including their places of residence • Evidence that the LEA ensures that homeless students are included in statewide assessments • Evidence that the LEA with a subgrant provides the SEA with academic achievement data for homeless students Interview: • LEA describes how it collects local data and transmits information requested on homeless students to the SEA. • LEA describes how it determines if homeless students are being included in statewide assessments.

SEA Monitoring Area: Instructional Support		
Critical Element	**Suggested Questions**	**LEA Evidence**

MV2.2: SEA provides, or provides for, technical assistance for LEAs to ensure appropriate implementation of the statute.
 	
For more detail about requirements, see
Sec.722(e)
Sec.722 (g)(3)(a)
	• What are examples of LEA policies or practices that had to be changed to allow homeless students equal access to school as well as services for which they qualify?
	• What is the LEA's policy for preserving and sending records for identified homeless students? [The monitor will want to see if the LEA responds in a timely manner and attempts to track a homeless student during a highly mobile period.]
	• Does the LEA have a separate program for homeless students where they enroll and attend, apart from their adequately housed peers? [This is illegal; the monitor will want to see if the LEA is segregating homeless students in a separate program within a school or in another location.]
	• What role does the local liaison play in ensuring that homeless students are enrolled and receive assistance with issues such as records transfer, obtaining health and immunization records, and meeting other requirements to which all students are held?
	• How does the local liaison inform shelters, motels, campgrounds, and other locations where homeless families may go, about the educational rights of homeless students? [The monitor is looking for public notices, etc.]
		Documentation:
		• Evidence that the LEA reviews and revises policies and practices to ensure they do not act as barriers to enrolling homeless students, including:
		  ◦ Public notices of rights
		  ◦ Letters, memoranda to assist enrollment
		  ◦ Timeline-waivers for producing medical, school and other records
		  ◦ Waivers for uniform fees
		  ◦ Evidence that the LEA designates a local homeless education liaison
		  ◦ Evidence that the local liaison assists unaccompanied youth with school placement decisions
		  ◦ Evidence that the LEA ensures that transportation to the school of origin is provided
		Interview:
		• LEA describes how it removes barriers to enrolling homeless students.
		• LEA describes how it makes school records available in a timely manner.
		• LEA describes how it provides comparable and coordinated services.
		• LEA describes how it ensures that homeless students are not segregated in separate schools or programs.
		• Local liaison discusses role and describes how homeless students are assisted with immediate enrollment and attending school and how they receive services for which they are eligible.
		• LEA describes how parents are informed of opportunities to participate in the education of their children.

<table>
<tr><th colspan="3">SEA Monitoring Area: Instructional Support (continued from the previous page)</th></tr>
<tr><th>Critical Element</th><th>Suggested Questions</th><th>LEA Evidence</th></tr>
<tr><td>MV3.1: The SEA ensures that LEA subgrant plans for services to eligible homeless students meet all requirements.

For more detail about requirements, see
Sec. 722(e)(1)
Sec. 723</td><td>Describe the needs identified in the LEA homeless application.
Describe the services [assistance] the LEA provides to students served with subgrant funds. [The monitor will want to check to be sure that services are supplemental and not supplanting other services the LEA would be required to provide; LEAs with subgrants may use funds to assist with transportation needs.]</td><td><u>Documentation:</u>
Evidence that the LEA application/plan includes assessment of the needs of homeless students and the supplemental services provided
Evidence that the subgrant expands or improves upon services provided as part of the regular academic program
<u>Interview:</u>
LEA describes the needs of homeless students in the LEA and the supplemental services provided with subgrant funds.</td></tr>
<tr><th colspan="3">SEA Monitoring Area: Fiduciary Requirements</th></tr>
<tr><th>Critical Element</th><th>Suggested Questions</th><th>LEA Evidence</th></tr>
<tr><td>MV3.2: The SEA ensures that the LEA complies with providing comparable Title I, Part A services to homeless students attending non-Title I schools.

For more detail about requirements, see
Sec.1113(c)(3)(A)
Sec. 1112(b)(1)((E)(ii)</td><td>What process does the LEA use to reserve funds?
What supplemental activities are provided with reserved funds?
Do you provide services using reserved funds in locations other than the local school? If so, where?
Are reserved funds used to assist with transporting homeless students? [The answer should be “no” unless the transportation provided is to/from supplemental activities.]</td><td><u>Documentation</u>:
Evidence the LEA reserves funds necessary to provide comparable services to homeless students attending non-Title I schools
<u>Interview</u>:
LEA describes the provision of comparable services for homeless students attending Title I and non-Title I schools.</td></tr>
<tr><td colspan="3">Note: All homeless students are automatically eligible to receive Title I, Part A services. However, this entitlement is based on comparability. If a homeless student is not attending a designated Title I school he or she may be eligible to receive supplemental services. There is no required formula for calculating the reservation of funds. Many states suggest to LEAs a formula or process for reservations and appropriate uses of funds. Title I, Part A funds reserved cannot be used to transport homeless students to and from school as this is prohibited under McKinney-Vento [and would therefore be supplanting].</td></tr>
</table>

