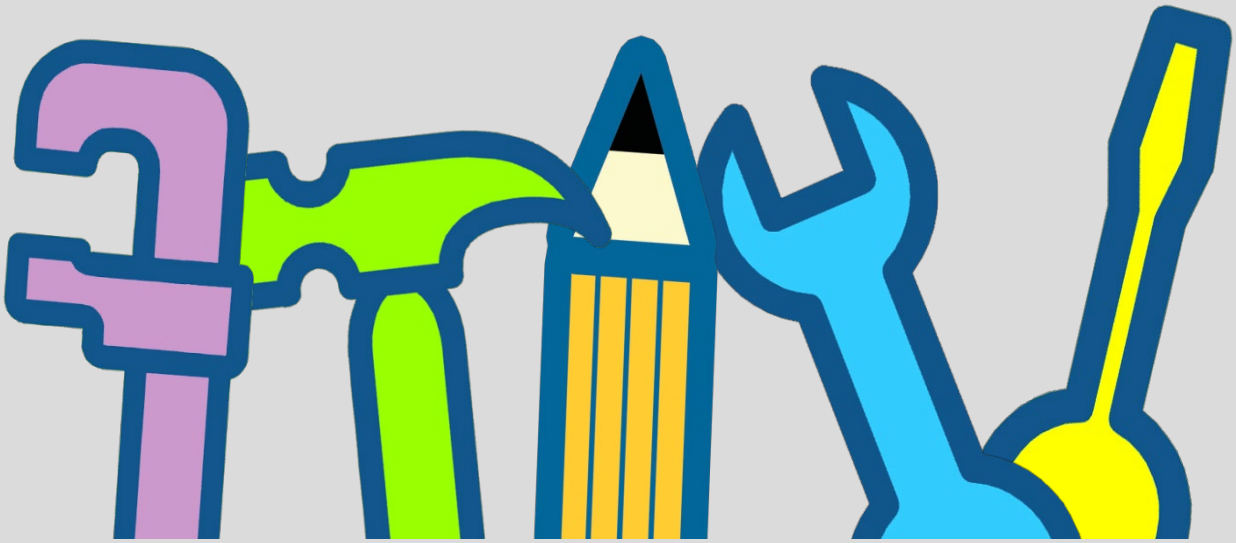
The National Center for Homeless Education's

Homeless Liaison Toolkit

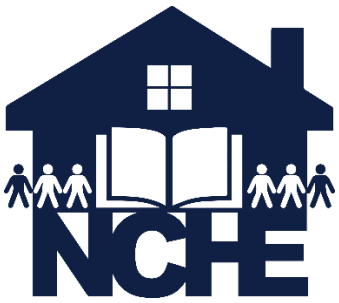
2020 Edition



Homeless Liaison Toolkit

August 2020

National Center for Homeless Education



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

National Center for Homeless Education (NCHE)
5900 Summit Avenue, Dixon #201, Browns Summit, NC 27214
NCHE Helpline: 800-308-2145
Email: homeless@serve.org
NCHE Website: https://nche.ed.gov/

The content of this publication does not necessarily reflect the views or policies of the U.S. Department of Education; nor does mention of trade names, commercial products, or organizations imply endorsement by the U.S. Government. This document was produced with funding from the U.S. Department of Education under contract no. ED-47QRAA19D006U.

Permission granted to reproduce this document.

Chapter One: Overview and History

Section 1.1 Why the *Toolkit*

Did you know that:

- Homeless children and youth must have equal access to the same free, appropriate public education, including a public preschool education, as provided to other children and youth?
- Any requirements in laws, regulations, practices, or policies that may act as a barrier to the identification, enrollment, attendance, or success in school of homeless children and youth must be eliminated?

Do you know:

- What potential barriers to identification, enrollment, attendance, and success in school may exist in local policies and procedures?
- How those barriers may be alleviated?
- What local educational agencies (LEAs or school districts) are required to do to uphold rights and ensure services for homeless children and youth?

Every LEA must know this information in order to carry out the mandates in Subtitle IX-A of the McKinney-Vento Homeless Assistance Act, as amended by the Every Student Succeeds Act. (Throughout the *Toolkit,* we will refer to the law as the McKinney-Vento Act.)

This *Toolkit* provides clear and specific explanations of the provisions of the McKinney-Vento Act and includes practices, procedures, and tools gathered from effective local homeless education programs. New local liaisons, as well as experienced liaisons, will be able to use the *Toolkit* to understand the law and learn ways to improve their programs. It serves as both an orientation manual for new local liaisons and as a ready reference for both new and experienced liaisons.

Section 1.2 Educational Challenges of Homeless Children & Youth

The number of homeless children and youth enrolled in school has more than doubled since the U.S. Department of Education began collecting the information in School Year 2004-05, with 1,508,265 students identified in School Year 2017-18 (NCHE, *Federal Data Summary School Years 2015-16 to 2017-18: Education for Homeless Children and Youth)*. An inadequate stock of affordable housing, fluctuating unemployment rates, high health costs, and natural disasters combined with shrinking public resources has resulted in a steady increase of the number of children experiencing homelessness. (For a publication that summarizes data on homeless children and youth submitted to the U.S. Department of Education, see Section 1.5 Useful Links).

Homeless children and youth face many educational barriers due to the disruption and trauma of not having a fixed, regular, and adequate place to live. Most face educational disruption due to changing schools as they move from one temporary location to another. Homeless children and youth also have higher incidences of illness, depression, and exposure to violence than their stably housed peers. Specific educational challenges faced by homeless students include

- not being identified for services;
- difficulty enrolling without records or, in the case of an unaccompanied homeless youth, without a parent or guardian present;
- difficulty regularly attending school;
- lack of stable transportation;
- frequent school changes;
- falling behind in school;
- not accruing credits on time;
- lack of basic needs including food, clothing, and adequate housing;
- stress, depression, trauma; and
- embarrassment and stigma related to their housing conditions.

Many homeless youth are also *unaccompanied*, meaning they are not in the physical custody of a parent or guardian. Being both homeless and unaccompanied leaves youth fending for themselves in a world where they are vulnerable to a myriad of potentially life-threatening dangers.

For all these reasons, school can often be the one place of stability, safety, and support in the tumultuous lives of these students.

Section 1.3 History of the McKinney-Vento Act

The first Federal law to directly impact the education of students experiencing homelessness was enacted in 1987 as part of the Stewart B. McKinney Homeless Assistance Act. The McKinney Act, which originally contained 15 programs designed to address the needs of homeless persons, contained a subtitle with the purpose of ensuring that children and youth experiencing homelessness could enroll in school without barriers. Since the initial passage, the homeless education law has been reauthorized with stronger and more specific requirements for State educational agencies (SEAs) and LEAs to ensure the immediate enrollment, school stability, and academic support needed to increase the educational success of homeless children and youth.

The McKinney-Vento Act was most recently reauthorized by the Every Student Succeeds Act of 2015 (ESSA), which reauthorizes the Elementary and Secondary Education Act (ESEA). Under the previous version of ESEA (the No Child Left Behind Act), the education of homeless children and youth was included in Title X, Part C. Under ESSA, homeless education is included in Title IX, Part A.

Section 1.4 Education for Homeless Children and Youths Program

The Education for Homeless Children and Youths (EHCY) program at the U.S. Department of Education (ED) is overseen by a Federal coordinator. The McKinney-Vento Act authorizes ED to provide grants to SEAs to ensure that homeless children and youth have equal access to the same free, appropriate public education, including a public preschool education, as provided to other children and youth [42 U.S.C. § 11431(1)].

The grants, which are based on a proportion of a State's Federal allocation under Title I, Part A of the Elementary and Secondary Education Act, are used to

- Carry out the policies in the Act;
- Provide services and activities to improve the identification of homeless children and youths and enable such children and youths to

enroll in, attend, and succeed in school, including in preschool programs;

- Establish or designate in the SEA an Office of the Coordinator for Education of Homeless Children and Youths that can sufficiently carry out the duties described for the Office;
- Prepare and carry out the State plan for serving homeless children and youths;
- Develop and implement professional development programs for local liaisons and other local agency educational personnel to improve their identification of homeless children and youths and heighten their awareness of and capacity to respond to specific problems in the education of homeless children and youths [42 U.S.C. § 11432(d)].

SEAs must distribute no less than 75% of their annual McKinney-Vento allocation to local school districts in subgrants and may retain the rest for State level activities (States funded at the minimum level may reserve up to 50% of their allocation.) [42 U.S.C. §§ 11432(e)(1)-(2)]. Subgrants are awarded competitively to LEAs based on their need and the quality of the applications submitited [42 U.S.C. § 11433(c)(1)]. Currently, nearly 25% of LEAs across the nation receive McKinney-Vento subgrants (NCHE, *Education for Homeless Children and Youths Program: Analysis of Federal Data Collection and Three-Year Comparison School Years 15-16 to 17-18*).

As noted above, every SEA has a State Coordinator for homeless education whose responsibilities are to carry out the activities specified in the law. Contact information for State Coordinators can be found on the website for the National Center for Homeless Education (NCHE) at: https://nche.ed.gov/data/. Among other responsibilities, State Coordinators support local liaisons by providing technical assistance about State and Federal policies as well as administering the subgrant process that provides funding to LEAs.

In addition, all SEAs are required to submit annual data to ED on homeless children and youths enrolled in school and to conduct monitoring of all LEAs to assess compliance with the provisions in the McKinney-Vento Act.

Whether they receive a subgrant or not, all LEAs are required to implement the provisions in the McKinney-Vento Act.

ED established a national technical assistance center in 1997 to better assist both SEAs and LEAs with implementation of the McKinney-Vento Act. The National Center for Homeless Education (NCHE) based at the SERVE Center at the University of North Carolina Greensboro provides a wealth of resources, including a comprehensive website, a toll-free helpline (800-308-2145), online and onsite trainings, and informational resources, including the *Homeless Liaison Toolkit*.

Section 1.5 Useful Links

Title VII, Subtitle B of the McKinney-Vento Homeless Assistance Act (Education for Homeless Children and Youths)
42 U.S.C. §§ 11431-11434A
http://uscode.house.gov

National Center for Homeless Education, Data and Statistics on Homelessness
https://nche.ed.gov/data-and-stats/

National Center for Homeless Education
Federal Data Summary School Years 2015-16 to 2017-18: Education for Homeless Children and Youth
http://nche.ed.gov/wp-content/uploads/2020/01/Federal-Data-Summary-SY-15.16-to-17.18-Published-1.30.2020.pdf

State Coordinator Contact Information
https://nche.ed.gov/data/

Chapter Two: Local Educational Agency and Local Liaison Responsibilities

Section 2.1 Local Educational Agency Responsibilities Defined in the McKinney-Vento Act and Non-Regulatory Guidance

Local educational agencies (LEAs) or school districts are instrumental in ensuring that the rights and services guaranteed in the McKinney-Vento Act are implemented throughout the school district. All LEAs must follow the requirements of the McKinney-Vento Act, whether or not they have a McKinney-Vento subgrant.

Section 2.1.1 LEA Requirements in the McKinney-Vento Act

The McKinney-Vento Act provides a number of LEA requirements for serving homeless children and youths [42 U.S.C. § 11432(g)(3)]. The tasks outlined in the law are summarized below.

In general, LEAs must:

- continue a homeless child's or youth's education in the school of origin for the duration of homelessness and for the remainder of the academic year, if the child or youth becomes permanently housed during an academic year; or
- enroll the homeless 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 [42 U.S.C. § 11432(g)(3)(A)].

School stability provisions require LEAs to:

- presume that keeping the child or youth in the school of origin is in the child's or youth's best interest, except when doing so is contrary to the request of the child's or youth's parent or guardian, or (in the case of an unaccompanied homeless youth) the youth;

- consider student-centered factors related to the child's or youth's best interest, including factors related to the impact of mobility on achievement, education, health, and safety of homeless children and youths, giving priority to the request of the child's or youth's parent or guardian or (in the case of an unaccompanied homeless youth) the youth;
- provide a written explanation of the reasons for the LEA's decision, including information regarding the right to appeal, to the parent or guardian of a homeless student or to an unaccompanied homeless youth, if the LEA determines it is not in the best interest of the child to attend the school requested; and
- ensure, in the case of an unaccompanied homeless youth, that the local liaison assists in placement or enrollment decisions, gives priority to the views of the youth, and provides notice of the right to appeal an LEA's best interest determination that is contrary to the youth's request [42 U.S.C. § 11432(g)(3)(B)].

Regarding enrollment and records, the enrolling school must

- immediately enroll the child or youth, even without records that are normally required for enrollment or if the child or youth has missed application or enrollment deadlines during any period of homelessness;
- contact the school last attended for relevant records;
- assist with obtaining immunizations or other required health records; and
- make any records ordinarily kept by the school available in a timely fashion when the child or youth enrolls in a new school or LEA [42 U.S.C. § 11432(g)(3)(C)-(D)].

If a dispute arises over eligibility, school selection, or enrollment in a school:

- the child or youth must be immediately enrolled in the school in which enrollment is sought, pending final resolution of the dispute, including all available appeals;
- the parent or guardian of the child or youth or (in the case of an unaccompanied youth) the youth must be provided with a written explanation of any decisions related to eligibility, school selection, or enrollment made by the school, LEA, or State educational agency (SEA), including the rights to appeal the decision;

- the parent, guardian, or unaccompanied youth must be referred to the local liaison to carry out the dispute resolution process; and
- in the case of an unaccompanied youth, the local liaison must ensure that the youth is immediately enrolled in the school in which the youth seeks enrollment pending resolution of the dispute [42 U.S.C. § 11432(g)(3)(E)].

Privacy provisions require LEAs to:

- treat information about a homeless child's or youth's living situation as a student education record and not deem it to be directory information [42 U.S.C. § 11432(g)(3)(G)].

Comparable services provisions require LEAs to:

- provide services comparable to those offered to other students in the school [42 U.S.C. § 11432(g)(4)].

Coordination provisions require LEAs to:

- coordinate with local social services agencies and other agencies or entities providing services to homeless children and youths and their families, including services and programs funded under the Runaway and Homeless Youth Act [42 U.S.C. § 11432(g)(5)(A)(i)].

Section 2.1.2 LEA Requirements Mandated for Inclusion in Education for Homeless Children and Youths State Plans

States may have additional policies that LEAs are responsible for implementing related to the education of homeless children and youths. Every SEA is required to have a state plan that includes further LEA responsibilities enforced by the state. State Coordinators can provide information on any additional requirements in each state.

Section 42 U.S.C. § 11432(g)(1) of the McKinney-Vento Act describes State plan components that can impact LEAs, including:

- a description of how homeless children and youths are provided opportunities to meet the same challenging State academic standards as all students are expected to meet;
- a description of the procedures the SEA will use to identify homeless students and assess their needs;

- a description of procedures for the prompt resolution of disputes regarding educational placement;
- a description of programs for school personnel (including local liaisons, principals and other school leaders, attendance officers, teachers, enrollment personnel, and specialized instructional support personnel) to heighten the awareness of the specific needs of homeless children and youths, including children and youths who are runaway and homeless youths;
- a description of procedures that ensure that homeless children and youths who meet the relevant eligibility criteria are able to participate in Federal, State, or local nutrition programs;
- a description of procedures that ensure that homeless children have access to public preschool programs administered by the SEA or LEA as provided to other children in the State;
- a description of procedures that ensure that homeless youths and youths separated from public schools are identified and accorded equal access to appropriate secondary education and support services;
- a description of procedures that ensure that eligible homeless children and youths do not face barriers to accessing academic and extracurricular activities, including magnet school, summer school, career and technical education, advanced placement, online learning, and charter school programs, if they are available at the State and local levels;
- strategies to address problems resulting from enrollment delays caused by requirements of immunization and other required health records; residency requirements; lack of birth certificates, school records, or other documentation; guardianship issues; or uniform or dress code requirements;
- a demonstration that the SEA and LEAs will develop, review, and revise policies to remove barriers to the identification, enrollment, and retention of homeless children and youths, including barriers to enrollment and retention due to outstanding fees or fines, or absences;
- an assurance that the SEA and LEAs will adopt policies to ensure that homeless children and youth are not segregated or stigmatized;
- an assurance that LEAs designate an appropriate staff person who is able to carry out the duties required of the local liaison position;

- an assurance that transportation will be provided, at the request of a parent or guardian (or liaison in the case of an unaccompanied homeless youth), to and from the school of origin;
- an assurance that the SEA and LEAs will adopt policies and practices to ensure participation by the liaison in professional development and other technical assistance activities provided as determined appropriate by the Office of the State Coordinator; and
- a description of how homeless youth will receive assistance from counselors to advise and prepare them for college.

Section 2.2 Homeless Liaison Responsibilities

The local liaison is the key to ensuring homeless children and youths receive the services they need. Required in all LEAs regardless of subgrant status, the liaison is the primary contact between homeless families, school and LEA staff, shelter workers, and other service providers.

In 42 U.S.C. § 11432(g)(6)(A), the McKinney-Vento Act lists the responsibilities of the local liaison. The law states that local liaisons will ensure that

- homeless children and youths are identified by school personnel through outreach and coordination with other agencies;
- homeless children and youths are enrolled in, and have a full and equal opportunity to succeed in, school;
- homeless families, children, and youths have access to and receive educational services for which they are eligible, including Head Start programs, early intervention services under Part C of the Individuals with Disabilities Education Act (IDEA), and other preschool programs administered by the LEA;
- homeless families, children, and youths receive referrals to health care services, dental services, mental health and substance abuse services, housing services, and other appropriate services;
- the parents or guardians of homeless children and youths are informed of the educational and related opportunities available to their children and are provided with meaningful opportunities to participate in the education of their children;
- public notice of the educational rights of homeless children and youths is disseminated in locations frequented by parents or guardians of homeless children and youths, and unaccompanied

youths, including schools, shelters, public libraries, and soup kitchens, in a manner and form understandable to parents and guardians and unaccompanied youth;

- enrollment disputes are mediated according to 42 U.S.C. § 11432(g)(3)(E);
- the parent or guardian of a homeless child or youth, and any unaccompanied homeless youth, is fully informed of all transportation services, including transportation to the school of origin;
- school personnel who serve homeless children and youths receive professional development and other support;
- unaccompanied homeless youths are enrolled in school, have opportunities to meet the same challenging State academic standards established for other students, and are informed of their status as independent students and assisted to receive verification of their status for completing the Free Application for Federal Student Aid (FAFSA).

Section 2.3 Become Familiar with the Liaison Role

The local liaison can fulfill many roles. In carrying out the responsibilities of the position, this person will be an administrator, a professional development coordinator, a school social worker, and an outreach specialist. Therefore, the LEA must provide the liaison with sufficient time and capacity to carry out the required set of duties to ensure that the LEA is in compliance with the law. The LEA will need to shape the position based on its current needs in serving homeless children and youths. Section 15 Resources and Tools contains good practices instrumental to helping local liaisons prioritize tasks.

Over time, the local liaison's responsibilities should be revised to reflect the following: the number of children and youths identified, trends in poverty and homelessness, the amount of support from community agencies and other entities serving homeless families and youth, the level of awareness in both the schools and the community of homeless student needs and related legal requirements, and the level of implementation that has occurred in the LEA. This will allow the district to appoint a liaison with the skills and knowledge most likely to meet the needs of homeless children and youths.

Appendix 2.A "Homeless Liaison Responsibilities" provides the text from the McKinney-Vento Act related to the duties of the local liaison.

Section 2.3.1 Review the McKinney-Vento Act

Local liaisons should be familiar with the exact language of the McKinney-Vento Act. While the law may not be easy reading, having certain sections committed to memory, or at least at your fingertips, will assist you with teasing out the nuances of implementation when questions arise. Appendix 2.B "Quick Guide to Important Sections of the McKinney-Vento Act" is a compilation of key portions of the law for easy reference.

Section 2.3.2 Learn about Your LEA's Services for Homeless Children and Youths

As a new local liaison, it is important to learn as much as possible about your LEA's implementation of the McKinney-Vento Act. Table 2.1 "Understanding the Homeless Education Program in My LEA" provides questions and possible sources for answers that will help you understand your LEA's approach to serving homeless children and youths. Appendix 2.C "Understanding My LEA's Homeless Education Program" provides a worksheet to help you record responses to the questions.

Table 2.1 Understanding the Homeless Education Program in My LEA

Question	Source
Who is the State Coordinator for the homeless education program in my State? What technical assistance and training does the State Coordinator provide to LEAs?	NCHE Website; SEA Homeless Education Website
How much time is allocated to the local homeless liaison position? What additional staff support is in place?	Supervisor
How many homeless children and youths did the LEA identify last year? Are the numbers identified increasing or decreasing? By how much?	LEA Data Manager
Does the LEA have a McKinney-Vento subgrant? If so, what are the approved activities to serve homeless children and youths? What are my reporting responsibilities? For how long will the LEA receive funds through this grant?	McKinney-Vento Subgrant Application

Question	Source
How much money is set aside for services for homeless children and youths through Title I, Part A? How was the amount of these funds determined? On what were these funds spent last year? How may they be accessed?	Title I Coordinator, Consolidated Application
What are the challenges to implementing the McKinney-Vento program in the LEA?	Phone and Email Logs, Documentation on Disputes
What local policies and procedures are in place to support services for homeless children and youths? What policies or procedures create barriers to the education of homeless children and youths?	LEA Policy Handbook, School Board Policies, Phone and Email Logs, Documentation on Disputes, LEA Program Coordinators (Tutoring Programs, Nutrition, Special Education, English Language Learning, Migrant)
What data must be collected on homeless children and youths, and what procedures are in place to collect and report this data?	State Coordinator, LEA Data Coordinator
How many homeless children and youths were transported to their school of origin in the past year? What are the procedures for arranging transportation?	Pupil Transportation Director, Student Files
What McKinney-Vento compliance issues have been identified in my district?	SEA Monitoring Reports
What is the local dispute process for the McKinney-Vento program, and who is involved in the process other than the liaison?	Written Dispute Policy
What homeless education awareness activities have taken place in the LEA? What role groups have been involved? Were the activities effective?	Meeting Agendas and Notes
With whom are the primary community agencies collaborating to serve homeless children and youths?	Meeting Agendas and Notes, Phone and Email Logs
Are posters on McKinney-Vento services displayed in all schools? When was the last time posters and other awareness materials were placed in each school in the LEA?	Observation in Schools, Budget or Fiscal Office

You may not be able to find answers to all these questions immediately. Nevertheless, whatever information you do find will help orient you to the role of the local liaison. Moreover, these questions will guide you in

- keeping abreast of challenges, processes, and procedures related to serving homeless children and youths in the LEA;

- fostering conversations with others involved in serving homeless children and youths in the LEA and community; and
- establishing files of information that can be passed along to a liaison who might succeed you in the position.

Section 2.3.3 Contact Key Personnel and Agencies

Many new local liaisons feel overwhelmed by the scope of their responsibilities. However, keep in mind that there are many people, programs, and agencies to assist liaisons in serving homeless children and youths. As a new liaison, you should connect with certain key people soon after you assume your position. Chapter 9: Unaccompanied Homeless Youth and Chapter 11: Collaboration provide more details on and strategies for linking homeless students to services and establishing collaborations with external agencies.

Table 2.2 "Key Role Groups and Agencies to Contact" provides a list of people and agencies to contact and what information and services they may provide.

Table 2.2 Key Role Groups and Agencies to Contact

Person or Agency to Contact	Information or Services Provided
State Coordinator for Homeless Education	Your State Coordinator will be able to link you to essential training for your position, add you to a distribution list for local liaisons to receive routine communication, and link you with other local liaisons for support.
LEA Title I Coordinator	The Title I Coordinator will be able to explain what Title I services are provided to homeless children and youths and how Title I, Part A set-aside funds are spent.
Coordinator for Special Education	The Coordinator for Special Education will explain how children who are homeless and highly mobile can be evaluated and provided services in a timely way even though they may move in and out of the district; also, you should ask to review Individualized Education Plans (IEPs) for homeless children and youth and attend IEP meetings for these students.
Director of Pupil Transportation	Establishing ongoing communication with the Director of Pupil Transportation will ensure that you work together as partners to arrange transportation for homeless students expeditiously.

Person or Agency to Contact	Information or Services Provided
Director of Child Nutrition	The Director of Child Nutrition will explain procedures to ensure homeless children and youths are provided free meals. This happens as soon as the nutrition program is provided the names of students identified as homeless. The Director of Child Nutrition should also notify liaisons of any barriers to providing free meals immediately.
District Data Manager	The District Data Manager can explain the process for the annual collection and submission of data on homeless students. This person is also a great resource for accessing data about the needs of homeless students that can be used to create awareness among school personnel and community members.
Housing and Urban Development (HUD) Programs	Programs that receive funding from HUD are mandated to coordinate with local homeless liaisons. Contacting these agencies and cultivating relationships will help you • understand the "big picture" of homelessness in your LEA; • establish ongoing communication that can assist you with identifying homeless children and youth and linking them to services; and • explore collaborative relationships to share resources.
Shelter Providers	Shelter providers play a key role in helping to identify homeless children and families and referring them to schools. Providing them with your contact information and awareness posters will assist in establishing ongoing communication. To find programs in your community funded by the Runaway and Homeless Youth Act, visit: http://www.acf.hhs.gov/programs/fysb/grants/fysb-grantees
Head Start	Head Start is mandated to prioritize services for young homeless children and to coordinate with homeless liaisons. Contacting the Head Start program in your LEA will assist you with identifying homeless students and exploring collaborative opportunities.

Section 2.3.4 Keep Key Documents on Hand

As the primary person responsible for ensuring the LEA fully implements the McKinney-Vento Act, liaisons must field questions from parents, school staff, community partners, and sometimes even members of the media. They must also provide training in both the LEA and community. In order to quickly and accurately answer questions, liaisons should keep information readily available in either electronic or hard copy files. This practice will also

facilitate consistent answers to questions, reducing the likelihood of mistakes during extremely busy times.

The following documents and information are particularly useful to keep on hand:

- McKinney-Vento Act;
- Education for *Homeless Children and Youths Program Non-Regulatory Guidance*, 2018;
- *Determining Eligibility for Rights and Services Under the McKinney-Vento Act* and the *School Selection* issue briefs published by NCHE;
- LEA and State dispute resolution policies;
- LEA policies related to the enrollment and education of homeless children and youth;
- memoranda and communications from the State Coordinator;
- a copy of the LEA's McKinney-Vento subgrant proposal;
- homeless education program monitoring reports;
- barrier tracking logs (phone and e-mail);
- LEA data on homeless children and youth; and
- community organization contacts for homeless families.

2.3.5 Learn about Key Issues and Best Practices

The field of homeless education is changing rapidly. New trends and issues are continually emerging, and new laws and policies are developed by various programs and agencies on an ongoing basis. Local liaisons have a wealth of resources to help them keep current in the field. Key supports include information, technical assistance, and training provided by the State Coordinator for homeless education.

In addition, note the resources offered by the following organizations:

National Center for Homeless Education (NCHE): NCHE operates the U.S. Department of Education's technical assistance center for the Education for Homeless Children and Youth program, providing a comprehensive website, webinars, onsite trainings, and publications. NCHE also hosts a listserv that provides updates, announcements, and links to resources. A Helpline to assist those who serve homeless children and youth with understanding and implementing the law is available via both phone (800-308-2145) and email (homeless@serve.org).

National Association for the Education of Homeless Children and Youth (NAEHCY): NAEHCY is a national membership association dedicated to ensuring educational equity and excellence for children and youth experiencing homelessness. NAEHCY hosts an annual conference for State Coordinators, local homeless liaisons, service providers, researchers, and advocates.

SchoolHouse Connection: SchoolHouse Connection is a national non-profit organization working to overcome homelessness through education. They provide strategic advocacy and practical assistance in partnership with early childhood programs, schools, institutions of higher education, service providers, families, and youth.

Section 2.4 Useful Links

McKinney-Vento Homeless Assistance Act **42 U.S.C. §§ 11431-11434a** **https://uscode.house.gov/view.xhtml?path=/prelim@title42/chapter119/subchapter6/partB&edition=prelim**
U.S. Department of Education ***Education for Homeless Children and Youth Program*** ***Non-Regulatory Guidance*** **https://www2.ed.gov/policy/elsec/leg/essa/160240ehcyguidanceupdated082718.docx**
NCHE Issue Brief: ***Local Homeless Education Liaisons: Understanding Their Role*** **https://nche.ed.gov/wp-content/uploads/2018/10/liaisons.pdf**
NCHE Issue Brief: ***Local Homeless Liaisons: Important Information for New Liaisons*** **https://nche.ed.gov/wp-content/uploads/2018/10/new-liaisons.pdf**
NCHE Issue Brief: ***Local Homeless Liaisons: Making the Right Selection and Supporting Their Effectiveness*** **https://nche.ed.gov/wp-content/uploads/2018/10/liaison-selection.pdf**

Section 2.5 Resources and Tools for Chapter Two

Appendix 2.A Homeless Liaison Responsibilities
Appendix 2.B Quick Guide to Important Sections of the McKinney-Vento Act
Appendix 2.C Understanding My LEA's Homeless Education Program

Chapter Three: Identification of Students Experiencing Homelessness

As the first of the local liaison responsibilities outlined in the McKinney-Vento Act, identification of students in homeless situations is one of the core duties for a liaison and one that is likely to require a significant amount of the liaison's time. Identifying all students experiencing homelessness is critical as it allows liaisons to help students who may have difficulty with enrollment, allows liaisons to connect students to educational support and community services, and increases the likelihood that homeless students will overcome the extra educational challenges they face.

Section 3.1 The Definition of Homelessness

The McKinney-Vento Education for Homeless Children and Youth Act provides a definition of homeless children and youths to be used by state educational agencies (SEAs) and local educational agencies (LEAs). It defines homeless children and youth to be those who lack a fixed, regular, and adequate nighttime residence. Under the larger umbrella of lacking a fixed, regular, and adequate nighttime residence, the law also provides several examples of situations that meet the definition. The examples include children and youths:

- sharing housing due to a loss of housing, economic hardship, or a similar reason;
- living in hotels, motels, trailer parks, or camping grounds due to a lack of alternative adequate housing;
- living in emergency or transitional shelters;
- abandoned in hospitals;
- living in a public or private place not designated for, or normally used as, a regular sleeping accommodation for human beings;
- living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar places;
- living in one of the above circumstances and who are migratory according to the definition in Section 1309 of the Elementary and Secondary Education Act of 1965 [42 U.S.C. § 11434a(2)].

When considering if a student meets the criteria in the definition provided by the law, it is important to remember that the list provided is only a guide, and more situations exist that meet the criteria than are actually listed. However, liaisons must always rely on the criteria outlined in the law of lacking fixed, regular, and adequate nighttime residence as the ultimate test of whether a student's housing meets the definition. For more on the specific nuances related to eligibility criteria for students, see Chapter 4: Determining Eligibility.

Section 3.2 The Role of the Liaison in Identifying Homeless Students

While it is true that local liaisons themselves will and should identify many of the homeless students in an LEA, the actual charge in the law is for local liaisons to ensure that homeless students are identified "by school personnel through outreach and coordination activities with other entities and agencies" [42 U.S.C. § 11432(g)(6)(i)]. The language in the law means two important things. First, local liaisons are not expected to do the work alone and bear the sole responsibility for identifying students. Second, collaboration with other educational programs and even agencies outside the LEA is not only encouraged but is expected. The collaborations involved in ensuring students in homeless situations are identified may be very informal or be structured around formal activities and relationships.

Section 3.2.1 Collaboration Within the School District

Schools are a social environment as well as a place for learning. Since students and staff spend a large amount of time together, they often learn a good deal about each other. This kind of environment lends itself to many informal opportunities to identify homeless students. For example, a school counselor may identify a student who is homeless after noticing that a student is asking friends to help cover the lunch fee each day. On the other hand, the relaxed environment of the cafeteria can lead to students making comments that are overheard by the cafeteria staff and cause them to notice that perhaps the student is homeless. Essays written by students which reveal the nature of the students' living arrangements can leave teachers wondering what they can do to help homeless students as well. In each of these instances, liaisons can maximize their ability to identify students who qualify as homeless by establishing relationships with the other school staff.

The key in these instances and many others like them is to make sure staff members are aware of the role and identity of the liaison so that they may refer students as situations raise red flags. By providing staff groups within the school district with basic information about the liaison's role and the definition of homelessness, liaisons will achieve greater success with their objective of identifying students in need. (For more information on general collaboration requirements for services provided by the school district, see Chapter 15: Managing the Work.)

School staff who may be particularly helpful in meeting the requirement to identify homeless students include:

- school nurses;
- front office and registration staff;
- truancy and attendance officers;
- cafeteria staff;
- bus drivers;
- school social workers and counselors;
- classroom teachers and aides; and
- administrators, such as principals and directors of special education and Title I.

While informal collaborations within the district are critical, federal education law also includes requirements for more formal collaborations that can increase homeless student identification. For example, in addition to the requirement in the McKinney-Vento Act that liaisons ensure the identification of students by school personnel, Title I, Part A, also includes requirements for collaboration, as does the Individuals with Disabilities Education Act (IDEA). Title I, Part A requires that programs operated under its authority coordinate at the state and local levels [20 U.S.C. § 6311(g)(2)(K) and 20 U.S.C. § 6312(c)(4)]. All districts must also have an application approved by the SEA that addresses Title I, Part A coordination with McKinney-Vento. Child Find provisions in IDEA include a specific requirement that states ensure homeless children with disabilities are identified, located, and evaluated [20 U.S.C. § 1412(a)(3)(A)]. By including language in the McKinney-Vento Act regarding required collaborations, as well as in the federal laws governing other educational and related programs, the responsibility for ensuring collaborations on behalf of homeless students is shared by all the programs involved.

Section 3.2.2 Collaboration with Other Entities and Agencies

As mentioned earlier in Section 3.2, in addition to the responsibility of the liaison to work with other school personnel to identify homeless students, the McKinney-Vento Act also requires liaisons to work with other entities and agencies to identify students without fixed, regular, and adequate housing. By requiring collaboration with entities external to the school district, the law actually reduces the burden on LEAs and liaisons by providing them with an avenue for assistance. For example, many younger children and their parents or guardians temporarily stay at homeless shelters and are therefore easier to identify for services. Head Start programs are specifically charged with serving the students most in need, which makes them a logical partner for identifying both those students in preschool and their older siblings experiencing homelessness, who would benefit from educational services through the LEA. Communities that receive shelter funding through the U.S. Department of Housing and Urban Development also operate what is known as a Continuum of Care (CoC), which represents all stakeholders invested in serving persons experiencing homelessness. The CoC may include shelter providers, food banks, faith-based organizations, and other agencies, making it easy for a liaison to connect with a large number of organizations through one CoC.

While the law is not very specific about the types of activities that should be undertaken to ensure homeless students are identified, it does have one required activity to increase identification: that public notice about the rights of homeless children and youth is disseminated where families are likely to receive services [42 U.S.C. § 11432(g)(6)(vi)]. Schools, family and youth shelters, public libraries, and soup kitchens are all examples of locations where a notice of rights must be posted by the liaison. While not an exhaustive list, other places and organizations with which liaisons may want to work to post a statement of rights include:

- youth organizations,
- transitional living program sites,
- day or community centers,
- Community Action Agencies,
- welfare and housing offices,
- Workforce One offices,
- homeless coalitions,

- free or low-cost health clinics,
- low-cost motels,
- storage facilities,
- check cashing businesses, and
- laundromats.

Section 3.2.3 Strategies to Increase Identification

A variety of strategies exist to increase the identification of students who lack fixed, regular, and adequate housing. Many can be incorporated into other existing activities, reducing the amount of time and cost needed by the LEA to conduct them.

Housing questionnaires

Including a housing questionnaire with a simple statement of rights in the general enrollment and registration packet received by all students as they sign up for school is a good way to ensure the entire student population is informed. By providing the information in all the enrollment packets, no one feels singled out or stigmatized, but even those who are not homeless become more aware of things happening in the community. See Appendix 3.A Sample Housing Information Form.

Enrollment forms for programs serving at-risk students

By reviewing the forms for other educational programs, such as the National School Lunch Program, Title I, or 21st Century Community Learning Centers programs, liaisons can quickly identify students who may qualify as homeless. Cooperative agreements with early childhood programs like Head Start can also lead to questions on enrollment or intake forms that result in referrals to the liaison when a homeless child is identified.

Quick reference lists

Keeping a list of local low-cost motels or shelters discretely located on the desk of enrollment staff for easy reference can help the staff recognize addresses that may indicate homelessness when students enroll.

Cooperative enrollment events

Events like Kindergarten Round-up and Head Start enrollment fairs provide opportunities to identify more students. Many communities also host events referred to as Homeless Connect, which focus on connecting

persons in need with agencies and organizations that can help them, including schools.

Awareness trainings

Strategies for raising the awareness of school staff and community members can include brief updates during regular staff meetings or more intensive workshops that target specific goals related to homelessness and educational outcomes.

Relationship building

By making personal contact with managers at low-cost hotels, social service agencies, local law enforcement, and other public service agencies, liaisons can increase the number of people on the lookout for students in need.

District website

The LEA website often contains the student handbook and other important information targeted to students and their families. It can be a great tool for increasing awareness and disseminating information about the rights of homeless students as well as listing contact information for the liaison.

Attendance hearings

Liaisons may recognize homelessness in students who are under review for attendance problems related to their homelessness which other staff may miss. By either participating in behavior review committees or by training truancy and attendance officers, liaisons can increase the identification of homeless students.

Mailing labels and transportation logs

Checking transportation or address logs may be a good way to identify students who are doubled-up due to loss of housing as liaisons may notice several families in one location. Likewise, working with the transportation department to identify any unusual transportation changes or requests can also result in better identification of homeless students.

Section 3.2.4 Special Populations

The McKinney-Vento Act requires that special attention be given to homeless children and youth who are not already attending school [42 U.S.C. § 11432(g)(7)(C)]. This could include preschool students, students who have dropped out or failed to enroll, or unaccompanied homeless youth. Several tips have already been mentioned regarding early childhood or general enrollment, but liaisons should also take steps to identify those students who are deemed unaccompanied homeless youth. Unaccompanied youth are those not in the physical custody of a parent or guardian [42 U.S.C. § 11434a(6)]. Strategies that may be useful in reaching unaccompanied homeless youths are listed below.

Involving youth

Students who may be too embarrassed to ask for assistance or otherwise trust an adult may be willing to reach out to a liaison if other youth are involved or inform them of their rights.

Surveying youth

Youth may become estranged from their families after enrolling in school; a mid-year youth survey could help identify those students not otherwise identified through enrollment questionnaires. Liaisons also may be able to work with their health services offices to include this information as a part of the Youth Risk Behavior Survey (YRBS), a national, school-based survey to evaluate adolescent behaviors that harm health and well-being.

Targeting outreach

Notices regarding the rights of youths experiencing homelessness should be written in a youth friendly format and posted in places where youth may see them. Working with street outreach teams for youth can also be a good way to reach young people.

Incorporating the topic

The topic of homelessness can be incorporated into the school curriculum or school assemblies. This not only reaches youth who are homeless but also housed youth with homeless friends who may be willing to help connect them to liaisons. For example, students could be assigned a current events project in their civics course on the topic of homelessness.

Section 3.3 Useful Links

Issue Brief: ***Identifying Children and Youth in Homeless Situations***
https://nche.ed.gov/wp-content/uploads/2018/10/identification.pdf

Tip Sheet: Potential Warning Signs of ***Homelessness***
http://nche.ed.gov/wp-content/uploads/2019/12/Common-Signs-of-Homelessness.pdf

Section 3.4 Resources and Tools for Chapter Three

Appendix 3.A Sample Housing Information Form

Chapter Four: Determining Eligibility

In the previous chapter, the discussion focused on legal requirements for liaisons and school districts related to identifying homeless students from a broad perspective, as well as general tips and strategies that the liaison can use to increase student identification. This chapter will also have tips and strategies, but the discussion will move deeper into the topic and examine how to determine the eligibility of individual students.

Section 4.1 Steps to Determining Eligibility

Each student has a unique housing situation; as a result, determinations regarding eligibility and services under McKinney-Vento must be made on a case-by-case basis for each student. At times, making determinations about the homeless status of a student is simple as the student clearly meets the criteria of lacking a fixed, regular, and adequate nighttime residence. Unfortunately, there are also times when it can be difficult to tell if the student's housing situation meets the criteria. Regardless of the ease in identification, the process of determining a student's eligibility involves three basic steps.

1) Gather all the relevant information.
2) Analyze what you know.
3) Seek consultation as needed.

If your district uses a residency questionnaire during enrollment, you may have all the information you need to make a housing status determination by simply looking over the information provided about the student on the form. However, many situations require the liaison to follow up with additional questions about the student's housing to get further clarification. If you need to follow up with a family or unaccompanied youth to ask additional questions, it is important to explain to the family or youth that the purpose for the questions is to determine if the student is eligible for additional educational supports. Considering the nature of the information being requested, some families or students may be hesitant to provide details. As a result, it is also important to have discussions regarding possible

Homelessness is defined as lacking a fixed, regular, and adequate nighttime residence. Situations specifically described in the McKinney-Vento Act include sharing housing due to loss of housing, economic hardship, or a similar reason; living in hotels, motels, trailer parks, or camping grounds due to lack of adequate housing; living in emergency or transitional housing; or children abandoned at hospitals. It also includes a primary nighttime residence that is not designed for or ordinarily used as a sleeping accommodation for humans; living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations; and migratory children living in one of the circumstances described previously. For the full definition, see Appendix 4.A Legal Definition of Homelessness.

homelessness and related services in a location that provides privacy and discretion. Similarly, it is advisable that liaisons avoid using the word homeless as some families do not realize they qualify as homeless or may be embarrassed by the label. Using terms like families in transition or displaced or referring to temporary housing situations can help reduce the stigma experienced by students and their families.

Once you have gathered what seems to be all the relevant information, it is time to put the pieces together and determine if the student lacks a fixed, regular, and adequate nighttime residence. Remember, the student's housing must meet all three criteria to be considered permanently housed. If one or more of the three criteria (fixed, regular, and adequate) is missing, the student would be considered homeless under the McKinney-Vento Act's definition.

While homeless is a term that is defined in the law, the terms fixed, regular, and adequate are not. As you determine a student's eligibility to be considered homeless, it may help to consult definitions offered by standard reference dictionaries, e.g., *Merriam-Webster's Collegiate Dictionary* and *Ballentine's Law Dictionary*. Fixed is defined as "not subject to change or fluctuation" (*Merriam-Webster's Collegiate Dictionary*, Tenth Edition). The term regular is also defined by Merriam-Webster as "normal or standard." *Ballentine's Law Dictionary* further defines it as "consistent," while adequate is described as "fully sufficient and equal to what is required, as well as lawfully and reasonably sufficient" (*Ballentine's Law Dictionary*, Third Edition). In other words, if a housing situation does not clearly fall under one of the categories provided in the definition of homelessness provided in the law, you should consider whether the student can go to the same place every night to sleep in a safe and sufficient space. If not, the student likely meets

the criteria of lacking a fixed, regular, and adequate nighttime residence and should be considered homeless.

Unfortunately, even after gathering good information, talking with parents or guardians, and comparing your notes to the law, it can sometimes still be difficult to tell if a student qualifies as homeless. In that case, you have options to get help making a determination. Just as every public-school district has a liaison for homeless education, every state has a State Coordinator for homeless education. The responsibilities of State Coordinators include providing technical assistance to local liaisons, which means they can be a great resource when trying to make housing status determinations. A directory including State Coordinator contact information is on the NCHE website at https://nche.ed.gov/data/. In addition to contacting your State Coordinator for insight, liaisons can contact the NCHE helpline at (800) 308-2145 or homeless@serve.org. Another option is to reach out to other local liaisons with whom you have a collaborative relationship. Regardless of which option you choose, connecting with someone else on a confusing case can help ensure that students are appropriately identified and connected to resources. Do keep in mind that while consultation with others can result in benefits like further information or problem solving, it is ultimately the liaison's responsibility to make the determination regarding the student's eligibility.

Section 4.2 Complex Conditions: Doubled-Up

Doubled-up situations are often particularly confusing when making housing determinations because it can be difficult to discern fixed housing from temporary. The law refers to this category of homelessness as "sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason" [42 U.S.C. § 11434a(2)(b)(i)]. Based on data collected by the U.S. Department of Education, this category of nighttime residence is the type experienced by the largest number of students each year (http://profiles.nche.seiservices.com/ConsolidatedStateProfile.aspx).

If the reason the family or youth moved in with a family member or friend is clearly due to loss of housing, it can be easy to determine that the housing fits the category of doubled-up. Similarly, sometimes shared housing is clearly inadequate and therefore easy to identify. However, some situations are less clear as homelessness can last from a few hours to many years and may

involve a variety of circumstances. It is important to keep in mind that the reason for the lost housing is not discussed in the law and can include a wide range of catalysts such as unpaid rent or mortgage payments on the part of the family or landlord, housing covenant violations, fires, natural disasters, and more. Additionally, there is no time limit on homelessness. As long as the student fits the definition of lacking a fixed, regular, and adequate nighttime residence, the student will be eligible for McKinney-Vento services.

If you encounter a confusing shared housing situation, asking some of the following questions may help you determine if the student is eligible for assistance under the McKinney-Vento definition:

- Did the family move in together for mutual benefit or due to a crisis or other precipitating event?
- Is there a plan for the household to remain intact over a long term, or is it a short-term situation?
- If unable to stay where they are, would the family be in a clearly homeless situation or in another apartment or house?
- Does everyone have a bed to sleep in? Is the plumbing and electric service safe? Is the housing otherwise adequate?
- Is the family being added to the lease, or have they signed a lease?

Not all doubled-up situations are homeless according to the law, but they do often provide a feasible option for families when shelters are unavailable or full. In the instance that one family has doubled-up with another, only the family who is temporarily staying in the housing should be considered homeless, with very rare exception. Liaisons should re-evaluate the housing of homeless students prior to the beginning of each school year to verify that the student still lacks fixed, regular, and adequate housing.

Section 4.3 Complex Conditions: Unaccompanied Homeless Youth

Over time, the law has been adjusted through reauthorization to better meet the needs of students experiencing homelessness. One such adjustment includes the insertion of a definition for *unaccompanied youth* in law, along with information about rights specifically for unaccompanied homeless youth. An unaccompanied youth is a youth who is "not in the physical custody of a parent or guardian" [42 U.S.C. § 11434(a)(6)].

When making a determination about McKinney-Vento rights for youth, liaisons must ascertain if the student is both homeless and unaccompanied as the student could be one or both. When working with youth, evaluating the housing status before considering unaccompanied status can make the process less confusing. If the situation is not homeless, the youth is not afforded rights under the McKinney-Vento Act, even if the student is unaccompanied; in this instance, state or local policy will apply.

It is also important to note that the definition discusses physical custody. A parent or guardian could still retain legal custody of a youth, but not have physical custody. More information about the rights of this subpopulation of homeless students will be discussed in Chapter 9: Unaccompanied Homeless Youth.