SEA Monitoring Area: Fiduciary Requirements (continued from the previous page)		
Critical Element	**Suggested Questions**	**LEA Evidence**
MV3.3: The SEA has a system for ensuring the prompt resolution of disputes. For more detail about requirements, see Sec. 722(g)(C)	• What is the LEA process for resolving disputes with parents or unaccompanied youth? • What assistance do you need from the SEA related to the dispute resolution process? • Have you had any formal disputes? If so, how were they resolved? If so, did you provide parents with a written explanation of the LEA's decision regarding the dispute, including notification of the right to appeal? • Do you maintain a log of disputes, or issues, and report these to the SEA?	<u>Documentation</u>: • Evidence LEA has and implements a process for the prompt resolution of disputes • Evidence that parent or unaccompanied youth disputes are investigated and resolved in a timely manner <u>Interview</u>: • Staff demonstrates understanding of dispute resolution policies and procedures.
Note: Parents and unaccompanied youth may dispute a placement decision when they are homeless. From time to time, a homeless parent (or youth) will move to a new LEA and request that their child (or the youth) be allowed to remain in the school of origin that is in another LEA. If the LEA where the parent/youth currently resides declines this request, the local liaison must utilize a dispute resolution process. SEAs are required to have this process in place and inform LEAs of their responsibilities in resolving disputes.		

Appendix D
Annotated List of Sample Monitoring Tools

The following is an annotated list of selected monitoring tools submitted by State Coordinators for Homeless Education. These tools represent the wide array of monitoring resources already developed to support a comprehensive monitoring protocol. The reader is invited to examine these tools for their utility and appropriateness to unique state needs. Each tool may be adopted as is, adapted with slight changes, or revised significantly to create a customized and state-specific collection of monitoring tools. As other states finalize and make available similar types of monitoring tools, NCHE will post them to the web address listed below.

Note: The sample tools in this annotated list are available for downloading from the Online Forum on the NCHE website at *http://www.serve.org/nche/forum/prog_eval.php*.

1. **Homelessness: Local Program Planning and Review Guides Services for Homeless Children and Youth**, Iowa Department of Education

   This resource was designed for use by LEA personnel as a self-assessment tool to guide the development of quality policies, procedures, and programs to serve homeless children and youth. Introductory information provided includes relevant definitions and citations from legislation. The resource includes two basic service checklists plus a comprehensive program review guide.

2. **Title X – Homeless Education Program Review**, Oregon Department of Education

   This resource is available in a basic version for all LEAs and an expanded version for subgrantees. A LEA homeless education plan checklist is also included.

3. **McKinney-Vento Homeless Education Program Review**, South Carolina Department of Education

   The monitoring questions contained in this resource are formatted for interviewing purposes with columns for noting compliance and documentation of evidence.

4. **Local Education Agency Monitoring Instrument, Program Desk Audit Form, and McKinney-Vento Homeless Accountability Data Form**, Kentucky Department of Education

   These resources provide examples of site visit protocols and desk-review protocols. An accompanying document provides eight basic questions regarding homeless education included in a LEA Title I monitoring process.

5. **Compliance Program Review – McKinney-Vento Homeless Education Assistance**, and **Compliance Program Review – All Title I Schools**, Nebraska Department of Education

   The first resource is to be used for monitoring homeless education programs, with compliance criteria along the left and room for notes about supporting data and the district response along the right. The second resource includes the homeless education portion of the Nebraska Title I monitoring process.

6. **Homeless Education (HE) Ongoing Program Self-Evaluation Tool for Categorical Program Monitoring (CPM): An Ongoing Monitoring Process** and **Instrument for Categorical Program Monitoring**, California Department of Education

The self-evaluation tool is designed to assist LEAs in creating and maintaining a homeless education program that complies with the McKinney-Vento Homeless Assistance Act. The instrument for categorical program monitoring provides the homeless education portion of California's overall monitoring protocol for federal programs.

7. **Campus Self-Assessment Guide for the Education of Students in Highly Mobile and Homeless Situations**, Texas Homeless Education Office

This self-assessment tool assists schools in determining the adequacy of their current services to students in homeless situations. Chapters include questions to answer to evaluate the school's homeless education program and focus on the following four areas: Awareness/Training, Identification/Enrollment, Delivery of Services, and Interagency Coordinator. Although designed for program monitoring at the school level, the guide can be adapted easily for use at the LEA level.

8. **McKinney-Vento Checklist**, Wisconsin Department of Public Instruction

This resource provides a basic checklist of 26 monitoring items for LEAs to submit annually to the SEA. An accompanying tool provides expanded questions for monitoring McKinney-Vento grant programs.

9. **McKinney-Vento Program Monitoring**, Virginia Department of Education

This resource provides a bulleted list of questions with an accompanying chart to record monitoring observations and note follow-up action. It provides legislative references where appropriate.