Section 4.4 Complex Conditions: Substandard Housing

When considering the definition of homelessness, the term adequate is often associated with substandard housing. Substandard housing does not have a definition in federal law or rule. This can lead to frustration on the part of liaisons making eligibility determinations, but it also allows liaisons flexibility to make determinations that reflect regional norms and community standards that would be difficult to capture in a single definition applied to the entire country. One simple consideration for liaisons is to determine if the housing is up to state or local building codes and health and safety codes. If it is not, the housing is probably substandard and any student residing there would likely meet the definition of homeless due to inadequate housing.

Examples of substandard housing could include homes:

- without adequate heat, electricity, or water;
- with unsafe heat sources or electrical service;
- with unsafe conditions, such as holes in flooring;
- with a kitchen or plumbing that is inoperable; or
- condemned by housing or other government authorities.

Inadequate or substandard housing can also refer to conditions that go beyond the structure of the building, such as overcrowding. As you consider if a home is adequate, it may be helpful to ask yourself, "Is this home safe? Does it meet basic needs and provide sufficient space for the individuals living in it?" If the answer is no to any part of those questions, the housing may be inadequate and indicate homeless conditions.

Creating a standard protocol based on your community standards helps ensure consistency in eligibility determinations. If you want to consider the criteria of federal agencies as a guideline in creating your LEA's protocol, see Other Resources at https://nche.ed.gov/determining-eligibility/.

Section 4.5 Complex Conditions: Natural Disasters

Mental health experts consider returning to school a critical step in the healing process for children and youth whose lives have been disrupted by disasters (UCLA, n.d.). Going to school helps these students find the structure, normalcy, and routine that is essential to their health and well-being. Children and youth who are displaced by disasters, like other students in homeless situations, are forced to live in a variety of unstable, temporary arrangements. These arrangements include facilities set up by relief and community agencies, as well as motels, cars, campgrounds, and sharing the housing of others. Students displaced by disasters will generally meet the definition of homelessness in the McKinney-Vento Act.

Section 4.6 Do's and Don'ts for Confirming Eligibility

Determining the eligibility of students as homeless can be a complicated process at times. Having a policy or a set of procedures in place can simplify the process, facilitate the timely enrollment of homeless students, and ensure your district complies with the federal law. This can also help your district avoid using invasive or threatening techniques that are inappropriate or damage the school's relationship with families and the community.

The following list includes strategies to help liaisons confirm the eligibility of students as homeless.

- Do implement the use of a district-wide residency questionnaire.

- Do have parents, youth, or caregivers sign enrollment forms indicating that McKinney-Vento services are offered based on information they have provided about their living situations.
- Do use only school staff trained on the McKinney-Vento Act and homelessness to do home visits.
- Do make visits only when necessary, and explain to the family, youth, and homeowner why the visit is occurring. Assure them that all information will remain confidential and conduct only the minimum investigation necessary to verify the living situation.
- Do collaborate with neighboring school district liaisons.
- Do contact previous schools to determine if the student was identified as homeless while attending that school.
- Do use caller ID to verify when parents or youth call from a hotel, motel, or shelter.
- Do talk with parents and youth about their situations, focusing on basic questions and using care and sensitivity.
- Do work with parents, youth, and caregivers to determine if they are able to provide any documents that could confirm their living situations.

Keeping interactions with families and youth positive and supportive instead of invasive and threatening is essential to keeping homeless students connected to school.

- Don't contact landlords or housing agencies to conduct investigations about a student or family as it violates the Family Educational Rights and Privacy Act (FERPA) and is unlikely to provide useful information.
- Don't conduct surveillance of students or families, such as following them, observing them from outside their residences, or talking to neighbors about their living situations.
- Don't use law enforcement personnel for home visits.
- Don't require documents like eviction notices, utility bills, occupancy permits, or notarized letters from host families.
- Don't force caregivers to obtain legal custody or guardianship. The McKinney-Vento Act requires the immediate enrollment of unaccompanied youth; legal custody or guardianship cannot be prerequisites and are not appropriate in many instances.
- Don't force people into shelters or onto the streets as a prerequisite for McKinney-Vento services.

NCHE has several briefs on the topic of confirming the eligibility of homeless students that can be used to train school staff on the definition of homelessness and appropriate procedures.

Section 4.7 Useful Links

NCHE Issue Brief: ***Confirming Eligibility for McKinney-Vento Services***
https://nche.ed.gov/wp-content/uploads/2018/10/conf-elig.pdf

NCHE Issue Brief: ***Determining Eligibility for Rights and Services***
https://nche.ed.gov/wp-content/uploads/2018/10/det_elig.pdf

NCHE Issue Brief: ***Meeting the Needs of Students Displaced by Disasters: Youth on Their Own***
https://nche.ed.gov/wp-content/uploads/2018/10/csds_youth.pdf

NCHE Issue Brief: ***What School District Administrators Should Know About the Educational Rights of Children Displaced by Disasters***
https://nche.ed.gov/wp-content/uploads/2018/10/csds_admin.pdf

Section 4.8 Resources and Tools for Chapter Four

Appendix 4.A Legal Definition of Homelessness

Chapter Five: Enrolling Homeless Students

Enrolling homeless students is a core concept in the McKinney-Vento Act as the law's purpose is to ensure that every homeless child or youth has equal access to a free, appropriate, public education. The term *enrollment* is a critical part of the law and is defined as, "attending classes and participating fully in school activities" [42 U.S.C. § 11434(a)(1)]. Schools are required to enroll homeless students immediately, even if they have missed application or enrollment deadlines while experiencing homelessness and regardless of what point in the school year a homeless student presents for enrollment.

In addition to enrolling students in the general education program, local liaisons are to ensure that homeless students receive educational and related services for which the families and students are eligible. As a result, homeless students should be enrolled in any program operated by the school that is appropriate for the student's needs, such as the school meals program; services through Title I, Part A; school transportation; and preschool programs administered by the local educational agency. It is important to note that homeless students are eligible for Title I, Part A services even if they are not attending a Title I school [20 U.S.C. § 6315(c)(2)(E)]. Local liaisons also must ensure access to community-based programs such as Head Start (including Early Head Start); other public preschool programs; early intervention services under part C of the Individuals with Disabilities Education Act (IDEA) (20 U.S.C. 1431 et seq.); healthcare, dental, mental health and substance abuse services; and housing services that facilitate school attendance or success. It is appropriate to provide these referrals at the time of enrollment. (See Chapter 7: Transportation for more information and Chapter 16: Related Legislation and Guidance for more information on other school services.). Also, students must be enrolled immediately.

Section 5.1 Documents Required for Enrollment

Students experiencing homelessness often do not have documents or records that are typically required for school enrollment. The McKinney-Vento Act recognizes that students often do not have the usual documentation at the time of enrollment and requires schools to enroll homeless students even if they do not have paperwork normally required. Liaisons or other appointed

staff should follow up with the family and assist them with obtaining school, immunization, or health records needed by the school.

Districts should review and revise enrollment policies to allow for reasonable flexibility regarding enrollment documentation. For example, districts often require "reasonable proof of date of birth" at the time of enrollment. While a birth certificate would obviously meet this need, other options could include medical records that include a date of birth, baptismal records, passports, or other government issued documentation. Additionally, the limited resources of homeless families can make it especially difficult for parents or guardians to make unplanned visits to the school, especially if it requires them to miss work. As a result, to the extent possible, schools should gather all necessary documents, complete required forms, and make appropriate referrals at the time of the initial visit to the school for enrollment.

Section 5.2 Placing Students in Classrooms Without Records

To maximize continuity and minimize disruption, immediate enrollment and appropriate placement decisions require a quick analysis of information available about the student being enrolled. A quick analysis of student needs can start with whatever information is readily on hand. LEAs should request records immediately from the schools that students attended previously. For those students whose records might be unavailable or possibly even damaged or missing due to a natural disaster, it is incumbent upon receiving schools to begin building new student records based on information gathered from parents, students, local district or state-level student databases, and any other reliable sources of student information. While waiting for records to arrive, phone or email conversations with teachers and school counselors may assist liaisons in determining which classroom is an appropriate placement for students. Similarly, doctors, nurses, or psychologists involved in the evaluation and development of an Individualized Education Program (IEP) can also help schools determine the most appropriate classroom placement. Report cards, tests, and homework assignments provided by families or youth can be good sources of information as well.

Sample questions for parents include:

- Do you have any papers from the previous school, such as notes from teachers, homework assignments, tests, progress reports, or any other papers?
- Have you worked with your child on any recent homework

assignments? If so, what were the assignments about?

- What were your child's grades like? What does your child find easy? Difficult?
- Did you ever go to a meeting at school with a lot of teachers, a doctor, or someone from the school district office?
- Did you ever sign any papers that talked about goals for your child or special school services?
- How many students were in your child's classroom?
- How many teachers were in your child's classroom?

Sample questions for students could include:

- What was your school day like at your former school?
- What were you learning in your math/history/science/language class?
- What did you find easy? Difficult?
- What were some of your recent homework assignments? Do you have any old homework assignments, tests, notes from teachers, or other papers from school?
- What was the name of your math/history/science/language class?
- Did you ever spend time alone or in a small group with a different teacher?
- Did you ever spend time alone or in a small group in a different classroom?
- What were your grades like?

Many textbooks have placement tests and chapter or unit pretests. These can often be used quickly and easily by classroom teachers to guide instructional placement decisions. Ultimately, homeless students must be placed into the classes that seem most appropriate at the time of enrollment, with adjustments made later based on new information, if necessary.

Section 5.3 Enrolling Unaccompanied Homeless Youth

Due to the recognition of unaccompanied homeless youths by the McKinney-Vento Act, it is important to note that the absence of a parent or guardian is not sufficient reason to delay or deny enrollment. Unaccompanied homeless youth who are completely on their own or staying with a non-custodial caregiver must be enrolled immediately. Conditional enrollment based on the requirement that an adult obtain legal guardianship or custodianship within a set amount of time directly contradicts the law.

Liaisons are specifically charged with ensuring that unaccompanied homeless youth are aware of the educational and related opportunities available to them. Liaisons should discuss the options for enrollment with unaccompanied youth and ensure they receive assistance with making enrollment decisions, giving priority to the youth's wishes.

Caregiver forms, which outline who can act on behalf of an unaccompanied youth in educational matters, can be very helpful during enrollment and when making educational decisions for the students. As your district develops new forms or revises existing ones, language that creates enrollment barriers or delays should be avoided.

Section 5.4 Other Considerations

In addition to the McKinney-Vento Act, other state and federal laws may dictate the process used to enroll homeless students. For example, the Family Educational Rights and Privacy Act (FERPA) outlines to whom records can be released and under what conditions, which can be especially important when enrolling students who are survivors of domestic violence. FERPA does allow for the transfer of records from one local educational agency (LEA) to another without parental consent, as long as the LEA has made a reasonable attempt to notify the parent of the disclosure or includes in the district's annual FERPA notification to parents that school records will be forwarded to enrolling schools. This allows districts to easily get records needed for unaccompanied homeless youth.

IDEA contains specific timelines that begin as soon as students with disabilities enroll; working with the district's special education department can ensure a smooth transition for homeless students who have disabilities.

Along with working with other laws and policies, local liaisons also often need to work closely with local truancy officers or state attendance officers and may want to consult with them regarding state compulsory education law, state mandated caregiver forms, and other similar issues.

Unfortunately, some students will present themselves for enrollment at a point during the semester or school year at which it would be impossible for students to accrue credits for classes under normal circumstances. In this instance, schools must still allow the student to enroll in and attend school and participate in school activities. Meanwhile, local liaisons must ensure students receive appropriate credit for full or partial coursework satisfactorily completed while attending a prior school. That could include providing partial credits for completed work, providing mastery-based credits, using credit recovery programs, chunking credits, or possibly using summer school opportunities to make up for lost school time.

Section 5.5 Useful Links

NCHE Issue Brief: ***Enrollment***
https://nche.ed.gov/wp-content/uploads/2018/10/enrollment.pdf

NCHE Issue Brief: ***When Legal Guardians are not Present: Enrolling Students on Their Own***
https://nche.ed.gov/wp-content/uploads/2018/10/guardianship.pdf

Chapter Six: School Selection

The issue of school selection may come up when a homeless student is initially enrolling in a school, but it may also come up for a student recently identified as homeless who is already attending a particular school. According to the McKinney-Vento Act, students have the following school selection options:

- The school of origin or
- The school that non-homeless students who live in the attendance area are eligible to attend [42 U.S.C. § 11432(g)(3)(A)].

The *school of origin* is defined as "the school that a child or youth attended when permanently housed or the school in which the child or youth was last enrolled, including a preschool." [42 U.S.C. § 11432(g)(3)(I)(i)]. The law also states, "When the child or youth completes the final grade level served by the school of origin, the term 'school of origin' shall include the designated receiving school at the next grade level for all feeder schools" [42 U.S.C. § 11432(g)(3)(I)(ii)].

The duration of homelessness that a family or unaccompanied youth experiences may be brief, or it may last a long time. As a result of this variability, the law also addresses how long a student is eligible to attend the school of origin. A homeless student may attend a school of origin for the entire duration of the homelessness or until the end of any school year in which the student becomes permanently housed. Students who become homeless over the summer may also remain in their school of origin for the upcoming school year [42 U.S.C. § 11432(g)(3)(A)(i)].

Section 6.1 Best Interest

The task of choosing which school a student should attend can sometimes be a daunting one. Regardless of the ultimate choice, the best interest of the student is the determining factor for decisions about school placement.

Under the McKinney-Vento Act, in determining the best interest of the homeless child or youth regarding school selection, the LEA must:

i. presume that keeping the child or youth in the school of origin is in the child's or youth's best interest, except when doing so is contrary to the request of the child's or youth's parent, guardian, or (in the case of an unaccompanied youth) the youth;
ii. consider student-centered factors related to the child's or youth's best interest, including factors related to the impact of mobility on achievement, education, health, and safety of homeless children and youth, giving priority to the request of the child's or youth's parent or guardian or (in the case of an unaccompanied youth) the youth;
iii. if, after conducting the best interest determination based on consideration of the presumption in clause (i) and the student-centered factors in clause (ii), the LEA determines that it is not in the child's or youth's best interest to attend the school of origin or the school requested by the parent or guardian, or (in the case of an unaccompanied youth) the youth, the LEA must provide the child's or youth's parent or guardian or the unaccompanied youth with a written explanation of the reasons for its determination, in a manner and form understandable to such parent, guardian, or unaccompanied youth, including information regarding the right to appeal; and
iv. in the case of an unaccompanied youth, ensure that the LEA liaison assists in the placement or enrollment decisions, gives priority to the views of the unaccompanied youth, and provides notice of the right to appeal [42 U.S.C. § 11432(g)(3)(B)].

Frequent school changes can cause educational disruption and additional stress for a student experiencing homelessness that result in many homeless students performing poorly, falling behind in school, and dropping out. A student should always be kept in the school of origin, unless doing so (1) directly contradicts the desires of the parent, guardian, or unaccompanied youth or (2) would negatively impact the student's achievement, education, health, or safety. Allowing a homeless student to remain in the school of origin may reduce the potential harm to his or her educational outcomes. However, the school selection conversation should always be student-centered, considering the unique factors of each student's situation. Remaining in the school of origin may not always be in the best interest of a student. For example, length of a commute for a very young child, more appropriate academic options, or different extracurricular activities could indicate that the local attendance area school would be a better choice for school selection.

All decisions about school placement must be made on a case-by-case basis given the myriad of variables involved. Good questions to consider include:

1. How permanent does the family's current living arrangement appear to be?
2. How deep are the student's ties to the current school?
3. How anxious is the student about an upcoming or recent move?
4. How strong is the student academically?
5. How do the programs and activities at the local school compare to those at the school of origin?
6. Does one school have programs and activities that better address the unique needs or interests of the student?
7. Would the timing of the school transfer coincide with a logical juncture, such as after testing, after an event significant to the student, or at the end of the school year?
8. How would the length of the commute to and from the school of origin impact the student's education?
9. Are there any safety issues to consider?

A checklist of issues to consider may help liaisons guide the discussion on selecting the school in the student's best interest. Appendix 6.A is a sample checklist that can be adapted to fit your district's needs. If a district has large numbers of homeless students, it may be beneficial to train several staff members to assist parents, guardians, and unaccompanied youth in this decision-making process.

If a district sends a student to a school other than the school requested by the parent, guardian, or unaccompanied youth, the school must provide a written explanation to the parent, guardian, or unaccompanied youth. The written notice must also include information about how to appeal the decision. More information on the resolution of such disputes will be covered in Chapter 8: Dispute Resolution.

Section 6.2 Additional Considerations

The McKinney-Vento Act requires that district policies and procedures are reviewed regularly to ensure that no barriers to academic engagement and success exist for homeless students. As a part of your district review, it is advisable to examine your process for making best interest determinations. For example, over time, bus routes or schedules may change, creating

challenges for getting homeless students to their school of origin on time. LEAs must also remove barriers that would prevent homeless youth from receiving appropriate credit for full or partial coursework satisfactorily completed while attending a previous school [42 U.S.C. § 11432(g)(1)(F)(ii)]. In addition, LEAs must remove any barriers to enrollment and retention of homeless students due to outstanding fees or fines, or absences [42 U.S.C. § 11432(g)(1)(I)].

If the LEA determines that remaining in the school of origin is in the best interest of a homeless student, the local liaison should follow up to ensure that transportation to and from the school of origin is arranged expeditiously and the student is linked to all supports afforded to homeless students, such as free meals and academic support, in order to maintain the student's educational stability.

If enrolling in a new school is in the best interest of the student, many simple things can be done to minimize the negative impact of the change, while maximizing student resiliency. If possible, arrange a school transfer at a time where there is a natural break, such as at the end of the school year or at the end of a grading period.

Liaisons in a sending school should ensure that schools send a student's records immediately to the new school, without any delays or barriers caused by outstanding fees, fines, or absences and encourage schools to send samples of the student's work to the new school. The local liaison may want to contact the liaison in the receiving school district to ensure that the student is immediately enrolled and to discuss what services the student may need.

Liaisons in a receiving school should encourage teachers and principals to:

- take time to talk to and welcome students individually;
- use a get-to-know-you questionnaire or journal assignment;
- give a "welcome gift" (school supplies, school clothes, etc.);
- introduce new students to the class;
- identify faculty and peer mentors or buddies;
- provide a short, simple written list of classroom rules and procedures;
- make sure the students are offered the opportunity to have a class job or role and to participate in extracurricular activities;

- have school personnel meet with parents and students when registering;
- create an orientation video for parents, service providers, and students;
- create a file and a portfolio of class work for students to take when leaving the school;
- establish school and classroom-level routines for incoming and departing transfers; and
- identify concrete ways to enable high school students to obtain credit even if they transfer to another school mid-semester.

In addition to removing barriers and smoothing transitions, local liaisons should note whether their state or local policies allow school enrollment options beyond the school of origin and local attendance area school. Many LEAs have open enrollment policies that offer additional options for school selection. Alternative education programs or charter schools may be available and meet a homeless student's needs. Furthermore, some homeless students with disabilities may need an alternative placement due to their Individualized Education Program. Liaisons should work with the program coordinators for these other programs or schools to ensure appropriate enrollment in the student's best interest. See Chapter 11: Collaboration for information on working with other programs.

Section 6.3 Useful Links

NCHE Issue Brief: *School Selection*
https://nche.ed.gov/wp-content/uploads/2018/10/school_selection.pdf

NCHE Issue Brief: *Guiding the Discussion on School Selection*
https://nche.ed.gov/wp-content/uploads/2018/10/sch_sel_checklist.pdf

Recommended Practices for Elementary Teachers of At-Risk and Highly Mobile Students
https://nche.ed.gov/wp-content/uploads/2018/11/eff_teach_elem.pdf

Classrooms with Revolving Doors: Recommended Practices for Middle Level and High School Teachers of At-Risk and Highly Mobile Students
https://nche.ed.gov/wp-content/uploads/2018/11/eff_teach_mh.pdf

NCHE Issue Brief: *Maximizing Credit Accrual and Recovery for Homeless Students*
https://nche.ed.gov/wp-content/uploads/2019/01/Maximizing-Credit-Accrual.pdf

Section 6.4 Resources and Tools for Chapter Six

Appendix 6.A School Selection Checklist for Decision Making

Chapter Seven: Transportation

Section 7.1 The Importance of Transportation for Homeless Students

Transportation is one of the biggest barriers to regular school attendance and school stability for homeless students. While many local educational agencies (LEAs) struggle to meet the McKinney-Vento requirements for transporting homeless students, the importance of enabling homeless students to continue in their school of origin or to participate fully in school without being hampered by the lack of transportation cannot be overestimated.

Section 7.2 School of Origin Transportation Requirements

The McKinney-Vento Act requires every state and its LEAs to adopt policies and practices to ensure that transportation is provided at the request of the parent or guardian (or in the case of an unaccompanied youth, the liaison), to and from the school of origin in accordance with the following, as applicable. If the homeless child or youth:

1) continues to live in the area served by the LEA in which the school of origin is located, transportation to and from the school of origin shall be provided or arranged by the LEA in which the school of origin is located [42 U.S.C. § 11432(g)(1)(J)(iii)(I)].
2) begins living in an area served by another LEA but remains enrolled in the school of origin, the LEA of origin and the LEA in which the homeless child or youth is living shall agree upon a method to apportion the responsibility and costs for providing the child with transportation to and from the school of origin. If the LEAs are unable to agree upon such method, the responsibility and costs for transportation shall be shared equally [42 U.S.C. § 11432(g)(1)(J)(iii)].

The law requires LEAs to coordinate inter-district activities with other LEAs, specifically mentioning the coordination of transportation [42 U.S.C. §

11432(g)(5)(A)(ii)]. It is important to note that this requirement applies to all LEAs whether or not they receive subgrant funds and whether or not they provide transportation to other students.

Homeless children and youth have the right to remain in their school of origin for the duration of homelessness, in any case in which a family becomes homeless between academic years or during the academic year, and for the remainder of the academic year, if the child or youth becomes permanently housed during an academic year [42 U.S.C. § 11432(g)(3)(A)].

Related to transportation, "The State and its LEAs in the State will adopt policies and practices to ensure that transportation is provided, at the request of the parent or guardian (or in the case of an unaccompanied youth, the liaison), to and from the school of origin" [42 U.S.C. § 11432(g)(1)(J)(iii)].

Liaisons must ensure that "…the parent or guardian of a homeless child or youth, and any unaccompanied youth, is fully informed of all transportation services, including transportation to the school of origin…and is assisted in accessing transportation to the school that is selected…" [42 U.S.C. §.11432(g)(6)(A)(viii)].

Section 7.3 Best Interest for School Selection and Transportation to the School of Origin

In determining which school (local attendance area school or school of origin) is in the best interest of a homeless child or youth to attend the LEA shall:

i. presume that keeping the child or youth in the school of origin is in the child's or youth's best interest, except when doing so is contrary to the request of the child's or youth's parent or guardian or (in the case of an unaccompanied youth) the youth; and
ii. consider student-centered factors related to the child's or youth's best interest, including factors related to the impact of mobility on achievement, education, health, and safety of homeless children and youths, giving priority to the request of the child's or youth's parent or guardian or (in the case of an unaccompanied youth) the youth [42 U.S.C. § 11432(g)(3)(B)].

Note that the focus of the best interest determination is on the child or youth. Therefore, the distance or time of a commute is a consideration only as it

impacts the achievement, education, health, and safety of the child or youth. Once the local liaison and parents agree that remaining in the school of origin is in the best interest of the child, the school district must provide or arrange transportation to and from the school of origin, if requested. An LEA may not refuse to provide transportation to the school of origin due to lack of an available bus or other resources once this best interest determination has been made.

Section 7.4 Determining the Mode of Transportation

The LEA ultimately determines the mode of transportation; however, it is important to ensure that the mode of transportation does not create barriers to a homeless student's education (U.S. Department of Education, 2018, p. 27).

For example, transportation arrangements should ensure that a homeless student is able to participate for the full school day, neither arriving late nor leaving before the school day has ended. Extremely early pick-up times or public bus transfers for young children may be problematic and should be considered carefully when arranging transportation.

The mode of transportation also should not stigmatize a homeless student or betray the confidentiality of his or her living status. Bus routes, should be arranged such that students staying in homeless shelters can be picked up and dropped off in a way that does not reveal their place of temporary residence. For example, buses can make a stop at the shelter the first stop in the morning and the last stop in the afternoon.

School districts in urban areas are often able to arrange discounts for homeless students to utilize public transportation. If this option is available, you should make sure that the student is mature enough to manage riding a city bus or arrange for the parent to ride the bus with the child. When the method of transportation chosen by the district is public and the child is too young to travel alone, the district must provide transportation for the parent to and from the temporary residence when needed.

If parents or unaccompanied homeless youth have working automobiles, many school districts will arrange for the parents to drive their children to school (or for an unaccompanied homeless youth to drive). The LEA may provide a gas card or voucher for the parent or youth or provide mileage

reimbursement. It is important to ensure that the amount provided to pay for gas is spent only on transportation to and from school. Some LEAs provide "gas only" vouchers for a specific gas station. The LEA should also note days when the student is not in attendance and adjust the amount accordingly.

Safety policies are another consideration for determining the most logical mode of transportation. The McKinney-Vento Act does not override state educational agency (SEA) and LEA safety policies. If, for example, a state or district policy allows students to travel only on a yellow school bus, then the LEA must arrange bus transportation for homeless students. Provided that students are allowed to be transported in cars or taxis, local liaisons should consult with the school district attorney regarding liability and requirements for background checks for the drivers.

In addition, the local liaison should consult with the State Coordinator about any other state policies or practices related to transporting homeless students.

Section 7.5 Comparable Services

Homeless students have the right to services comparable to those offered to other students, including transportation [42 U.S.C. §11432(g)(4)(A)]. For example, transportation during optional summer school is required for a homeless student if it is provided to nonhomeless students.

Section 7.6 Reviewing and Revising Policies to Remove Educational Barriers

The McKinney-Vento Act states that SEAs and LEAs are responsible for reviewing and revising ANY policies that may act as barriers to the identification OR enrollment of homeless children and youths in school [42 U.S.C. §11432(g)(7)]. Transportation policies are included, as a lack of transportation can be a considerable barrier for homeless students. Because homeless students often experience challenges not faced by housed students, the provision of services to homeless students may need to extend beyond what is provided to regularly housed students.

LEAs must arrange transportation without delay to meet the McKinney-Vento Act's requirement that homeless students are provided immediate

school enrollment, defined as "attending classes and participating fully in school activities" [42 U.S.C. § 11434a(1)]. This may require an interim transportation arrangement until a bus route or other suitable transportation is established.

Section 7.7 Funding Resources

The following are available options to provide transportation services to homeless students.

LEA Transportation Funds or General Funds
Providing transportation for homeless students to and from the school of origin when requested is an LEA responsibility mandated in the McKinney-Vento Act. This responsibility exists for all LEAs, even when an LEA may not provide transportation for other students. As such, most districts rely on state transportation or general funds to provide homeless students with school transportation.

McKinney-Vento Subgrant Funds
The McKinney-Vento Act states that LEAs with subgrants may utilize subgrant funds to cover "the excess cost of transportation" [42 U.S.C. § 11433(d)(5)]. While the law does not define this phrase, the expectation is that the LEA will cover the same level of cost for transporting homeless students as other students, before relying on subgrant funds.

Those LEAs that choose to use McKinney-Vento subgrant funds for the excess cost of transporting homeless students need to include a justification for the expenditures based on their applications' needs assessments (C.F.R. Title 34, Section 75.730). Keep in mind that subgrants are intended to meet a range of needs for homeless students, not just transportation needs. Your State Coordinator can answer questions about the McKinney-Vento subgrant application process and allowable expenses in your state.

Title I, Part A and Transportation for Homeless Students
Funds reserved for homeless students under Title I, Part A (set-aside funds) may be used to provide homeless children and youths with services not ordinarily provided to other students, including providing transportation to and from the school of origin [20 U.S.C. § 6313(c)(3)(C)(ii)]. Liaisons should coordinate with their Title I directors to assess the needs of homeless

students and determine what transportation needs can be met with the Title I, Part A reservation for homeless students.

Title I, Part A set-aside funds for homeless students may be used for other transportation needs for homeless students, such as transportation to enable a homeless student to participate in an educational activity after school if transportation is not otherwise available. Title I, Part A set-aside funds also may be used to provide transportation to enable parents to be more involved in their child's education. See Section 7.12 Links to Resources for the NCHE brief entitled *Serving Students Experiencing Homelessness under Title I, Part A* for more information.

Section 7.8 Collaboration within the LEA

The local liaison, LEA pupil transportation director, and other LEA administrators should work together to develop effective transportation policies and procedures. (See Chapter 15: Managing the Work for more information on developing protocols for the LEA.). With ongoing communication and a clear delineation of responsibilities, LEAs can ensure that homeless students are provided needed transportation in an efficient and timely way, and ensure all relevant parties are in the loop regarding what transportation is needed and what the most appropriate modes of transportation are.

Many districts utilize special education buses for transporting homeless students. The U. S. Department of Education's Office of Special Education Programs (OSEP) allows the use of designated special education buses for transporting homeless students as long as the transportation needs of all special education students have been met. See Section 7.12 Links to Resources for a link to an August 2013 OSEP Dear Colleague Letter that supports this use of special education buses.

All parties involved in student transportation should be familiar with the McKinney-Vento Act. This includes bus drivers, because they are often the first and last school personnel to come in contact with students experiencing homelessness over the course of a day; as a result, they may develop supportive relationships with the students. Drivers may assist with identifying students in homeless situations too, as they observe changes in when and where students are picked up or dropped off.

Section 7.9 Collaboration with other LEAs

When LEAs are arranging transportation across school district lines, the school personnel of all LEAs involved should discuss the mode of transportation for each student prior to initiating the transportation. Agreeing upon general guidelines for sharing the responsibility and cost of transporting homeless students among LEAs ahead of time eliminates confusion and conflicts when transportation needs to be arranged immediately for a homeless student. Some LEAs establish memoranda of agreement, while others have less formal agreements. Liaisons and pupil transportation directors should review these agreements annually and revise as needed.

Some effective collaboration practices include:

- convening a regional joint McKinney-Vento training that includes pupil transportation directors, local liaisons, social workers, and bus drivers;
- convening an annual regional meeting of local liaisons and pupil transportation directors to discuss procedures for arranging transportation for homeless students and to address collaboration challenges;
- identifying a pupil transportation staff person whose primary responsibility is to arrange transportation for homeless students; and
- establishing an electronic database for homeless students needing and receiving transportation, allowing liaisons and the pupil transportation department to immediately access current transportation commitments.

The McKinney-Vento dispute resolution process only applies when there is a disagreement between the school and the parent, guardian, or unaccompanied youth related to eligibility, school selection, or enrollment. Most disagreements between LEAs over transportation can be prevented through good communication and efforts to agree upon transportation arrangements. When an interdistrict disagreement about transportation services occurs, it should be resolved at the SEA level. During a dispute, the child or youth must be immediately enrolled in the school in which enrollment is sought pending final resolution of the dispute including all

available appeals [42 U.S.C. §11432(g)(3)(E)(i)], and provided all services, including transportation as specified in the law.

Section 7.10 Community Collaborations

Local liaisons should establish cooperative relationships with community agencies that serve homeless families, youth, and children. A community-wide commitment to assist homeless families with children and unaccompanied homeless youth can result in resource sharing, including transportation resources. Many LEAs have been able to arrange transportation using shelter or other social service agency vans. Some public transportation systems donate bus passes or other transportation services to school districts for use by homeless students. Community or school district foundations are often willing to contribute to meeting the transportation needs of homeless students as well. Collaboration with housing providers can also reduce transportation costs by encouraging housing partners to consider school proximity when making shelter or other housing placements.

Section 7.11 Working with Parents

Parents who are experiencing homelessness generally appreciate being included in decisions involving the education of their children and should be part of the conversation on developing any plans for transporting their children to and from the school of origin. Moreover, parents should be provided with clear expectations for their role in carrying out the plan, such as committing to getting their children to a bus stop on time, notifying the transportation department when a child will not be attending school to avoid unnecessary trips, or following procedures for utilizing gas vouchers. A written agreement that spells out the LEA's and the parent's responsibilities is useful in holding all parties accountable. Appendix 7.A provides a sample transportation memorandum of understanding between an LEA and homeless parents that can be adjusted to meet the needs of an LEA.

Section 7.12 Links to Resources

NCHE Issue Brief: *Transporting Children and Youth Experiencing Homelessness*
https://nche.ed.gov/wp-content/uploads/2019/01/transportation.pdf

NCHE Issue Brief: ***Serving Students Experiencing Homelessness Under Title I, Part A***
https://nche.ed.gov/wp-content/uploads/2018/10/titlei.pdf

Dear Colleague Letter: Office of Special Education Services
August 2013
https://nche.ed.gov/wp-content/uploads/2018/10/osers-colleague-ltr-aug-2013.pdf

Tip Sheet: ***Transportation for Homeless Children and Youth: Strategies for Rural School Districts***
https://nche.ed.gov/wp-content/uploads/2018/11/rur_trans.pdf

National Center for Homeless Education Website Resources by Topic: Transportation (includes sample forms and materials including interdistrict and parent agreements)
https://nche.ed.gov/transportation/

U.S. Department of Education
Education for Homeless Children and Youths Program Non-Regulatory Guidance
https://www2.ed.gov/policy/elsec/leg/essa/160240ehcyguidanceupdated082718.docx

Section 7.13 Resources and Tools for Chapter Seven

Appendix 7.A Transportation Memorandum of Understanding

Chapter Eight: Dispute Resolution

8.1 Purpose of Dispute Resolution Policy

Parents, guardians, or unaccompanied youths experiencing homelessness may disagree with schools or school districts on issues related to eligibility for McKinney-Vento services, school enrollment, and school selection. In most cases, parties can resolve these issues before entering into a formal dispute; however, there are times when an informal resolution is not possible and the intervention of an objective third party must be pursued.

Formal dispute resolution

- ensures that each party's views are represented,
- enables the facts of the case to be considered objectively, and
- allows students to attend school while bringing the disagreement to closure.

While few people enjoy conflict, a dispute resolution process is an important tool to protect the rights and best interests of homeless children and youths, as well as those of the local educational agency (LEA). Therefore, the McKinney-Vento Act requires each State educational agency (SEA) to include a written procedure for the prompt resolution of disputes in its state plan for homeless education [42 U.S.C. § 11432(g)(1)(C)].

In addition, SEAs are required to have a McKinney-Vento dispute resolution process in place [42 U.S.C. §11432(g)(1)(C)]. While each district is allowed to design its own process as long as basic requirements are included, it is important for LEA dispute policies to align with the state dispute resolution policy. This allows parents, guardians, unaccompanied homeless youth, and district personnel to clearly understand the terms, expectations, and process whether the dispute is settled at the local or state level. Moreover, it is good practice to have a written dispute resolution policy for homeless education at the LEA level that reinforces the state dispute resolution policy to facilitate efficient and expedient resolutions to disputes.

8.2 What the McKinney-Vento Act Requires

When a dispute arises over eligibility, school selection, or enrollment in a school, the law requires the following minimum procedures:

1. The child or youth "shall be immediately enrolled in the school in which enrollment is sought, pending final resolution of the dispute, including all available appeals" [42 U.S.C. § 11432(g)(3)(E)(i)]. In the case of an unaccompanied youth, the local liaison also must ensure that the youth is immediately enrolled in the school in which the youth seeks enrollment pending the resolution of the dispute [42 U.S.C. § 11432(g)(3)(E)(iv)]. While disputes are pending, students have the right to participate fully in school and receive all services that they would normally receive, as the definition of enrollment includes "attending classes and participating fully in school activities" [42 U.S.C. § 11434a(1)].

2. The parent, guardian, or unaccompanied youth must be provided with a written explanation of any decisions related to school selection or enrollment made by the school, the LEA, or the SEA involved, including the rights of the parent, guardian, or unaccompanied youth to appeal such decisions [42 U.S.C. § 11432(g)(3)(E)(ii)]. The LEA must provide a written explanation of the reasons for its determination, in a manner and form understandable to the parent, guardian, or unaccompanied youth, including information regarding the right to appeal [42 U.S.C. § 11432(g)(3)(B)(iii)]. In the case of an unaccompanied homeless youth, the notice explaining the decision and the right to appeal are provided directly to the youth [42 U.S.C. § 11432(g)(3)(B)(iv)].

3. The parent, guardian, or unaccompanied youth must be referred to the local liaison, who will carry out the dispute resolution process as expeditiously as possible [42 U.S.C. § 11432(g)(3)(E)(iii)]. The local liaison must be familiar with the state's McKinney-Vento dispute resolution policy, and follow all procedures outlined therein.

8.3 Common Topics for McKinney-Vento Disputes

The McKinney-Vento Act mandates basic protections and procedures to

follow when a dispute arises "over eligibility, or school selection or enrollment in a school" [42 U.S.C. § 11432(g)(3)(E)]. Therefore, the protections and procedures must be available to address any dispute about whether a student has the right to enroll in a particular school, whether based on eligibility, best interest, school selection, or immediate enrollment. The law also defines enrollment as "attending classes and participating fully in school activities" [42 U.S.C. § 11434a(1)]. Therefore, McKinney-Vento dispute procedures apply to any dispute arising under the Act, including disputes over questions such as:

Eligibility
Does the child or youth requesting enrollment meet the definition of homeless such that immediate enrollment is required, regardless of missing school records, proof of residency, immunization and other required health records, lack of a parent or guardian, or other documentation?

School Selection
Is it in the child's or youth's best interest to continue attending the school of origin or to enroll in the local attendance area school? Does the parent's, guardian's, or unaccompanied youth's preference conflict with the school's or LEA's determination of best interest?

Participation
Is the child or youth attending classes immediately, even if the school has not yet received school records, including special education records, immunization or other required health documents? Is the student provided full participation in school activities? Is enrollment granted immediately in any public school that non-homeless students who reside in the same area as the homeless child or youth are eligible to attend?

Transportation
Is the school district required to provide transportation to a student in a particular situation? Does the transportation provided permit the child to attend classes and participate fully in school activities?

In some instances, a parent, guardian, or unaccompanied youth experiencing homelessness may disagree with the LEA on an issue that does not fall under the McKinney-Vento Act. For example, a parent, guardian, or youth may disagree on an issue more appropriately addressed through the special

education program, or the conflict may center on a desire to attend a school other than the local attendance area school or school of origin. In these cases, the local liaison should help the parent, guardian, or unaccompanied youth understand the scope of the McKinney-Vento Act and connect to other programs and resources that could better address the expressed needs and wishes.

Nevertheless, if the decision is related to eligibility, school selection, or school enrollment, the LEA must provide written notice; allow the parent, guardian, or unaccompanied youth to dispute the decision; and provide immediate enrollment in the school in which enrollment is sought pending the resolution of the dispute. While some disagreements may appear to be outside of the scope of the law and not appropriate for the McKinney-Vento dispute resolution process, additional information may surface during the dispute process that is applicable to the law and could put the LEA in a position of non-compliance had it refused to allow the dispute process to go forward and the parent, guardian, or unaccompanied youth complained to the SEA.

Table 8.1 Common Disagreements is a listing of conflicts that regularly occur and either are related to the McKinney-Vento Act or may appear to be McKinney-Vento dispute resolution issues at first glance. Note that these examples are for illustrative purposes only. Actual cases will have nuances not captured in the abbreviated descriptions offered in the table.

Table 8.1 Common Disagreements

Type of Conflict	Examples
McKinney-Vento dispute resolution conflicts	• Disagreement about remaining in school of origin • Disagreement about immediate enrollment in school of residency • Disagreement about homeless status when student was appropriately identified as homeless previously (e.g., doubled-up in same location for two years)

Type of Conflict	Examples
Conflicts not appropriate for dispute resolution, but which are McKinney-Vento compliance issues	• School failed to inform of educational rights under McKinney-Vento • Student is not provided free meals • Systemic non-compliance by an LEA which requires state intervention (e.g., failure to identify homeless students; lack of outreach and coordination within schools and community
Issues which do not indicate McKinney-Vento compliance, but address services which are allowable or beneficial	• Additional activities could enhance homeless identification (e.g., using a residency questionnaire) • Summer school could improve student's academic performance but is not required to pass a course or grade
Conflicts not related to McKinney-Vento status	• Parent disagrees with the services being offered in an Individualized Education Program • Parent wants child to enroll in a school which is neither the school of origin nor the local attendance area school

8.4 Important Considerations Before, During, and After the Dispute Resolution Process

Attending to details before a dispute occurs, during the dispute process, and after a dispute is resolved will ensure the LEA is prepared to carry out the process in the fairest and most objective manner possible while also reviewing each case for lessons learned to improve the process.

8.4.1 Before a Dispute Occurs

Make sure the LEA dispute process is streamlined and accessible to homeless parents, guardians, and unaccompanied youth. The LEA should have written procedures to ensure that all LEA staff members involved know their responsibilities and ensure barriers to initiating the dispute process are eliminated.

Most parents and unaccompanied youth experiencing homelessness have limited resources, little to no ability to secure attorneys or advocates, and are

dealing with the extreme stressors of homelessness. Parents, guardians, and unaccompanied youth must receive clear and simple information about

- their right to dispute decisions,
- how to initiate the dispute,
- how the process will unfold,
- who in the LEA and SEA they can contact with questions, and;
- the timeline for the process.

Schools must provide this information in writing, but the local liaison should explain the process orally to ensure that parents, guardians, and unaccompanied youths understand.

Parents, guardians, and unaccompanied youth should be able to initiate the dispute resolution process directly at the school they choose or at the local liaison's office. It is important to offer both options as most homeless families and youth struggle with transportation. They may not have a way to travel to a particular office to initiate the dispute process. The need to travel may delay them initiating the dispute, and if timelines are short, the families or unaccompanied youth may be unable to initiate the dispute within the required time frame. To eliminate transportation barriers, parents, guardians, and unaccompanied youth should be provided maximum flexibility to initiate the dispute and submit appeals documents at the most convenient school or district office.

The paperwork necessary to initiate a dispute should be minimal to eliminate barriers to parents, guardians, and unaccompanied youth accessing the process. The written notice, for example, could include a space where the parent, guardian, or unaccompanied youth indicates whether he or she agrees with the decision. Indicating a disagreement should trigger a conversation about the dispute process and an immediate referral to the liaison.

8.4.1.1 Written Notice

Written notice protects both students and schools by outlining the specific reasons for the school's decision. It facilitates the dispute resolution by providing the decision maker with documents to guide their determinations. Written notice should be complete, as brief as possible, simply stated, and

provided in a language the parent, guardian, or unaccompanied youth can understand.

Specifically, written notices should include the following elements:

- contact information for the local liaison and State Coordinator, with a brief description of their roles;
- a simple, detachable form that parents, guardians, or unaccompanied youth can complete and submit to the school to initiate the dispute process (the school should copy the form and return the copy to the parent, guardian, or unaccompanied youth for his or her records when it is submitted);
- a step-by-step description of how to formally dispute the school's decision;
- notice of the right to be immediately enrolled in the school in which enrollment is sought, pending resolution of the dispute and all available appeals, including the right to participate fully in all school activities;
- notice of the right to appeal to the state if the district-level resolution is not satisfactory; and
- timelines for resolving the district-level and state-level appeals (U.S. Department of Education, p. 31-34).

For an example of a form providing written notice, see Appendix 8.A Written Notification of Decision.

8.4.2 During the Dispute

Once a parent, guardian, or unaccompanied youth has initiated a dispute, the LEA is obligated to carry out the dispute process as objectively and quickly as possible. The dispute process allows the LEA and the parent, guardian, or unaccompanied youth (or local liaison on behalf of the youth) to present all case-related facts and documentation to a third party. In some states, the documentation is first reviewed by someone at the LEA level, and then provided at the state level.

It is critical that you are familiar with the process in your state and carry it out as specified. You should have the state dispute resolution policy and the LEA dispute policy on hand to guide you through the process.

8.4.2.1 Getting the Facts: What is Legal and What is Reasonable

When a dispute arises under the McKinney-Vento Act, particularly when regarding eligibility, an LEA may wish to look further into the situation of the family or youth to compile evidence in support of its position. *It is absolutely critical that all such efforts be grounded in sensitivity and respect, keeping the academic well-being and best interest of the child or youth in the forefront.* Invasive or threatening techniques to confirm eligibility or explore the situation of a family or youth violate the McKinney-Vento Act. They also may violate the Family Educational Rights and Privacy Act (FERPA), humiliate families and youth, and put temporary housing arrangements in jeopardy.

For cautions and good practices in obtaining information on families and youth experiencing homelessness, see Section 8.6 Links to Resources for the NCHE issue brief, *Confirming Eligibility for McKinney-Vento Rights and Services.*

To assist with confirming eligibility for McKinney-Vento services, many LEAs have developed residency forms with informative, yet sensitive, questions to help determine eligibility and gather information. See Section 8.6 Links to Resources for sample forms developed for this purpose.

8.4.2.2 Providing Information Relevant to a Dispute

The local liaison should keep thorough documentation of interactions with a parent, guardian, or unaccompanied youth and be prepared to provide this information to the designated third party in an organized fashion.

The following documentation may be reviewed during the dispute process:

- a clear, concise description of the issue (e.g., what the parents, guardians, or unaccompanied youth are disputing, such as why the parent feels the child fits the definition of homeless or should attend a certain school, and why the LEA disagrees);
- a timeline of contacts between the school and the parent, guardian, or unaccompanied youth;
- copies of emails between the school or LEA and the parent, guardian, or unaccompanied youth;

- a log of phone contacts and meetings between the school or LEA and the parent, guardian, or unaccompanied youth;
- a description of what the LEA has done to follow the dispute policy; and
- any written documentation or information the parent, guardian, or unaccompanied youth (or local liaison on behalf of the youth) has provided.

8.4.2.3 Helping Parents, Guardians or Unaccompanied Youth with the Dispute Process

Parents, guardians, and unaccompanied youth often need help to know what information to provide, how to obtain it, and how to present it. If they receive help in providing appropriate information, the case will proceed more efficiently.

Schools and LEAs may inform parents, guardians, and unaccompanied youth that they can seek the assistance of advocates, attorneys, and other service providers with whom they are working. You may wish to provide a list of local attorneys and advocates who have a thorough knowledge of the McKinney-Vento Act and are willing to work with parents or guardians.

Parents, guardians, and unaccompanied youth may have difficulty meeting deadlines. It is important to inform them of deadlines in the dispute process and determine with them if there is a need to be flexible with the deadlines. In the event that parents are unable to write statements to explain their case, the LEA should arrange to obtain their statement orally. Reaching out to parents, guardians, or unaccompanied youth in this way ensures they are not disadvantaged in the dispute process due to logistical challenges or their inexperience with interacting with an organization in a formal way.

Once a decision is rendered on the dispute, the local liaison should ensure that all parties involved are apprised of the decision and arrangements are made to carry it out in the most efficient way possible. In the event that the decision is not made in favor of the parent, guardian, or unaccompanied youth, it is considered a good practice to discuss the decision with this person and develop strategies to implement the outcome, make it as palatable as possible, and to assure him or her that the best interest of the student was kept at the forefront.

8.4.3 After the Dispute

Dispute resolution is usually a complex process, and every case is unique. It is beneficial to debrief each case to determine lessons learned that can be used to improve the process and policy for future disputes. The local liaison is encouraged to review aspects of the process that worked efficiently and what could be improved after each dispute is resolved. Liaisons should discuss needed changes with all LEA and school staff involved, as well as with the State Coordinator.

Appendix 8.B Dispute Resolution Guide is a worksheet to help you review a dispute case and identify what needs to be done differently next time.

8.5 Prevention is the Best Solution

Many disagreements between a parent, guardian, or unaccompanied youth and the LEA can be avoided. Diffusing disagreements through effective communication can eliminate the need for a formal dispute.

Table 8.2 Diffusing Disputes: Issues and Strategies provides a chart of issues that arise, and strategies that, when used to address them appropriately, can diffuse a disagreement.

Table 8.2 Diffusing Disputes: Issues and Strategies

Issue	Strategies
School or LEA is not compliant with implementing the McKinney-Vento Act.	If a school or the LEA is not implementing the McKinney-Vento Act and is creating barriers to the education of homeless children and youths, then parents, guardians, and unaccompanied youth have a legitimate grievance that should be brought to the attention of the local liaison or State Coordinator. To avoid this type of dispute, ensure that all LEA and school staff members are familiar with the McKinney-Vento Act and understand their responsibility to implement it.

Issue	Strategies
A parent, guardian, or unaccompanied youth desires an action or service that is not covered in the McKinney-Vento Act, such as attending a school other than the school of origin or the school in the local attendance area where they are temporarily staying.	The local liaison should explain the law to the parent, guardian, or unaccompanied youth, and provide the provisions of the law to clarify the issue. Referrals to other programs should be made, if appropriate.
A parent, guardian, or unaccompanied youth becomes angry and behaves inappropriately when expressing disagreement.	LEA and school staff should be trained to understand the trauma faced by homeless families and ways to de-escalate trauma responses. (See Chapter 10: Working with Parents for more information.)
A parent, guardian, or unaccompanied youth wants a certain service or outcome and attempts to use a designation of homeless to get it.	When parents, guardians, or unaccompanied youth appear to be "manipulating the system," LEA and school staff should attempt to determine what exactly the parent, guardian, or youth wants and see if there are other programs or ways to provide the service or outcome.
Parents, guardians, or unaccompanied youth feel disrespected by the school or LEA and want the school district to be punished.	Parents, guardians, and unaccompanied youth should be treated with respect at all times. When parents are sent to multiple offices to address an issue, when they are confused about how to get services for their children or what services are available, or when they receive a notice in the mail that their child is going to be disenrolled from school, they are likely to become angry and feel mistreated by the school or LEA. They will want justice and retribution to become part of the dispute. LEA and school staff should have face-to-face conversations with the parent to foster an understanding of the law and process. Oftentimes, direct communication will develop rapport and trust with parents and make them more willing to be a partner in determining what can and cannot be done.
A parent, guardian, or youth brings a lot of grievances to the table, some of which may not be relevant to a McKinney-Vento dispute.	It is important to help the parent, guardian, or youth "keep the main thing the main thing." Be very clear as the dispute process is initiated what issue the dispute will address (e.g., determining eligibility) and what extraneous issues will not be addressed (e.g., a principal who treated a child unfairly). While both are serious grievances, the focus of *your* work is on the issue relevant to the McKinney-Vento Act.

8.6 Links to Resources

NCHE Issue Brief: *Confirming Eligibility for McKinney-Vento Services*
https://nche.ed.gov/wp-content/uploads/2018/10/conf-elig.pdf

NCHE Issue Brief: *Determining Eligibility for McKinney-Veto Services*
https://nche.ed.gov/wp-content/uploads/2018/10/det_elig.pdf

National Center for Homeless Education
Enrolling Children and Youth Experiencing Homelessness in School, Sample Forms
https://nche.ed.gov/enrolling/

NCHE *State Coordinator's Handbook*, Section J, Dispute Resolutions
https://nche.ed.gov/state-coordinators-handbook/

U.S. Department of Education
Education for Homeless Children and Youths Program Non-Regulatory Guidance
https://www2.ed.gov/policy/elsec/leg/essa/160240ehcyguidanceupdated082718.docx

8.7 Resources and Tools for Chapter Eight

Appendix 8.A Written Notification of Decision
Appendix 8.B Dispute Review Guide

Chapter Nine: Unaccompanied Homeless Youth

Section 9.1 Overview

Homelessness is a devastating circumstance for any child or youth, but being both homeless and separated from a parent or guardian often puts youth in inadequate and unsafe living situations and makes them at risk for school failure or dropping out—all of which can compound the effects of trauma for unaccompanied homeless youth. Schools and local educational agencies (LEAs) face numerous challenges in meeting the needs of these youth.

Many barriers can hinder the ability of unaccompanied homeless youth to enroll, attend, and succeed in school. These barriers often include:

- lack of stable housing;
- inability to take care of basic needs resulting in fatigue, poor health, poor hygiene, and hunger;
- lack of school supplies and clothing;
- emotional crises or mental health problems due to experiencing trauma;
- lack of support from a caring adult;
- concern about being reported to child welfare and law enforcement agencies;
- employment that interferes with attendance and school work;
- missing school records and other paperwork;
- lack of transportation;
- irregular school attendance; and
- difficulty accumulating credits due to school mobility.

The local liaison must ensure that these youth are provided services under the McKinney-Vento Act and linked to services within the LEA and the community to meet their needs.

Section 9.2 Definitions: Unaccompanied Youth and Homeless

The McKinney-Vento Act defines an *unaccompanied youth* as "a homeless child or youth not in the physical custody of a parent or guardian" (42 U.S.C. § 11434a(6)). This definition can be used to describe youth who are residing with a caregiver who is not a parent or guardian as well as youth who are living without the care of an adult.

An unaccompanied youth must fit the definitions of both homeless and unaccompanied in the McKinney-Vento Act to receive assistance under the provisions in the law. That is, an unaccompanied youth is a child or youth who is not in the physical custody of a parent or guardian *and* lacks a fixed, regular, and adequate nighttime residence.

> *Only youth who are unaccompanied AND homeless qualify for assistance under the McKinney-Vento Act as unaccompanied youth.*

There are many youth who do not live in the physical custody of a parent or guardian; however, only those who are homeless are eligible for McKinney-Vento services. The flowchart in Appendix 9.A illustrates when an unaccompanied youth may be considered homeless (and eligible for McKinney-Vento services) and when the youth may not be considered homeless.

There is no lower age limit for unaccompanied homeless youth. The upper age limit, as with all McKinney-Vento eligible students, is the upper age limit for public education. The upper limit varies from state to state, but is often 21 to incorporate mandates for public education under the Individuals with Disabilities Education Act (IDEA), which allows youth up to age 21 to receive special education services.

McKinney-Vento eligibility determinations are based on the youth's current living situation, not the circumstances that caused the student to leave home. An unaccompanied homeless youth is eligible for services regardless of whether the student was asked to leave the home or chose to leave due to conditions in the home. While it can be easy to consider the reason a youth left home trivial—that the youth has a perfectly good home or that the youth simply needs to abide by the rules set by the student's parents—there may be other circumstances that warrant the youth being out of the home at this time. Sometimes school staff never know the "rest of the story" as the youth

may not be willing to disclose uncomfortable or embarrassing details. Ultimately, regardless of your understanding of the full details that led to the student being unaccompanied and homeless, your responsibility under the McKinney-Vento Act is to ensure the student has an equal opportunity to attend and succeed in school.

It is important for the local liaison to reinforce in trainings with school staff that the school's primary responsibility is to enroll and educate homeless children and youth in accordance with the McKinney-Vento Act. Judgments regarding why a youth left home fall outside the purview of the public education system. Schools are required to enroll any unaccompanied youth who fits the definition of homeless.

Section 9.3 McKinney-Vento Act Provisions for Unaccompanied Homeless Youth

Unaccompanied homeless youth are ensured the same educational rights that the McKinney-Vento Act provides for other homeless students, which include the right to:

- enroll immediately, even if they do not have paperwork normally required for enrollment or have missed application or enrollment deadlines [42 U.S.C. § 11432(g)(3)(C)(i)];
- attend either the local attendance area school or the school of origin, with the placement decision based on the student's best interest, giving priority to the youth's request [42 U.S.C. § 11432(g)(3)(B)(ii)];
- remain in the school of origin (including the designated receiving school at the next grade level for all feeder schools) for the duration of the homelessness and until the end of the school year in which the student becomes permanently housed [42 U.S.C. § 11432(g)(3)(A)(i), 42 U.S.C. § 11432(g)(3)(I)(ii)].
- receive transportation to and from the school of origin [42 U.S.C. § 11432(g)(1)(J)(iii)];
- receive educational services, such as free school meals and Title I services and participate in gifted and talented programs, vocational and technical education, alternative education, programs for English learners, and any other services comparable to what housed students receive [42 U.S.C. § 11432(g)(4)]; and
- not be stigmatized or segregated on the basis of their status as homeless [42 U.S.C. § 11432(g)(1)(J)(i)].

In addition to the provisions that apply to all homeless students, the McKinney-Vento Act includes the following provisions specifically for unaccompanied homeless youth:

- Unaccompanied homeless youth shall be immediately enrolled without proof of guardianship [42 U.S.C. § 11432(g)(1)(H)(iv)];
- During a dispute over eligibility, school selection, or enrollment, unaccompanied homeless youth shall receive a written statement explaining the school's decision, the youth's right to appeal the decision, and a referral to the local liaison. Students also must be enrolled in school immediately while disputes are resolved [42 U.S.C. § 11432(g)(3)(E)];
- Local liaisons must ensure that unaccompanied homeless youth
    - are immediately enrolled in school;
    - have opportunities to meet the same state academic standards as other children and youth; and
    - are informed of their status as independent students for the purpose of applying for financial aid for higher education and provided verification of such status for the Free Application for Federal Student Aid (FAFSA) [42 U.S.C. § 11432(g)(6)(A)(x)].

Section 9.4 Identifying Unaccompanied Homeless Youth

Identification of unaccompanied homeless youth can be challenging because they often do not readily identify themselves to school personnel. Many youth feel there is stigma related to their situation and avoid telling others about it. Youth are often afraid they will be treated differently by school personnel or by other students if "found out" or that they will be reported to child welfare or law enforcement. It is essential that school personnel be made aware of the specific needs of unaccompanied homeless youth in order to treat youth appropriately.

Some helpful strategies to identify unaccompanied homeless youth include:

- Posting outreach materials where youth congregate, including laundromats, parks, campgrounds, skate parks, youth clubs or organizations, and 24-hour stores.
- Developing outreach materials specifically targeted to homeless youth. (See Section 9.12 Useful Links for youth specific materials that can be obtained through the NCHE website.)
- Using means of communication that are comfortable for youth, such

as websites, email, texts, the school district Facebook page, Twitter, Instagram, or Snapchat.

- Enlisting other students to help spread the word about services offered to homeless youth.
- Making the school a welcoming and supportive place for youth.
- Building trusting relationships with unaccompanied homeless youth.
- Informing youth of their rights under the McKinney-Vento Act. Conducting conversations with youth in an office or other area that allows for confidentiality.
- Listening to their concerns and wishes; withholding judgment.
- Keeping in mind the challenges these students are facing as you work with them, offer support as you are able; sometimes, youth perceive providing a small packet of school supplies or hygiene items as a caring gesture.
- Encouraging unaccompanied homeless youth to stay in school and advocating for their educational success.
- Informing youth in advance about the circumstances under which you may be required to alert child welfare or law enforcement and helping youth understand how this process may affect them.
- Sharing NCHE's Unaccompanied Youth Eligibility Flowchart (Appendix 9.A) with enrollment staff.

Section 9.5 Enrolling Without Parents or Guardians

The McKinney-Vento Act requires that schools enroll unaccompanied homeless youth immediately, even without a parent or guardian, and remove any barriers to enrollment. Because the McKinney-Vento Act is a federal law, the immediate enrollment provision overrides any local policies that may be a barrier to enrolling unaccompanied homeless youth. There are three common methods for enrolling unaccompanied homeless students:

- students enroll themselves;
- caregivers enroll students; or
- local liaisons enroll students.

To meet the requirement of removing barriers for enrollment and attendance, schools should develop policies for enrolling a youth without a parent or guardian.

Despite the absence of parents or guardians for unaccompanied youth, schools will still be able to acquire student records, as parent or guardian consent is not required in order to transfer student records to an enrolling school, according to the Family Education Rights and Privacy Act (FERPA). (See 9.12 Useful Links for more information on FERPA.)

A school district cannot require a caregiver to obtain legal guardianship at any point prior to or following an unaccompanied homeless student's enrollment. A school district also cannot discontinue a student's enrollment due to an inability to identify a caregiver, guardian, or parent following enrollment or an inability to produce guardianship or other paperwork.

The following strategies may assist liaisons helping unaccompanied homeless youth obtain missing health and related records:

- Birth certificates can be ordered online through state departments of health. Requests for birth records should be submitted to the state in which the student was born. For information on where to obtain vital records in a particular state, visit www.cdc.gov/nchs/w2w.htm.
- An application for original or replacement social security cards can be obtained by visiting www.ssa.gov/ssnumber/. The website also provides information about documents that must be provided with the application as proof of identity.
- Many states now have an online immunization registry that can be accessed by doctors' offices and other approved medical providers. This can make it easier to obtain immunization records for highly mobile students who may have limited ability to obtain medical records from another county or state. The following link provides helpful information about where to find missing immunization records: www.cdc.gov/vaccines/recs/immuniz-records.htm#where.
- Unaccompanied homeless youth who need to request a copy of their birth certificate, social security card, or other government-issued record may not have a stable address to which the records can be sent. Allowing the student to use the school address can expedite the process of obtaining original or certified copies for the student.

In addition to policies and procedures regarding unaccompanied homeless youth at the time of enrollment, LEAs should address other potential barriers to full participation in school, including determining who can sign for excused absences and field trip participation and how to consent to medical services. Liaisons should be familiar with state and local laws and policies related to minor medical consent. Your State Coordinator should be able to provide you with sources for this critical information.

Section 9.6 Understanding State and Local Laws and Policies for Reporting Unaccompanied Homeless Youth

States and localities across the nation have a variety of laws and policies related to youth on their own. These laws and policies specify under what circumstances youth must be reported to child welfare or law enforcement. While all states require school staff and social workers to report abuse, most do not require that runaway youth be reported.

Contact your State Coordinator about your state's requirements and to discuss recommendations for how to implement these laws and policies in ways that will be least likely to cause the youth to avoid self-disclosure or to drop out of school. The ultimate goal is to keep youth in school where adults can be available to guide them and link them with services. Unaccompanied homeless youth often do not have anywhere to go when not at school, which leaves them on the street and at risk for life threatening situations such as human trafficking.

In states where reporting runaway youth is mandatory, some LEAs work with local law enforcement and child welfare agencies to agree upon a window of time before the LEA must report runaway youth and the procedures to do so. During this period, more information can be gathered about a youth's circumstances to determine what may be in the student's best interest.

Section 9.7 In-school Support for Unaccompanied Homeless Youth

Unaccompanied homeless youth often have unique barriers to their education that derive from not having stable housing, basic needs, or adult guidance. Accumulating enough credits to graduate can be very difficult for mobile students due to the variety of class offerings/requirements, methods of calculating credits, and graduation requirements across school districts. When students transfer, LEAs must ensure that homeless students receive credit for full and partial coursework completed in the prior school [42 U.S.C. § 11432(g)(1)(F)(ii)].

Consider the following strategies to stabilize students and help them succeed in school.

- Identify the basic needs that are not met for food, clothing, and housing and provide referrals for assistance.
- Provide access to the school athletic department for shower and laundry facilities, and storage space for belongings.
- Allow flexible assignment deadlines when necessary to prevent

unaccompanied homeless youth from being penalized for their inability to meet deadlines due to unstable living circumstances.

- Implement policies to assist with accumulating credits toward graduation, such as chunking credits, implementing mastery-based learning, and offering credit recovery programs.
- Consider alternative education programs that allow flexible school hours or have paid work components for youth who need to work for subsistence.
- Link them with an adult who cares about their wellbeing and will check in with the youth on a regular basis. These adults can serve many roles in the school, from administrators to custodians. They must be someone who can relate to the youth and whom the youth trusts.
- Ensure coordination between the McKinney-Vento and special education programs so unaccompanied homeless youth are provided a surrogate parent if needed.

Section 9.8 Handling Disciplinary Situations for Unaccompanied Homeless Youth

The McKinney-Vento Act does not provide immunity from normal school disciplinary guidelines. Homeless students are subject to the same rules as their housed peers. However, when behaviors are directly related to a student's homelessness (such as, in some instances, being tardy or absent), the youth should not be penalized, as the law states that homeless students cannot be stigmatized on the basis of their homelessness.

Local liaisons should be familiar with the educational challenges that unaccompanied homeless youth face and assist them to overcome their challenges. Sometimes, basic assistance is all that is needed, such as providing an alarm clock to prevent tardiness or resources and supplies to complete assignments. Other times, the youth should be connected with community resources for services such as counseling for behaviors that impact the classroom.

Liaisons should become aware of how trauma can impact the behavior of unaccompanied homeless youth and provide trauma-informed interventions. Section 9.12 Useful Links provides a link to a resource from the National Center on Family Homelessness called the *Trauma Informed Organizational Toolkit for Homeless Services*, which may be valuable to liaisons.

Section 9.9 Extracurricular Activities

For many unaccompanied homeless youth, participation in extracurricular activities is a critical way to engage in school and connect with other students. Extracurricular activities help build self-esteem and give students a sense of purpose and accomplishment.

The McKinney-Vento Act defines enrollment as "attending classes and participating fully in school activities" [42 U.S.C. § 11434a(1)]; this includes extracurricular activities offered through the school. The Act charges state educational agencies (SEAs) and LEAs to develop, review, and revise policies to remove barriers to the enrollment and retention of homeless children and youth in schools. As a part of this requirement, schools could waive activity fees and deadlines for participation for homeless children and youth. Local business sponsors and school alumni may help defray activity costs. School-based organizations, such as parent organizations and booster clubs, also often assist with athletic, band, and other expenses.

For more information, review the NCHE brief, *Ensuring Full Participation in Extra-Curricular Activities for Students Experiencing Homelessness*. (See Section 9.12 Useful Links.)

Section 9.10 Linking with Community Resources

Liaisons should become familiar with community resources for unaccompanied homeless youth, including runaway and homeless youth shelters and general resources for housing and shelter, food assistance, transportation, and physical and mental health services. Developing partnerships and coordinating with agencies serving youth to determine eligibility for services and referral processes will streamline the youth's access to services. For example, liaisons may affirm that a homeless child, youth, or family served by the LEA meets the eligibility requirements for a Department of Housing and Urban Development (HUD) program [42 U.S.C. § 11432(g)(6)(D)]. Chapter 11: Collaborations has more information about forging partnerships to benefit homeless students.

Section 9.11 Helping Unaccompanied Homeless Youth Prepare for College

Local liaisons play a key role in ensuring that unaccompanied homeless youth know about opportunities beyond public school and that they are prepared to take the next steps to apply for and enroll in postsecondary education. Liaisons should work with school guidance counselors to ensure students are made aware of their

options after high school, are college-ready, and have the opportunity to participate in college visit days with their peers.

The College Cost Reduction and Access Act (CCRAA) stipulates that unaccompanied youth determined to be homeless by a local liaison, Runaway and Homeless Youth Act funded shelter, HUD program, or college financial aid administrator may apply for federal financial aid as independent students. Liaisons should make sure that these homeless students have the help they need to complete the FAFSA, including informing them of their status as independent students and providing verification of that status. Unaccompanied homeless youth can complete the FAFSA without a parent or guardian's signature, and the parent or guardian's income is not considered when determining an independent student's need for financial aid. See Section 9.12 Useful Links for an NCHE brief related to this topic.

Section 9.12 Useful Links

College Cost Reduction and Access Act (Public Law No: 110-84)
http://www.gpo.gov/fdsys/pkg/PLAW-110publ84/pdf/PLAW-110publ84.pdf

NCHE Issue Brief: ***Ensuring Full Participation in Extra-Curricular Activities for Students Experiencing Homelessness***
https://nche.ed.gov/wp-content/uploads/2018/10/extra_curr.pdf

NCHE Issue Brief: ***Maximizing Credit Accrual and Recovery for Homeless Students***
https://nche.ed.gov/wp-content/uploads/2019/01/Maximizing-Credit-Accrual.pdf

NCHE Issue Brief: ***Supporting the Education of Unaccompanied Students Experiencing Homelessness***
https://nche.ed.gov/wp-content/uploads/2018/10/youth.pdf

Family Education Rights and Privacy Act (FERPA)
https://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html

NCHE Youth Booklet: Surviving on Your Own: Information for Youth on How Schools Can Help
Order at https://nchehelpline.org/

NCHE ***Youth Rights Poster*** **(English and Spanish)**
Download at https://nche.ed.gov/downloads/
Order at https://nchehelpline.org/

NCHE ***Higher Education Poster***
Download at https://nche.ed.gov/downloads/

Section 9.13 Resources and Tools for Chapter 9

Appendix 9.A Unaccompanied Youth Eligibility Flowchart

Chapter Ten: Working with Parents

Section 10.1 McKinney-Vento and Parental Rights

The McKinney-Vento Act accords parents and guardians experiencing homelessness the right to have their voices heard on what they believe is in the best interest of their children. The law requires local liaisons to provide parents and guardians information on the McKinney-Vento Act and on the process for disputing decisions of the local educational agency (LEA) when they disagree on eligibility, enrollment, and best interest determinations for their children.

Section 10.2 Challenges in Working with Homeless Parents

Homelessness puts parents under inordinate stress. While most parents experiencing homelessness are cooperative and trust that school administrators, teachers, and staff have the best interest of their children in mind, some may be uncooperative and even confrontational. As the local homeless liaison, it is important to keep this in mind as you seek to build their trust and empower them to collaboratively increase their children's success in school.

Section 10.3 Working with Parents Who Have Experienced Trauma

Many homeless parents have experienced trauma, which predisposes them to losing control of their behavior when they experience things that trigger emotions or situations related to the trauma. Common trauma triggers for homeless parents include:

- a sense of being ignored or not being heard;
- a sense of being disrespected;
- a sense of being viewed as wrong or incompetent;
- a feeling of being threatened or pushed against a wall (literally or figuratively);
- the perception of being denied what they deserve or having things taken away;
- one too many requests or requirements; and
- being touched.

A seemingly innocent comment or subtle body language can trigger a counterproductive response on the part of a traumatized homeless parent.

Typical trauma responses include:

- flight (parents will minimize the seriousness of their challenges or those of their children and avoid taking responsibility);
- fight (parents will become aggressive and confrontational, and may even become verbally or physically abusive); and
- freeze (parents will become passive and nonresponsive).

See Section 10.6 Useful Links for a list of resources on trauma.

Section 10.4 Developing Rapport Through Communication

Communication is critical for developing trust with parents. Good rapport enables local liaisons to establish a working relationship with parents that results in good educational decisions for children. The following tips will help you develop positive, productive relationships with parents.

- Keep impersonal communication, such as letters and emails, to a minimum; conduct face-to-face or video conference conversations whenever possible.
- Provide a welcoming environment.
- Conduct sensitive conversations in a private and comfortable place.
- Avoid using the word "homeless" and other charged and judgmental language.
- Talk to them about their living situation; be sensitive and discreet.
- Ask them about their needs. A good question to ask is, "How may we be of assistance to you and your family? What would be helpful for you now?"
- Assure them that their children are welcome in your school and that you have their best interest in mind.
- Empower and encourage parents; discuss solutions to challenges with them.
- Discuss things about which they feel positive.
- Listen! Listen! Listen!
- Be aware of your own triggers. Notice when you are having a reaction to what the parent, guardian, or youth is saying and continue being present for them. Make sure you are always putting the needs of the family and youth first.

Section 10.5 Strategies for Working Together

Table 10.1 Challenges and Strategies for Working with Homeless Parents identifies some of the more common challenges in working with parents and provides some strategies for addressing the challenges. In addition, districts that receive a McKinney-Vento subgrant may use those funds to increase the meaningful involvement of parents and guardians in the education of their children [42 U.S.C. § 11433(d)(10)].

Table 10.1 Challenges and Strategies for Working with Homeless Parents

Challenges	Considerations	Strategies
Parents and their children have unmet basic needs.	• Parents may be new to an area and do not know what resources are available. • This may be the first time a family or youth has experienced financial instability and they might not know how to navigate social services systems.	• Encourage parents to advise you of their needs and assure them that you are willing to link them with available services. Make sure they know you are a resource they can come to whenever they have a need, not just at the initial assessment. • Provide an updated list of community resources and contacts to parents. • Keep a few donations on hand, such as hygiene items, grocery gift cards, snacks, and folders to store student records. (See Section 10.6 for a link to NCHE's Parent Pack Pocket Folders.) Solicit donations through community partnerships. • Use public transportation tokens to assist parents with getting to agencies from your office.
Parents are mistrustful and confrontational.	• Parents may have become disillusioned by agencies in the "helping" field. • Parents may fear having their children taken away. • Parents are passionate about getting what's best for their children and may feel any means justifies the end. • Parents may lack diplomacy skills. • Parents may bring a history of bad school experiences to their meeting with you. • Parents may have experienced trauma and may react with aggressive	• Be honest and respectful in dealing with parents and understand that building trust takes time. • Acknowledge parents' fear and worries. Make sure you are being supportive, not dismissive. • Be clear about resources that are available through the LEA and those available through other organizations. • Center conversations on what is best for their children while acknowledging their passion. • Discuss concrete solutions for what their children need and ways these solutions can be implemented; establish a tone of thinking things through together. • Model good communication behavior by remaining calm and respectful; keep the conversation focused and moving toward solutions.

Challenges	Considerations	Strategies
	behavior.	• If the conversation gets out of hand, set boundaries; if necessary "take five" or set a time to continue the discussion later.
Parents miss deadlines and meetings or do not follow through with expectations.	• Sometimes parents experience basic logistical challenges to meeting deadlines for tasks. • Parents may be under so much stress that they cannot follow through with expectations without help. • A lack of follow through is a classic trauma response (flight or freeze). • Parents may need guidance and structure to meet expectations.	• Determine if there is a simple solution to parents' lack of follow through, such as a need for an alarm clock, reliable transportation, or access to a phone. • Give parents responsibilities for helping their children be successful in school, but try to match the level of responsibility to what they can successfully handle. • Try to determine what is triggering a trauma response and see if you can eliminate this trigger. • Develop parent contracts or agreements for parents and the liaison to sign and agree to follow; specify the benefits and consequences for all parties. (See Appendix 10.A for guidelines on developing a parent agreement.) • Set goals and break them into attainable benchmarks to show progress.
Parents are experiencing hopelessness and helplessness.	• Parents may have experienced so much failure that they feel they have no chance of success and no assets to build on. • Working with service systems can reinforce a client mentality that causes parents to feel helpless. • Parents may carry with them the sense that they have failed their children and suffer embarrassment and self-degradation.	• Acknowledge something you observe that is positive: "It's obvious that you want your child to do well in school," or "You've overcome a lot of challenges to provide for your children in these difficult circumstances." • Ask for parents' input in any discussions regarding their children: "Your son is having a lot of difficulty in math; what do you think that comes from? What type of help do you think would work best for him?" • Share something you have observed in their child that indicates that he or she is resilient and can succeed.
Parents have poor skills in	• Parents may not have had success in	• Link parents with school or community parenting

Challenges	Considerations	Strategies
assisting with their children's education.	school and lack experience in knowing how to help their children be successful. • Parents may not have space or supplies in their temporary living circumstances to help their children with educational activities. • Parents may be so overwhelmed that they are emotionally unavailable to their children.	classes, especially if transportation and childcare are available. • Provide a basic parenting handbook, such as NCHE's *What You Need to Know to Help your Child in School*. (See Section10.6 Useful Links.) • Reinforce the importance of regular attendance and school stability; ask parents to inform you if they plan to move and ensure they understand their children's right to remain in the school of origin and receive transportation. • Model good parenting skills when you meet with parents; note something positive that their child did in school or some talent that their child is exhibiting; discuss good disciplinary practices that they can provide at home to reinforce improving behavior at school when needed. • Send notes home with the children frequently about something positive they did in school. • Provide parents with supplies to assist their children in their temporary living space or provide space either before or after school for the parent to work with children on homework or school activities. • Provide a space at school for children to keep school or project supplies where possible. • Invite parents to serve as tutors in the classroom or to be involved at school with their children's activities. • Invite parents to participate in parent groups at the school, such as the Parent Teacher Association. Help arrange transportation if possible.

Section 10.6 Useful Links

National Center for Homeless Education Resources by Topic: Trauma webpage **https://nche.ed.gov/trauma/**
National Center for Homeless Education Resources by Topic: Resources for Parents webpage **https://nche.ed.gov/parent-resources/**
National Center for Homeless Education *Parent Pack Pocket Folders* **Place online free or sales orders at https://nchehelpline.org/**
National Center for Homeless Education Parent Handbook: *What You Need to Know to Help Your Child in School* **English: https://nche.ed.gov/wp-content/uploads/2018/11/parentbrochure_eng.pdf** **Spanish: https://nche.ed.gov/wp-content/uploads/2018/11/parentbrochure_sp.pdf** **Place online free or sales orders at https://nchehelpline.org/**

Section 10.7 Resources and Tools for Chapter Ten

Appendix 10.A Suggested Guidelines for a Parent Agreement

Chapter Eleven: Collaboration

Section 11.1 Purpose

Cross-system collaboration has become far more common with the increased needs of homeless families and decreased availability of resources. Developing good working relationships with programs internal to the local educational agency (LEA) and with agencies outside the LEA increases the likelihood that homeless children, youth, and families will be identified and assisted to obtain educational and other needed services.

Section 11.2 What the McKinney-Vento Act Requires

The McKinney-Vento Act places a strong emphasis on collaboration as a means of meeting the needs of homeless students. Local liaisons and LEAs are required to serve homeless children and youth by coordinating with school personnel and community service agencies. Following is a summary of issues and activities that the McKinney-Vento Act requires that LEAs address through coordination and collaboration:

- coordinating services with local social service agencies and other agencies or entities providing services to homeless children, youths, and their families;
- facilitating transportation services, transfer of school records, and other inter-district activities;
- coordinating with housing agencies to minimize educational disruption for homeless children and youths;
- identifying homeless students;
- ensuring that homeless children and youths have access to and are in reasonable proximity to available education and related support services; and
- raising the awareness of school personnel and service providers about the effects of short-term stays in a shelter and other challenges associated with homelessness [42 U.S.C. § 11432(g)(5)].

Appendix 11.A McKinney-Vento Act Provisions and Guidance Related to Collaboration provides key excerpts of the mandates that focus on

collaboration.

Section 11.3 Collaborative Partners

To meet the needs of homeless students, local liaisons must have a diverse network of collaborative partners, as students experiencing homelessness have many needs beyond what schools have the ability to address on their own. Assisting families through referrals for additional services, such as housing, medical, dental, and social services, can increase stability and ensure students are ready to learn when they reach the classroom.

The following are examples of community partners that could be extremely helpful to liaisons in meeting the needs of homeless students:

- community food pantries;
- local health professionals who will volunteer services to help meet dental, medical, and mental health needs;
- local Boys and Girls Clubs, Big Brothers/Big Sisters, United Way, Salvation Army, and other shelter providers;
- faith-based organizations;
- local businesses and business associations involved in community service; and
- postsecondary education institutions.

Section 11.4 Collaboration with Federally-Funded Programs

The U.S. Department of Education's (ED) *Education for Homeless Children and Youths Program Non-Regulatory Guidance* includes a wealth of information on collaboration and coordination between LEAs and federally funded homeless service providers.

The guidance mentions specifically:

- LEA coordination with Head Start;
- the Individuals with Disabilities Education Act (IDEA), which includes child find requirements;
- housing programs and services funded by the U.S. Department of Housing and Urban Development (HUD); and
- programs and services funded under the Runaway and Homeless Youth Act (U.S. Department of Education, 2018, p. 18).

The guidance also includes collaborating with postsecondary organizations as the

College Cost Reduction Act amendments to the Higher Education Act authorize local liaisons to verify unaccompanied homeless youth status for the purpose of applying for independent student status below the age of 24 on the Free Application for Federal Student Aid (FAFSA) (U.S. Department of Education, 2018, p. 36).

Several federal programs administered by the U.S. Department of Agriculture (USDA) and the U.S. Department of Health and Human Services (HHS) use the McKinney-Vento Act's definition of "homeless children and youths." The guidance states that it is important for State Coordinators and local liaisons to coordinate with these programs in order to

- determine eligibility consistently across agencies serving the same families, children, and youths;
- coordinate or expedite referrals for services; and
- coordinate services overall for families or youths in order to improve education and other outcomes for homeless children and youths (U.S. Department of Education, 2018, p. 36-37).

The guidance also recommends coordinating with programs that do not use the McKinney-Vento definition of homeless, such as Runaway and Homeless Youth Act programs and HUD-administered homeless assistance programs to

- develop a more detailed understanding of the needs of the homeless populations;
- ensure that the families they serve are familiar with their educational rights under the McKinney-Vento Act; and
- coordinate referrals (U.S. Department of Education, 2018, p. 37-38).

Local liaisons should also reach out to policy makers and legislators to discuss local laws and policies that create barriers for homeless children and youth, such as policies that criminalize homelessness or create difficulties for homeless families to obtain affordable housing.

Appendix 11.B Collaborations Required by Law provides more information about organizations and programs specifically named in the McKinney-Vento Act as mandated partners for collaboration related to the education of homeless children and youth.

Section 11.5 Sharing Data across Agencies

Sharing data is a foundational activity that will help each partner understand the

other's program and clients or stakeholders. The 2018 guidance states that State Coordinators and local liaisons may work with their agency counterparts to set up interagency agreements for sharing relevant data to use for planning, coordination, and evaluation. Such agreements must be consistent with FERPA (Family Educational Rights and Privacy Act , 20 U.S.C. § 1232g(34)(99)), the confidentiality of information provisions in Parts B and C of IDEA, and other relevant federal and state laws protecting the privacy of student and family information. (U.S. Department of Education, 2018, p. 36)

An ED brief entitled *Interagency Data Disclosure: A Tip Sheet on Interagency Collaboration* (See 11.6 Useful Links) spells out clearly from a federal perspective what is and is not allowed in data sharing among agencies and should dispel concerns surrounding this issue.

Section 11.6 Collaboration with Title I

Strong collaboration between McKinney-Vento programs and Title I programs ensures that Title I programs include the specific needs of homeless children and youth. An LEA's Title I plan must demonstrate timely and meaningful consultation with McKinney-Vento administrators, and the local Title I plan must be coordinated with the McKinney-Vento program [20 U.S.C. § 6312(a)(1)]. The plan must include the services the LEA will provide homeless children and youth, including services provided through the homeless reservation of funds [20 U.S.C. § 6312(b)(6)].

The Title I statute states that the reservation of funds for homeless students "may be determined based on a needs assessment of homeless children and youths in the local educational agency" [20 U.S.C. § 6313(c)(3)(C)(i)].

Following are some recommendations for ways that local liaisons and local Title I coordinators can collaborate.

- Local liaisons should share data on homeless children and youth with Title I coordinators as a basis for determining the amount for the Title I reservation of funds for homeless students.
- Local liaisons should attend Title I conferences and in-services, and Title I coordinators should attend homeless education conferences and in-service professional development; they should present at one another's conferences or plan joint presentations.
- Local liaisons should work with Title I coordinators on the LEA plan that must include ways to address the needs of homeless children and youth.

- Title I and homeless education handbooks should be shared with other program staff.
- Title I parental involvement policies should include homeless parents and create opportunities for homeless parents to be involved.

Section 11.7 Types of Collaboration

Collaboration entails a wide range of interactions among agencies and programs that can vary by the amount of interface involved, the time invested, the resources leveraged, and outcome desired. Local liaisons should be strategic in determining the best type of interaction for the outcomes they wish to achieve. Some collaborations will simply involve creating awareness of the needs of homeless children and youth as a foundation for coordination while others, usually among agencies that have established partnerships, will involve more complex activities that integrate resources and conduct joint initiatives.

Following are several types of activities to consider as you reach out to other programs and agencies, listed from simple to complex:

1. Networking (conducting awareness meetings);
2. Cooperating (understanding and respecting one another's purpose and boundaries);
3. Coordinating (identifying needs and overlap and determining how each agency can best utilize its resources for the most comprehensive services);
4. Collaborating (developing a unified approach to addressing needs, in which each agency agrees to contribute resources to a common goal).

Appendix 11.C Basic Tips for Collaboration contains some considerations for partnerships at every level of development.

Section 11.8 Benefits

Establishing and building collaborations can be a daunting task for liaisons with multiple responsibilities. However, coordinating services and working with other programs and agencies can lead to substantial benefits for both homeless students and liaisons alike. Some of the benefits that local liaisons can reap by incorporating partnerships into their daily work include the following:

- Knowledge of basic information about the community related to issues impacting students and available services, such as knowledge of the locations of all local shelters that accept children, youth, and families and familiarity

with staff at these institutions, can expedite enrollment and connections to transportation.

- Familiarity with low-income motels and their managers can facilitate enrollment for students and increase the identification of students who might otherwise be overlooked.
- Connections with local agencies can lead to creating a simple list of contacts for local resources, which can be a handy reference when liaisons or school staff members receive calls for specific services.
- Supportive community resources can make homeless families' lives safer, more secure, and more stable when liaisons link families to them. In this way, liaisons can be instrumental in ensuring coordinated delivery of services by bringing community agencies together.
- Training cafeteria and school nutrition staff on homelessness can increase the identification of homeless students and their access to basic needs.

While the preceding list provides some general examples of the benefits that can result in working with other programs, the following information gives some real-life examples of successes achieved by liaisons and their partners.

- A liaison in Colorado created a partnership with city HOME program administrators. The project provided transitional living and other housing assistance to families identified as homeless by the school district while repurposing vacant housing in the area.
- A Montana liaison established a relationship with a local restaurant that provided meals to unaccompanied homeless youth.
- A district in North Carolina worked with the local mental health agency to provide intensive counseling and crisis services to students.
- A district in Arkansas collaborated with several volunteers, seamstresses, and donors to provide items to juniors and seniors for prom. While not a basic need, the project allowed students to fully participate in school activities by attending an event in which they would be unable to participate otherwise.

11.9 Useful Links

U.S. Department of Education
Education for Homeless Children and Youth Program Non-Regulatory Guidance
https://www2.ed.gov/policy/elsec/leg/essa/160240ehcyguidanceupdated082718.docx

Interagency Data Disclosure: A Tip Sheet on Interagency Collaboration
U.S. Department of Education
https://www2.ed.gov/programs/homeless/ehcy-interagency-data-disclosure.pdf

National Center for Homeless Education
Resources by Topic: Collaboration webpage
https://nche.ed.gov/collaboration/

U.S. Department of Education
Web Page on Initiatives Supporting Homeless Students
http://www2.ed.gov/about/inits/ed/supporting-homeless-students/index.html

Title VII, Subtitle B of the McKinney-Vento Homeless Assistance Act
(Education for Homeless Children and Youths)
42 U.S.C. §§ 11431-11434A
http://uscode.house.gov

Section 11.10 Resources and Tools for Chapter Eleven

Appendix 11.A McKinney-Vento Act Provisions and Guidance Related to Collaboration

Appendix 11.B Collaborations Required by Law

Appendix 11.C Basic Tips for Collaboration

Chapter 12: Training and Awareness

According to the McKinney-Vento Act, the local liaison is responsible for:

- ensuring that school personnel identify homeless children and youth through outreach and coordination with other entities and agencies [42 U.S.C. § 11432(g)(6)(A)(i)];
- ensuring that homeless students and their families receive educational services, including Head Start and other preschool programs [42 U.S.C. § 11432(g)(6)(A)(iii)]; referrals to health care, mental health, and dental services, and other appropriate services [42 U.S.C. § 11432(g)(6)(A)(iv)]; and
- coordinating and collaborating with the State Coordinator for homeless education as well as community and school personnel responsible for the provision of education and related services to homeless children and youth [42 U.S.C. § 11432(g)(6)(C)].

In order to successfully meet these responsibilities, all local liaisons must provide information and resources to school district personnel and community partners. Awareness raising activities must be designed to heighten the understanding and sensitivity of personnel to the needs of homeless children and youth, their rights, and their specific educational needs [42 U.S.C. § 11433(d)(3)]. Districts that receive a McKinney-Vento subgrant may use those funds to provide professional development for educators and pupil services personnel.

Section 12.1 Designing Professional Development Opportunities

Professional development enhances the skills and knowledge of individuals and is delivered through a variety of methods. It can include informal methods, such as sharing information in district meetings, or more formal learning, such as structured training and courses. Information that assists professionals with using the skills and abilities they already possess is considered basic professional development, while advanced professional development helps staff acquire new information and skills.

As local liaisons create professional development opportunities that focus on the issue of homeless education for school district staff and community partners, it is important to keep in mind some important tenets of adult education. In general, adult learners:

- are selective and self-directed;
- bring a wide variety of experiences to the educational setting;
- focus on practical solutions and applications of information;
- need an opportunity to participate or apply new information; and
- assimilate information more effectively when the learning process includes a discussion.

Keeping these tenets in mind, it is critical to consider the needs of the various members of the audience as local liaisons provide professional development and related activities. For example, district administrators may be most concerned with academic measures for homeless students, while registrars may focus on enrollment requirements. Furthermore, community partners may need information about how to best work with school systems to meet both academic and other basic needs. Effective training and awareness activities meet the needs of students experiencing homelessness by meeting the continuing education needs of district staff and community stakeholders, regardless of their roles.

Appendix 12.A Presenter Tips has some additional hints for developing presentations. Appendix 12.B Common Signs of Homelessness can be used as a handout to increase the basic awareness of homeless students for audiences with less familiarity with the topic.

Section 12.2 Training Materials and Resources

The National Center for Homeless Education (NCHE) has several types of materials and resources available to help liaisons provide training and raise awareness in their school communities.

Homeless Education Briefs

NCHE homeless education issue briefs discuss selected issues pertaining to the McKinney-Vento Homeless Assistance Act and suggest strategies for implementation. In addition to being topic specific, many are also tailored to particular audiences to maximize impact. Briefs may be accessed by visiting https://nche.ed.gov/resources/.

Online Training Options
NCHE offers several types of online resources. All of the following may be viewed by visiting https://nche.ed.gov/self-paced-online-training/.

- PowerPoint presentations designed by NCHE staff and partners are available for liaisons to download for use in their own local training sessions. The slides are customizable so that local data and contact information may be easily included.
- NCHE's online training videos give a brief introduction to key issues covered by the McKinney-Vento Act and offer self-paced learning.
- Pre-recorded webinars are updated regularly to ensure they provide comprehensive information related to different aspects of the law.

Free Monthly Webinars
NCHE also offers free, monthly webinars. These live webinars focus on various aspects of implementing the McKinney-Vento Act and are open to any stakeholder in the education of students experiencing homelessness. The schedule of monthly offerings may be accessed online at https://nche.ed.gov/group-training/.

Sample Training Materials
The NCHE website contains samples of training and related materials created by homeless education programs or agencies focusing on the needs of homeless families.

- Awareness videos on homelessness and homeless education can be accessed by visiting https://nche.ed.gov/videos/
- Curricula resources for educating students and others about homelessness are available at https://nche.ed.gov/curricula/
- A variety of materials for training school personnel can be downloaded at https://nche.ed.gov/personnel-resources/

Additional materials are added as they become available, so liaisons should revisit the web pages as they plan training opportunities each year.

Section 12.3 Resources and Tools for Chapter Twelve

Appendix 12.A Presenter Tips
Appendix 12.B Common Signs of Homelessness

Chapter Thirteen: Data Collection & Requirements

Section 13.1 Why Data Matters

Regardless of whether you love or hate working with data, there are several reasons why it is important to collect and analyze data related to the education of homeless children and youths. At the most basic level, we collect data because:

- The McKinney-Vento Act requires data to be collected and provided to the federal government [42 U.S.C. § 11432(f)(1), 42 U.S.C. § 11432 (f)(3)] and for the Secretary of Education to disseminate that information to stakeholders [42 U.S.C. § 11434(h)(1)]. Additionally, state educational agencies (SEAs) must include counts of homeless students on their agency websites [42 U.S.C. § 11432(f)(1)(A)].
- Local educational agencies (LEAs) that compete for subgrant funds must provide needs assessments and demonstrate a need for funds as part of their subgrant applications [42 U.S.C. § 11433(b)(1)]. Likewise, state educational agencies (SEAs) may consider the number of homeless students enrolled in the LEA prior to making subgrant awards [42 U.S.C. § 11433(c)(2)].
- SEAs must consider the quality of a subgrant application, the appropriateness of proposed activities based on identified student needs, and past success in meeting student needs before making awards [42 U.S.C. § 11433(c)(3), 2 C.F.R. Section 200.205].
- Data collections regarding the services homeless students receive and their academic outcomes are required by the U.S. Department of Education (ED) to ensure compliance with Title I, Part A and state report card requirements in the Elementary and Secondary Education Act (ESEA).
- Data is used to calculate the set-aside for serving homeless students under Title I, Part A.

Section 13.2 What Data to Collect

> *To learn more about the ED*Facts *Initiative and the process used by ED to collect data from SEAs, visit* https://nche.ed.gov/data-collection/

In order to meet the data collection and dissemination requirements in federal law, the U.S. Department of Education (ED) identified several pieces of data considered essential to evaluating outcomes for homeless students. Schools are required to collect and provide the identified data to their SEAs on an annual basis; the SEAs then submit the information to ED and use the data for required elements of public reports like state report cards. ED created a data warehouse, as a part of the ED*Facts* Initiative, to store all the data submitted by SEAs regarding the education of students experiencing homelessness and other federal education programs. This data is then used by ED to create reports for Congress, the general public, and state coordinators.

The essential pieces of data that must be submitted to ED annually include:

- the number of LEAs in the state that do and do not receive subgrants;
- the number of LEAs in the state that do and do not report homeless education data;
- the number of homeless students enrolled in each grade, including preschool;
- the primary nighttime residence of homeless students enrolled in school, including the primary nighttime residence of unaccompanied homeless youth;
- the number of homeless students enrolled in school that are a part of particular subgroups, including English learners, unaccompanied homeless youth, students with disabilities, and migratory students;
- the number of homeless students by race/ethnicity;
- the number of young homeless children and youth served by McKinney-Vento subgrants;
- the participation and performance of homeless students on reading, math, and science assessments;
- the number of homeless students that drop out or graduate, including adjusted cohort graduation rates;
- the number of homeless students who are chronically absent;
- the number of homeless students who are served by Title I, Part A; and

- the number of homeless students who meet other measures of academic achievement identified by the state.

Section 13.3 How to Collect and Submit Data

Collecting data about homeless education requires collaboration both within the district and with the SEA. In the fall of each year, State Coordinators work with the SEA ED*Facts* Coordinator to submit required data from the previous school year to ED. In order for State Coordinators to submit the mandated data to the federal government, SEAs typically require LEAs to complete data submissions in the late spring or early summer of each year, coinciding with the end of the school year. A breakdown in communication between the liaison and the district's data staff or the State Coordinator can result in a report containing data of poor quality.

SEAs use electronic data collection systems and require very little to no actual paper reports from LEAs. As districts are required to report a variety of data to the SEA, most LEA data are submitted to the SEA by a designated person within the district and not directly by the liaison. As a result, the liaison must work with the responsible individual to ensure that the data submitted are accurate and reflect the work of the district to serve homeless students. LEAs that submit incomplete data or information that appears incorrect will be contacted by the State Coordinator in order to resolve any outstanding issues.

While most data on homeless students is submitted by the data staff in the LEA, the State Coordinator may collect some information about subgrants directly from the liaison. The State Coordinator can provide liaisons with information about how and when the LEA should submit data.

As no two state or LEA data collection systems are exactly alike, it is important to know with whom the liaison should work to collect and submit data, as well as which questions to ask about the way data should be collected, stored, and submitted. All liaisons are encouraged to work with their State Coordinators, in addition to any local district staff involved in reporting, to make sure all required information is submitted in a timely manner. Important questions to ask include:

- Does the district have a data reporting technician? Who is that person or are those persons?
- Are there additional data, which the primary data system is unable to collect, that the liaison is responsible for submitting to the SEA? What are those data? What is the process for submitting those data?
- How does the LEA collect and store data? Does it use a web-based or other electronic student information system? Does it rely on spreadsheets?
- What is the deadline for submitting data to the SEA? Does the LEA have additional internal deadlines to allow administrators to review the data before the final submission to the SEA?
- What steps does the LEA take to ensure the data submitted are accurate? Are there any steps required by the SEA to ensure data are accurate?
- Can the LEA correct data that have already been submitted? Are there additional deadlines for corrections?
- In addition to the annual data collection requirements outlined by ED that apply to all LEAs, does the SEA require additional information on student outcomes for homeless students in any particular area, either through improvement plans or subgrant applications?

Section 13.4 Using the Data

While the most basic reason we collect data is because the law requires it, a better reason to collect information on student outcomes is to help the students succeed. Homeless students face unique challenges in their educational pursuits and need education strategies to counter those challenges. However, given the number of things liaisons are tasked with completing each day, it is easy to think about to-do lists instead of how those to-do lists support long term program goals.

While the data collections required by ED are critical for measuring program outcomes, LEAs may find they need to examine additional pieces of information to help students succeed. In addition to the data that must be collected under McKinney-Vento and ESEA requirements, other state and federal programs also require data to be collected. This data can be accessed by working with the LEA's data staff and may provide useful information about why homeless students are or are not succeeding in school.

Other data available at the LEA level for homeless students, students overall, or other subgroups of students include

- the number of suspensions and expulsions students had;
- reasons for expulsions;
- the reasons students missed school;
- information on participation in gifted and talented programs;
- the number of students with an Individualized Education Plan (IEP) and the disabilities addressed by the IEP;
- poverty rates;
- types of diplomas earned;
- reasons cited by students for dropping out;
- participation and performance in advanced placement courses; and
- participation in school meals.

By comparing these data to the data required under the federal law, liaisons can identify areas for improvement that are unique to their LEAs. For example, while district personnel may assume that all homeless students receive free school meals, a review of the number of homeless students compared to the number of homeless students who receive free school meals may highlight a significant gap in services. A more in-depth examination of data related to homeless students can improve collaboration as well. For example, uncovering high rates of suspensions for defiance in the classroom combined with high rates of IEPs for emotional disturbances may allow homeless liaisons and special education teachers to work together to create more effective IEPs.

Additionally, other public data that are easily available, such as unemployment or poverty rates, could help liaisons and community agencies collaborate to more accurately identify homeless students when the number of students identified is low, but unemployment or poverty rates are high. This type of data examination should be used by LEAs to strengthen the school improvement plans required under state and federal law to improve outcomes for children and youth experiencing homelessness.

Section 13.5 Confidentiality

Districts should carefully review all data sharing policies and agreements on a regular basis to ensure that they are consistent with state and federal laws that protect student records and confidentiality. The Family Educational

Rights and Privacy Act (FERPA) is a federal law that outlines what information may be shared, by whom, and when. Districts should ensure that district policies are consistent with requirements under FERPA.

Section 13.6 Useful Links

Family Educational Rights and Privacy Act, 20 U.S.C. § 1232(g)
https://www.gpo.gov/fdsys/pkg/USCODE-2011-title20/pdf/USCODE-2011-title20-chap31-subchapIII-part4-sec1232g.pdf

Guide to Collecting and Reporting Federal Data: Education for Homeless Children and Youth
https://nche.ed.gov/data-collection/

Chapter Fourteen: Subgrants

Section 14.1 Overview of McKinney-Vento Subgrants

The McKinney-Vento Act requires most states to allocate at least 75% of their annual federal award to local educational agencies (LEAs) in the form of subgrants. Minimally funded states, those that only receive $150,000, are required to allocate at least 50% of their annual federal award to LEAs. The purpose of the subgrants is to facilitate the identification, enrollment, attendance, and success in school of homeless children and youth. These subgrants are competitive, and awarded on the basis of both need and quality of the application.

The state educational agency (SEA) determines the time period for the grant cycle, the number of grants awarded, and the size of grants. An LEA may receive a grant for up to three years before it must re-compete to receive further grant funds [42 U.S.C. § 11433(a)(4)]. Some SEAs award subgrants to consortia of LEAs that agree to coordinate services or regions that cover several LEAs. LEAs must be the fiscal agents for the subgrants and accountable for their implementation.

LEAs and local liaisons should receive information from the State Coordinator on the subgrant competition. Each state is responsible for implementing a grant process, including the development of an application that meets federal requirements, for use by LEAs. Typically, State Coordinators also provide technical assistance to help liaisons completing applications.

Section 14.2 Requirements for Subgrants in the McKinney-Vento Act

The McKinney-Vento Act requires that each application include

- an assessment of the educational and related needs of homeless children and youth in the area served by such agency;
- a description of services and programs that will be provided through the grant;

- an assurance that the LEA's fiscal effort in providing a public education was maintained;
- an assurance that the applicant complies with or will use requested funds to comply with the Act;
- a description of policies and procedures to ensure that activities will not isolate or stigmatize homeless children and youth;
- an assurance that the LEA will collect and promptly provide data requested by the State Coordinator; and
- an assurance that the LEA will comply with the requirements of section 722(g)(3) [42 U.S.C. § 11433(b)].

The LEA's need for funding and the quality of the application submitted by the LEA form the basis of awards made by the state. In determining the need for funding, SEAs may consider the number of homeless children and youth enrolled in early child education or other preschool programs, elementary schools, and secondary schools within the area served by the LEA. Additionally, the SEA must consider:

- the needs of homeless children and youths enrolled in the LEA
- the ability of the LEA to meet the identified needs [42 U.S.C § 11433(c)(2)].

The SEA may also consider:

- the extent to which the proposed activities will facilitate the identification, enrollment, retention, and educational success of homeless children and youth;
- the extent to which the application reflects coordination with other local and state agencies that serve homeless children and youth and describes how the applicant will meet the general requirements of the McKinney-Vento Act;
- the extent to which a commitment to the education of all homeless children and youth is demonstrated, both in the application and in current practice; and
- other criteria established by the SEA [42 U.S.C. § 11433(c)(2)].

In determining the quality of the application, the McKinney-Vento Act requires SEAs to consider:

- the needs assessment and the likelihood that the proposed project will meet the needs identified;

- the types, intensity, and coordination of services to be provided through the proposed project;
- the extent to which the applicant will promote meaningful involvement of parents or guardians in the education of their children;
- the extent to which homeless children and youth will be integrated into the regular education program;
- the quality of the project's evaluation plan;
- the extent to which proposed services will be coordinated with other services available to homeless children and youth and their families;
- the extent to which the LEA will use the subgrant to leverage resources, including by maximizing nonsubgrant funding for the position of liaison;
- how the LEA will use funds to serve homeless children and youths under section 1113(c)(3) of the Elementary and Secondary Education Act of 1965 (Title I, Part A); and
- the extent to which the applicant's program meets such other measures as the SEA considers indicative of a high-quality, such as the extent to which the LEA will provide case management or related services to unaccompanied homeless youth [42 U.S.C. § 11433 (c)(3)].

Section 14.3 Allowable Uses of Subgrant Funds

Coordinators for the McKinney-Vento subgrant program should be familiar with the allowable uses of funds listed in the Act [42 U.S.C. § 11433 (d)]. Appendix 14.A McKinney-Vento Subgrant Authorized Activities includes the list of allowable activities.

Section 14.4 Guiding Questions for Use of Subgrant Funds

Table 14.1 Guiding Questions for McKinney-Vento Subgrant Expenses will help liaisons determine the appropriateness of expenditures. If at any time you are unsure if an expense is allowable, you should contact your State Coordinator for clarification. LEAs should also contact their State Coordinators before making any substantial changes to an approved budget to ensure the changes are approved.

Table 14.1 Guiding Questions for McKinney-Vento Subgrant Expenses

Foundation	Questions to Consider
The Law: Subgrants	1. Does the expense meet the intent of the law, which is to facilitate the identification, enrollment, attendance, or success in school of homeless children and youth? 2. Can the expense be categorized as one of the authorized activities in the law? 3. Is the expense connected to the educational needs of homeless children and youth specifically? (The exception would be for services provided on school grounds; these services may include a small percentage of other at-risk students.)
The Subgrant Proposal	1. Does the expense fit within goals articulated and approved in the subgrant proposal? 2. Does the expense meet a need identified in a comprehensive needs assessment? 3. Was the expense included and approved in the subgrant budget? 4. Is the expense necessary for efficient operation of the homeless education program? 5. Is the expense reasonable in proportion to the rest of the program budget and in proportion to the amount spent per student? Or, if this is an expense for one student, is it proportional to other program or students' needs? 6. Is the cost for this service reasonable?
The Law: Coordination and Collaboration	1. Is this expense for supplemental services and not for services that the LEA should pay for as a part of the regular academic program? 2. Is the expense for services additional to the comparable services the LEA provides to non-homeless students and should provide to homeless students? 3. Is there evidence of coordination with Title I, Part A for use of the Title I, Part A set-aside to serve homeless students? 4. Did the LEAs make an effort to obtain this service from another source, such as business partners and service agencies? 5. Is this expense beyond the scope of the McKinney-Vento program and more appropriately covered by a community service agency?

Section 14.5 State and Local Policies for Subgrant Administration

LEAs must follow state and local policies related to grant administration, including fiscal accountability and record keeping. Once the grant is awarded, LEAs are bound to carry out the activities as proposed. If a change in the activities is needed, local liaisons (or the subgrant coordinator) must contact the State Coordinator for approval of the change and budget amendment.

As noted earlier, LEAs are accountable for the implementation of the projects proposed in the subgrant application. To that end, LEAs are required to submit end-of-year reports or program evaluation summaries. States also review subgrant activities and request evidence of adequate fiscal controls within the LEA during monitoring visits and desk-monitoring. Therefore, keeping good records of activities and expenses is of paramount importance

Section 14.6 Resources and Tools for Chapter Fourteen

Appendix 14.A McKinney-Vento Subgrant Authorized Activities

Chapter Fifteen: Managing the Work

The work of the local homeless liaison can be demanding and varied. Whether you are a new or seasoned liaison, full time or part time, there are a number of strategies that you can implement to work more effectively and efficiently. The suggestions provided in this section will help you organize your work, increase your capacity, and prioritize your activities.

Section 15.1 Identify the Level of Urgency

In the course of a day, you are likely to face a number of challenges and tasks that need attention. It is important to keep in mind that not all tasks are of equal importance. Quite often, taking care of something important in a systematic and comprehensive way will prevent the issue from becoming a crisis later.

One way to approach multiple demands is to look at Stephen Covey's *Seven Habits of Effective People* (Free Press, 1989). Covey suggests that work can be categorized into four quadrants, as illustrated in Table 15.1 Covey's Quadrants.

According to Covey, effective people try to spend as much time as they can in Quadrant II and limit time spent in Quadrant IV. This proactive strategy of focusing on important work that is not urgent and avoiding time wasters can reduce the need to address Quadrant I issues. Prioritizing your work by determining in which quadrant the task would fall can help you decide where to spend your time. Note that a number of tasks may begin in Quadrant II but become Quadrant I if not completed in advance. For example, planning your annual data submission as a long-range project may have a number of steps that, if addressed early, are important but not urgent. Without preplanning, the submission of data can "creep up on you" and become an urgent, deadline-driven project.

Appendix 15.A Template of Quadrants to Determine Priorities provides a table divided into the four quadrants so that you can determine on which important but not urgent activities to focus.

Table 15.1 Covey's Quadrants

	URGENT	**NOT URGENT**
IMPORTANT	QUADRANT I • Arranging transportation to the school of origin • Resolving a dispute • Connecting a homeless family to a place to stay • Responding to a time sensitive request from a legislator, the media, public, or superintendent • Meeting the deadline to submit data for the Consolidated State Performance Report (CSPR)	QUADRANT II • Conducting a needs assessment to prioritize tasks • Developing local policies and procedures to remove barriers to enrollment and attendance • Providing awareness and training to school and school district staff • Developing collaborative partnerships • Preparing CSPR data collection
NOT IMPORTANT	QUADRANT III • Attending mandatory staff meetings not related to homeless students and their needs • Responding to a request for information that could easily be posted on the district website • Searching through files to compile information in preparation for a monitoring visit	QUADRANT IV • Responding to every email as it arrives in your office, rather than prioritizing which needs an immediate answer • Meeting with colleagues on issues not related to serving homeless children and youth • Attending community meetings in which you do not have a specific role

Section 15.2 Keep the Main Thing the Main Thing

In an era of limited resources and competing agendas, it is often easy to lose sight of the purpose of your work. The following two guidelines will help you keep focused when serving homeless children and youth.

1) Case-by-case eligibility determinations are a must. All homeless families, children, and youth are different, as are the circumstances that brought them into homelessness. Therefore, each child or youth's situation must be reviewed individually to determine how to apply the McKinney-Vento Act and identify appropriate services.
2) All services and decisions should be child-centered and in the best interest of the student. Every discussion and task you undertake

should focus on what is in the best interest of children and youth. Keep in mind, and remind others as often as necessary, that the goal is the success of homeless children and youth in school. Sharing their stories when you advocate for their needs puts a face on the decisions that are made.

Section 15.3 Know the Law

Familiarity with the McKinney-Vento Act is critical for liaisons to successfully apply it. You should read the full text of the law (See 15.9 Useful Links) and keep a copy on hand to revisit on a regular basis. Some liaisons have tabbed key sections and definitions in the Act to make it easy for them to quickly find answers when questions arise. The following list provides some of the key passages to which liaisons need ready access:

- Local educational agency (LEA) requirements: 42 U.S.C. § 11432 (g)(3)
- Local liaison duties: 42 U.S.C. § 11432 (g)(6)
- Enrollment: 42 U.S.C. § 11432 (g)(3)(C))
- School selection: 42 U.S.C. § 11432 (g)(3)(A)
- Best interest: 42 U.S.C. § 11432 (g)(3)(B)
- Dispute resolution: 42 U.S.C. § 11432 (g)(3)(E)
- Transportation to and from the school of origin: 42 U.S.C. § 11432 (g)(1)(J)(iii)
- Comparable services: 42 U.S.C. § 11432 (g)(4)
- Definition of homeless: 42 U.S.C. § 11434a (2)
- Definition of unaccompanied youth: 42 U.S.C. § 11434a (2)(B)(6)
- Definition of the school of origin: 42 U.S.C. § 11432 (g)(3)(I)
- Definition of enrollment: 42 U.S.C. § 11434a (1)
- Authorized activities for subgrants: 42 U.S.C. § 11433 (d)

Section 15.4 Identify Your Supports

Having resources and supports at your fingertips will enable you to access help when you need it. Some liaisons call these resources their "Top Fives." Appendix 15.B Top Five List is a worksheet that will help you create your own list of key resources. While this list should be tailored to your own needs, some resources and key contacts are recommended below.

People to Know	State Coordinator Title I Coordinator Child Nutrition Coordinator Pupil Transportation Director Data Manager Budget Manager
National Resources	National Center for Homeless Education National Association for the Education of Homeless Children & Youth SchoolHouse Connection
Documents to Keep on Hand	*McKinney-Vento Act* *Education for Homeless Children and Youth Non-Regulatory Guidance* NCHE *Homeless Liaison Toolkit* Child Nutrition Memos
Programs with Which to Coordinate	Title I School Nutrition Exceptional Children/Special Education Early Learning, e.g., Pre-K and Head Start Career and Technical Education (CTE) HUD Continuum of Care Runaway and Youth Act Programs
Key NCHE Briefs	*Determining Eligibility for Rights and Services Under the McKinney-Vento Act* *School Selection* *Serving Students Experiencing Homelessness Under Title I, Part A* *Transporting Children and Youth Experiencing Homelessness* *Supporting the Education of Unaccompanied Homeless Students*

Section 15.5 Create Capacity in Others

Making sure that school and district staff and administrators understand the needs of homeless students and their rights under the McKinney-Vento Act enables them to work more effectively with the students. Seek opportunities

to provide staff and administrators with training and information and establish routine communication with them. Many issues can be addressed at the school site without your intervention once others are trained on basic information related to the Act. This will preserve your time for addressing more complex issues.

As you begin planning awareness and training activities, remember to schedule the activities on an annual calendar to help you prioritize. For example, in a district with a large number of new enrollment staff, training for those staff members should be conducted as soon as possible.

LEAs with many schools or a part-time local liaison frequently appoint a school level contact in addition to the district liaison. Assigning a point of contact in each building will make it more likely that materials sent to the school regarding homelessness will get to appropriate staff and be read. The contact becomes a resource to call when problems arise. You can work with principals to identify appropriate contacts and create a simple form for them to complete to ensure you have the correct person's contact information. (See Appendix 15.C for a sample.) School level contacts should be trained on the McKinney-Vento Act and on protocols for identifying, enrolling, and serving homeless children. They should also be provided posters and flyers to disseminate at their school and community organizations.

Section 15.6 Assess and Prioritize Needs

Most program managers agree that designing services and activities based on a needs assessment is a way to target time and resources in the most effective way. Whether you have the time and support to conduct a formal needs assessment or can only review a set of questions about homeless students in your LEA, a focused effort to determine the most critical needs of students and the existing gaps in services will help you identify important issues to address.

An NCHE document that will assist you in assessing the needs of homeless students in your LEA is the *Local Educational Agency Informal Needs Assessment*. (See Section 15.9 Useful Links.) This document provides a wealth of good strategies for conducting a needs assessment. It includes a worksheet for LEAs, which aligns with LEA requirements in the McKinney-Vento Act,

good practices promoted in the non-regulatory guidance, and priorities established by federal monitoring. The worksheet included in the needs assessment guide is also included for your convenience as Appendix 15.D Needs Assessment Worksheet and Summary.

Needs assessments should be updated annually with new numbers and data in order to identify trends and emerging issues. Applications for subgrant funds must also include a needs assessment as part of the application.

Not only a good tool to assist you in planning your program, a needs assessment is also essential for increasing awareness and advocating for resources. It can provide direction for discussions with the Title I coordinator and community agencies.

Section 15.7 Create a School District Homeless Education Protocol

A homeless education protocol is a written plan detailing the district's procedures for interacting and communicating with and about homeless students and families. It includes checklists for tasks; delineates clear roles, responsibilities, and timelines; and requires the use of standard forms across the district. Standardized processes ensure consistency, enable better service provision, and create opportunities for staff to develop good relationships with students, parents, and community members.

District protocols for serving homeless students are based on the responsibilities of the liaison and the LEA, including

- identifying and enrolling students;
- linking homeless students to educational and related services;
- informing parents, guardians and unaccompanied homeless youth of student rights and available services, including transportation;
- providing opportunities for parents to participate in their children's education;
- posting public notice of educational rights;
- mediating disputes;
- collaborating and coordinating with State Coordinators, community, and school personnel;
- reviewing and revising policies that act as barriers, including those related to enrollment, transportation, immunization, residency, birth certificate, school records, other documentation, guardianship, and barriers due to outstanding fees, fines, or absences;

- ensuring that homeless children and youth do not face barriers to accessing extracurricular activities, including magnet school, summer school, career and technical education, advanced placement, online learning, and charter school programs, if available;
- reviewing and revising policies to enable homeless youth to receive appropriate credit for full or partial coursework satisfactorily completed while attending a prior school; and
- giving special attention to out-of-school homeless youth.

Enrollment procedures for front office staff are a major component of any district's policy and procedure protocols. Procedures for enrollment staff should establish:

- conditions when front office staff may determine eligibility;
- guidance on when to refer families or youth to the liaison;
- instructions for how to maintain confidentiality and for what information can be shared;
- steps to ensure all siblings are identified; and
- directions for noting homeless status in records to maintain confidentiality.

To further simplify procedures, liaisons should provide enrollment staff with

- tips for talking with families and youth;
- substitute terms for "homeless;"
- topics to cover with families and youth in a checklist format;
- information on the definition of homelessness, educational rights of homeless students, and their options for school selection;
- steps to take to acquire missing records;
- steps to take if a dispute with a parent, guardian, or unaccompanied youth arises; and
- a form to quickly assess student needs, including academic, basic, and other needs that can be addressed by the school or a collaborative partner.

School personnel often struggle with how to enroll and serve unaccompanied homeless youth, so policies dealing specifically with this population will be very useful. Issues to consider include who can enroll an unaccompanied homeless youth; who can make school placement decisions and under what conditions; and who is responsible for arranging transportation and how that should be done. Other important considerations include deciding whether

the district will assign an unaccompanied homeless youth an advocate or rely on the liaison to assist the youth in the case of a dispute and identifying appropriate persons to sign medication logs, permission slips, class schedule changes, and notes related to attendance and discipline.

Section 15.8 Keep Program Records and Documents

The most efficient programs have records and documents that are organized and easily accessible. Not only will the local liaison be required to produce documents in local audits and state monitoring visits, but these materials provide the historical context for your program, which can be passed along to the next liaison. Some liaisons have had the unfortunate experience of coming into the position with no records and documents available to them. If you were one of these liaisons, what documents do you wish you could have had to review when you started in the position? If you were a liaison who did inherit good records from your predecessor, what documents were the most helpful to you as a new liaison? Your answers are likely the documents that are now most important for you to keep on file.

Moreover, if records and documents are kept in an organized fashion, when your program is monitored, you will save a great deal of time in compiling materials, either in hard copy or electronically.

Documents specific to your state and LEA may include

- correspondence from the State Coordinator;
- state and local dispute resolution policies;
- forms and templates related to enrollment, written notice for dispute-related issues, and parent contracts;
- memoranda of agreement with local service providers and partners;
- data submitted to ED*Facts* for the Consolidated State Performance Reports;
- monitoring reports;
- contact information for community collaborators;
- Title I, Part A set-aside information;
- subgrant applications;
- needs assessments;
- records related to completed disputes and written notice provided to parents and youth;
- subgrant expenditure reports; and

- phone and email logs.

Phone and email logs, or barrier tracking logs, should include all calls from parents, administrators, and staff related to enrolling and serving homeless students. While many liaisons keep informal records of phone calls and email for a short period of time only, keeping these logs on file provides important information on what issues require more training, what policies should be changed, or which staff and schools have the greatest challenges. Barrier tracking logs are an important tool to assist you with prioritizing your activities and targeting time and resources where they are most needed. For a sample form, see Appendix 15.E Barrier Tracking Form.

Section 15.9 Useful Links

Title VII, Subtitle B of the McKinney-Vento Homeless Assistance Act (Education for Homeless Children and Youths)
42 U.S.C. §§ 11431-11434A
http://uscode.house.gov

National Center for Homeless Education: *Local Educational Agency Informal Needs Assessment*
https://nche.ed.gov/wp-content/uploads/2018/10/lea-needs-assess.docx

Covey, Stephen. (1989). *The 7 Habits of Highly Effective People*. NY, NY: Free Press.

Section 15.10 Resources and Tools for Chapter Fifteen

Appendix 15.A Template of Quadrants to Determine Priorities
Appendix 15.B Top Five List
Appendix 15.C School Level Point of Contact Information
Appendix 15.D Needs Assessment Worksheet and Summary
Appendix 15.E Sample Barrier Tracking Form

Chapter Sixteen: Related Legislation

Section 16.1 Connecting with Related Laws

The McKinney-Vento Act provides a strong foundation for serving homeless children and youth. However, other federal laws also specifically address the needs of homeless children and youths, providing additional rights and protections for this vulnerable population. Chapter 11: Collaboration includes strategies for working with other programs while this chapter explains key tenets of, and provides links to, the actual text of the other federal laws, guidance, and memos related to the education of homeless children and youth. This chapter also provides links to NCHE briefs that summarize the laws and offer good practices.

Section 16.2 Elementary and Secondary Education Act (ESEA), Title 1, Part A

Title I, Part A of the Elementary and Secondary Education Act (ESEA) as amended by the Every Student Succeeds Act (ESSA) is designed to meet the educational needs of low-achieving children in schools with the highest levels of poverty. Homeless students are part of the target population of disadvantaged students served by Title I, Part A and are automatically eligible for services under the program, whether or not they attend a Title I, Part A school or meet the academic standards required for other students to receive services. A summary of key pieces related to the education of students experiencing homelessness follows.

- Plans implemented by Title I, Part A as part of the LEA application must describe "the services the local educational agency will provide homeless children and youths, including services provided with funds reserved under section 1113(c)(3)(A) of this title to support the enrollment, attendance, and success of homeless children and youths, in coordination with the services the local educational agency is providing under the McKinney-Vento Act Homeless Assistance Act" [20 U.S.C. § 6312(b)(6)].

- Each LEA receiving Title I, Part A funds must reserve funds "as are necessary under this part … to provide services comparable to those provided to children in schools under this part to serve homeless children and youths, including providing educationally related support services to children in shelters and other locations where they may live" [20 U.S.C. § 6313(c)(3)(A)(i)].
- The funds reserved for homeless children and youths may be determined "based on a needs assessment of homeless children and youths in the local educational agency, taking into consideration the number and needs of homeless children and youths in the local educational agency, and which needs assessment may be the same needs assessment as conducted under section 11433(b)(1) of title 42" (for McKinney-Vento subgrants) [20 U.S.C. § 6313(c)(3)(C)(i)].
- The funds reserved for homeless children and youths may be "used to provide homeless children and youths with services not ordinarily provided to other students under this part" including providing funding for the homeless liaison and transportation to and from the school of origin [20 U.S.C. § 6313(c)(3)(C)(ii))].
- The U.S. Department of Education (ED) *Non-Regulatory Guidance for the Education for Homeless Children and Youths* program states that "Title I, Part A funds may be used to provide services to homeless children and youths, including those in Title I schools, that may not ordinarily be provided to other Title I students." (U.S. Department of Education, p. 38). See text box on page 16-3 for a list of allowable expenses provided in the Guidance.

Allowable Title I, Part A Expenditures for Supporting Homeless Students

Non-Regulatory Guidance for the Every Student Succeeds Act (ED, 2016) notes several items or services as allowable Title I, Part A expenditures, including, but not limited to:

- Items of clothing, particularly if necessary to meet a school's dress or uniform requirement
- Clothing and shoes necessary to participate in physical education classes
- Student fees that are necessary to participate in the general education program
- Personal school supplies such as backpacks and notebooks
- Birth certificates necessary to enroll in school
- Immunizations
- Food
- Medical and dental services
- Eyeglasses and hearing aids
- Counseling services to address anxiety related to homelessness that is impeding learning
- Outreach services to students living in shelters, motels, and other temporary residences
- Extended learning time (before- and after-school, Saturday classes, summer school) to compensate for lack of quiet time for homework in shelters or other overcrowded living conditions
- Tutoring services, especially in shelters or other locations where homeless students live
- Parental involvement specifically oriented to reaching out to parents of homeless students
- Fees for Advanced Placement and International Baccalaureate testing*
- Fees for SAT or ACT testing*
- Fees for GED testing of school-aged students

* NCHE does not recommend using McKinney-Vento subgrant funds or Title IA set-aside funds to pay for AP exams, college entrance exams, or college application fees, because there are waivers available to cover these for homeless students.

Section 16.2.1 Resources Related to Title I, Part A

NCHE Issue Brief: ***Serving Students Experiencing Homelessness under Title I, Part A***
https://nche.ed.gov/wp-content/uploads/2018/10/titlei.pdf

Title I, Part A of the ESEA, 20 U.S.C. § 6301 et seq.
https://www2.ed.gov/programs/titleiparta/legislation.html

U.S. Department of Education
Education for Homeless Children and Youths Program Non-Regulatory Guidance
https://www2.ed.gov/policy/elsec/leg/essa/160240ehcyguidanceupdated082718.docx

Section 16.3 Child Nutrition and the WIC Reauthorization Act of 2004

The Child Nutrition and WIC Reauthorization Act of 2004 amends the Richard B. Russell National School Lunch Act (NSLA) and the Child Nutrition Act (CNA) of 1966 and established that certain homeless, runaway, and migrant children are categorically eligible for free meal benefits under the National School Lunch and School Breakfast Programs. These students and families do not have to complete an application for free meals. Rather, U.S. Department of Agriculture (USDA) policies allow for automatic enrollment of these students to ensure they receive meals quickly.

To expedite the enrollment of homeless students in the free meals programs, liaisons should provide the following information to the program's administrator:

- the student's name or a list of student names,
- the effective date of the homelessness,
- a signature from the local liaison or the director of a homeless shelter where the student resides to indicate the validity of the information.

Once a child is certified as eligible to receive free school meals, eligibility remains in effect for the duration of the current school year and for up to 30 days after the first operating day of the subsequent school year, or until a new eligibility determination is made in the new school year, whichever comes first.

Section 16.3.1 Resources Related to Child Nutrition

Child Nutrition and WIC Reauthorization Act of 2004 https://nche.ed.gov/child-nutrition/
USDA Interim Rule: ***Direct Certification and Certification of Homeless, Migrant, and Runaway Children for Free School Meals*** **(2011)** https://www.fns.usda.gov/school-meals/fr-042511ht
USDA Memorandum: ***Duration of Households' Free and Reduced Price Meal Eligibility Determination*** https://fns-prod.azureedge.net/sites/default/files/2004-07-07.pdf
USDA Memorandum: ***Guidance on Determining Categorical Eligibility for Free Lunches and Breakfasts for Youth Served under the Runaway and Homeless Youth Act*** https://nche.ed.gov/wp-content/uploads/2018/11/usda_guidance_sept04.pdf
NCHE Issue Brief: ***Access to Food for Homeless and Highly Mobile Students*** https://nche.ed.gov/wp-content/uploads/2018/10/nutrition.pdf

Section 16.4 The Family Educational Rights and Privacy Act

The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g and 34 C.F.R. Part 99) is a federal law that protects the privacy of student education records. The law directly applies to all educational agencies or institutions that receive funds under an applicable program administered by the Secretary of the U.S. Department of Education.

FERPA gives parents certain rights with respect to their children's education records. These rights transfer to the student—termed an eligible student—when the student reaches the age of 18 years or attends an institution of postsecondary education. Parents and eligible students generally have the right to inspect and review the student's education records, the right to seek to have the education records amended, the right to have some control over the disclosure of personally identifiable information (PII) from the education records, and the right to file a written complaint with the Family Policy Compliance Office of the Department of Education regarding an alleged violation of FERPA.

Generally, educational agencies or institutions must have written permission from the parent or eligible student in order to release any PII from a student's education record. Under FERPA, however, educational agencies and institutions may disclose students' education records or PII contained therein, without

consent, under certain exceptions to the requirement of consent, which include, but are not limited to, the following:

- school officials with legitimate educational interests, subject to criteria that an educational agency or institution must set forth for who constitutes school officials with legitimate educational interests in the annual notification of FERPA rights and under the conditions set forth in the FERPA regulations at 34 C.F.R. § 99.31(a)(1);
- other schools and school systems to which a student seeks or intends to enroll or is transferring, subject to the conditions set forth in the FERPA regulations at 34 C.F.R. § 99.31(a)(2) and § 99.34;
- specified officials for audit or evaluation purposes, subject to the conditions set forth in the FERPA regulations at 34 C.F.R. § 99.31(a)(3) and § 99.35;
- in connection with financial aid for which the student has applied or which the student has received if the information is necessary for such purposes as to determine the eligibility for the aid, determine the amount of the aid, determine the conditions of the aid, or enforce the terms and conditions of the aid;
- organizations conducting certain studies for or on behalf of the educational agency or institution, subject to the conditions set forth in the FERPA regulations at 34 C.F.R. § 99.31(a)(6);
- accrediting organizations to carry out their accrediting functions;
- appropriate parties in connection with health and safety emergencies, subject to the conditions set forth in the FERPA regulations at 34 C.F.R. § 99.36;
- state and local officials or authorities to whom information is specifically allowed to be reported or disclosed pursuant to State statute if the information concerns the juvenile justice system and, depending on whether the State statute was adopted before or after November 19, 1974, subject to the conditions set forth in the FERPA regulations at either 34 C.F.R. § 99.31(5)(i)(A) or § 99.38; and
- to comply with a judicial order or lawfully issued subpoena, subject to the conditions set forth in the FERPA regulations at 34 C.F.R. § 99.31(a)(9).

If a district did not include information about its intent to release information under the circumstances listed above, the district must make reasonable attempts to notify the parents or guardians prior to the release of the information.

Educational agencies and institutions also may disclose, without consent, directory information such as a student's name, address, telephone number, date and place of birth, honors and awards, and dates of attendance. However,

educational agencies and institutions must provide public notice to parents and eligible students about the items of information that they have designated as directory information and allow parents and eligible students a reasonable amount of time to request that the educational agency or institution not disclose such directory information about them. Educational agencies and institutions must notify parents and eligible students annually of their rights under FERPA. The actual means of notification (e.g., special letter, inclusion in a Parent Teacher Association bulletin, student handbook, or newspaper article) is left to the discretion of each agency or institution.

Section 16.4.1 Resources Related to FERPA

Family Educational Rights and Privacy Act, 20 U.S.C. § 1232(g)
https://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html

Family Policy Compliance Office, U.S. Department of Education
FERPA information
http://www2.ed.gov/policy/gen/guid/fpco/index.html

Section 16.5 Individuals with Disabilities Education Act (IDEA)

The purpose of Part B of IDEA is to ensure that all children with disabilities have available to them a free appropriate public education (FAPE) that emphasizes special education and related services designed to meet their unique needs and prepare them for further education, employment, and independent living [20 U.S.C. § 1400(d)(1)(A)]. Under Part B of IDEA, Federal funds are made available to States, and through them to local school districts, to assist in providing special education and related services to eligible children with disabilities [20 U.S.C. § 1411]. A child's entitlement to FAPE begins at a child's third birthday and could last to the 22nd birthday depending on State law or practice [20 U.S.C. § 1412(a)(1)].

The 2004 reauthorization of IDEA includes amendments that reinforce provisions in both the McKinney-Vento Act and the earlier version of IDEA. These amendments clarify how Part B of IDEA applies to the education of students experiencing homelessness by addressing issues related to timely Child Find and evaluations, and continuity of services for children and youth with disabilities who experience homelessness and change school districts.

The following summarizes the IDEA Part B provisions for students experiencing homelessness and disabilities:

- IDEA includes a definition of homeless children that incorporates the McKinney-Vento Act's definition of homeless children and youth [20 U.S.C. § 1401(11)].
- Child Find requirements include a specific requirement that all States identify, locate, and evaluate children with disabilities who are homeless, regardless of the severity of their disability, and who are in need of special education and related services [20 U.S.C. § 1412(a)(3)(A)].
- Any state receiving Part B funds, in carrying out the requirements of Part B of IDEA, must ensure that the requirements of the McKinney-Vento Act are met for all homeless children and youth with disabilities in the state [20 U.S.C. § 1412(a)(11)(A)(iii)].
- LEAs must complete initial evaluations to determine if a child is a child with a disability as defined in IDEA and the educational needs of that child within 60 days of receiving parental consent for the evaluation, or if the state has established a timeframe within which the evaluation must be conducted, within that timeframe [20 U.S.C. § 1414(a)(1)(C)(i)].
- If a child changes LEAs while an evaluation is pending, the relevant timeframe for completion would not apply to an LEA if the child enrolls in a school of another LEA after the relevant timeframe has begun and prior to a determination by the child's previous LEA that the child is a child with a disability under IDEA. This exception would only apply if the new LEA is making sufficient progress to ensure prompt completion of the evaluation, and the parent and the new LEA agree to a specific time when the evaluation must be completed [20 U.S.C. § 1414(a)(1)(C)(ii)(I)].
- LEAs must ensure that assessments of children who change LEAs during the school year are coordinated with prior and subsequent schools as necessary and as expeditiously as possible, to ensure prompt completion of the evaluation [20 U.S.C. § 1414(b)(3)(D)].
- When children with Individualized Education Programs (IEPs) transfer into new LEAs during the school year, the new LEA is initially required to provide a free appropriate public education, including services comparable to those described in the child's previous IEP, in consultation with the parents. In the case of an in-state transfer, the new LEA adopts the child's previous IEP, or develops and implements a new IEP. In the case of an out-of-state transfer, the new LEA can conduct its own evaluation, if determined necessary, and develop a new IEP for the child, if appropriate [20 U.S.C. § 1414(d)(2)(C)(i)(I)].

- The definition of *parent* includes individuals acting in place of a biological or adoptive parent with whom the child lives as well as a properly appointed surrogate parent [20 U.S.C. § 1401(23)].
- For unaccompanied youth, LEAs must appoint surrogate parents and make reasonable efforts to complete the appointment process within 30 days of the determination that the youth needs a surrogate [20 U.S.C. § 1415(b)(2)]. In the interim, temporary surrogate parents must be appointed for unaccompanied youth. Temporary surrogates can be appropriate staff members of emergency shelters, transitional shelters, independent living programs, or street outreach programs. The requirement that a surrogate not be an employee of the SEA, LEA, or any other agency that is involved in the education or care of the child does not apply to individuals who can be appointed as temporary surrogates (34 C.F.R. § 300.519(f)].
- Any State receiving an IDEA Part C grant must make early intervention services available to homeless infants and toddlers with disabilities and their families [20 U.S.C. §1434(i)].

Section 16.5.1 Resources Related to the IDEA

Individuals with Disabilities Education Act (2004) **https://sites.ed.gov/idea/**
NCHE Issue Brief: ***Supporting Homeless Children and Youth with Disabilities: Legislative Provisions in the McKinney-Vento Act and the Individuals with Disabilities Education Act*** **https://nche.ed.gov/wp-content/uploads/2018/10/idea.pdf**
U.S. Department of Education ***Questions and Answers on Special Education and Guidance*** **https://www2.ed.gov/policy/speced/guid/spec-ed-homelessness-q-a.pdf**

Section 16.6 The Runaway and Homeless Youth Act (RHYA)

The Runaway and Homeless Youth Act (RHYA), also referred to as the Runaway and Homeless Youth Program (RHYP), was most recently authorized through the Juvenile Justice Reform Act of 2018 (34 U.S.C. § (I)(111)(III)). The RHYA enables community-based organizations and shelters to serve and protect runaway, homeless, missing, and sexually exploited youth. It supports funding for Basic Center programs, which provide emergency shelters; Transitional Living

Programs, which offer longer-term care that helps prepare older youth for self-sufficiency and adulthood; and Street Outreach programs to serve youth on the streets.

Programs are required to increase access to education for youth and coordinate with McKinney-Vento local liaisons (P.L. 115-385 §s 11212 and 11222).

Section 16.6.1 Resources Related to the Runaway and Homeless Youth Program

Runaway and Homeless Youth Program **https://www.acf.hhs.gov/fysb/resource/rhy-act**
U.S. Department of Health and Human Services **Family and Youth Services Bureau** **Runaway and Homeless Youth Program** **https://www.acf.hhs.gov/programs/fysb/programs/runaway-homeless-youth/about**

Section 16.7 The College Cost Reduction and Access Act (CCRAA) of 2007

The Higher Education Act as amended by the College Cost Reduction and Access Act of 2007(CCRAA) includes specific provisions designed to remove barriers for unaccompanied homeless youth in accessing Federal financial aid for college. The Act enables these youths to be qualified as independent students for completing the Federal Application for Financial Student Aid, thereby removing the need for these youths to provide parental financial information and a parent signature.

Youth must be determined as unaccompanied and homeless, or as unaccompanied, at risk of homelessness, and self-supporting, during the school year in which they apply for aid. Determination of independent student status must be made by the

- LEA homeless education liaison;
- director or the director's designee of a U.S. Department of Housing and Urban Development emergency shelter program;
- director or the director's designee of a Runaway and Homeless Youth Act program; or
- college financial aid advisor [20 U.S.C. § 1087vv(d)(1)(H)].

Section 16.7.1 Resources Related to the CCRAA

College Cost Reduction and Access Act (CCRAA) of 2007
http://www.govtrack.us/congress/bills/110/hr2669/text

NCHE Issue Brief: ***Increasing Access to Higher Education for Unaccompanied Homeless Youth: Information for Colleges and Universities***
https://nche.ed.gov/wp-content/uploads/2018/10/higher_ed.pdf

Sample Form Letter to Determine the Independent Student Status of Unaccompanied Homeless Youth
https://www.schoolhouseconnection.org/sample-form-letter-to-determine-the-independent-student-status-of-unaccompanied-homeless-youth/

NCHE Higher Education webpage
https://nche.ed.gov/higher-education/

Section 16.8 Head Start

The Improving Head Start for School Readiness Act of 2007 reauthorized the Head Start program and included specific provisions on serving homeless children. Relevant to serving young homeless children, the Act:

- includes a definition of homelessness consistent with the McKinney-Vento Act [42 U.S.C. § 9832(11), 2011];
- specifies that homeless children are categorically eligible for Head Start services;
- allows Head Start agencies to serve some families with incomes up to 130% of the poverty line, but only if the agency implements procedures to meet the needs of homeless children and youth below the poverty line first [42 U.S.C. § 9840(1)(B), 2011]; and
- requires new applicants for Head Start grants to include a plan to meet the needs of homeless children and children in foster care, including transportation needs [42 U.S.C. § 9836(d)(2)(O), 2011].

The Head Start Act also requires the Secretary of the U.S. Department of Health and Human Services to issue regulations requiring programs to:

- ensure homeless children are identified and prioritized for enrollment;
- allow homeless families to apply to, enroll in, and attend Head Start programs while required documents are obtained within a reasonable time frame [42 U.S.C. § 9835(m), 2001];
- coordinate with individual Head Start centers and programs on efforts to implement the education provisions of the McKinney-Vento Act [42 U.S.C. § 9835(g)(1)(C), 2011].

Before receiving additional funds to expand their programs, existing Head Start grantees must show

- the extent to which applicants have undertaken community-wide strategic planning needs assessments involving the local liaison and organizations providing services to children in foster care, homeless children, child abuse prevention services, and protective services
- the extent to which applicants coordinate with local liaisons [42 U.S.C. § 9835(g)(1)(C), 2011].

Section 16.8.1 Resources Related to Head Start

Improving Head Start for School Readiness Act of 2007
https://eclkc.ohs.acf.hhs.gov/policy/head-start-act

Section 16.9 Child Care and Development Block Grant Act (CCDBGA)

The Child Care and Development Block Grant Act (CCDBGA) of 2014, reauthorized the Child Care and Development Fund (CCDF) Program which is designed to help low-income families pay for child care while a parent is employed or is participating in an educational or job training program. Specific provisions on serving homeless children in the CCDF Regulations (45 CFR Part 98), include:

- using the McKinney-Vento definition of homeless children;
- coordinating with State Coordinators for Homeless Education (and, to the extent practicable, with local homeless education liaisons) when developing state CCDF plans to ensure access to services for homeless children;

- allowing homeless families a grace period to comply with immunization and other health and safety requirements, while referring homeless families to agencies that can assist them in meeting these requirements;
- allowing differential payment rates to early care providers based on higher and costlier needs of particular children, including homeless children;
- requiring prioritization of homeless children for services;
- requiring procedures to permit the enrollment of homeless children while needed documentation is gathered;
- requiring training and technical assistance to Lead Agency staff and early care providers about identifying and serving homeless families; and
- requiring specific outreach to homeless families.

Section 16.9.1 Resources Related to Child Care and Development Block Grant Act (CCDBGA)

Child Care and Development Fund (CCDF)
https://www.acf.hhs.gov/occ/ccdf-reauthorization

CCDF Regulations
https://www.acf.hhs.gov/occ/resource/ccdf-final-regulations

U.S. Department of Health and Human Services' Child Care and Development (CCDF) Program: Final Rule
https://www.federalregister.gov/documents/2016/09/30/2016-22986/child-care-and-development-fund-ccdf-program

Section 16.10 Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009

The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 added new education-related requirements for Continuum of Care and homeless service grant applicants. Specifically, to receive funding, Continuum of Care programs must do the following:

- collaborate with local education authorities (school districts) to assist in the identification of homeless families and inform homeless families and youth of their eligibility for McKinney-Vento education services [42 U.S.C. § 11386a(b)(1)(B)(iii), 2009];

- consider the educational needs of children when families are placed in emergency or transitional shelter and, to the maximum extent practicable, place families with children as close as possible to their school of origin so as not to disrupt the children's education [42 U.S.C. § 11386(b)(7), 2009];
- establish policies and practices consistent with the McKinney-Vento Act and other laws relating to the provision of educational and related services to individuals and families experiencing homelessness (policies and practices must not restrict a youth's education rights) [42 U.S.C. §11386(b)(4)(C), 2009];
- designate a staff person to ensure that children are enrolled in school and connected to the appropriate services within the community, including early childhood programs such as Head Start, Part C of IDEA, and McKinney-Vento education services [42 U.S.C. § 11386(b)(4)(D), 2009). (This requirement only applies to programs providing housing or services to families or unaccompanied youth).

Section 16.10.1 Resources Related to the HEARTH Act

Homeless Emergency Assistance and Rapid Transition to Housing Act
https://www.hudexchange.info/homelessness-assistance/hearth-act/

NCHE Issue Brief: ***Housing and Education Collaborations to Serve Homeless Children, Youth, and Families***
https://nche.ed.gov/wp-content/uploads/2018/10/hud.pdf

Continuum of Care Contacts
https://www.hudexchange.info/grantees/contacts/

Section 16.11 Strengthening Career and Technical Education for the 21st Century Act

The Strengthening Career and Technical Education for the 21st Century Act (P.L. 115-224), also known as Perkins V, reauthorized the Perkins Career and Technical Education Act. It permits states, school districts, career and technical schools, and post-secondary institutions to operate CTE programs that offer students the knowledge, skills, and hands-on experience necessary to compete for well-paying, in-demand jobs in fields such as health care, agriculture, and technology.

Perkins V contains new provisions to help young people experiencing homelessness access and succeed in CTE programs, including designating

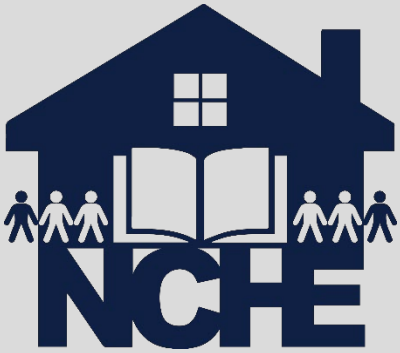
individuals experiencing homelessness, as defined by the McKinney-Vento Act, as one of nine special populations. These new provisions focus on addressing the needs of special populations in the areas of state and local plans, funding, and evaluation and accountability.

Section 16.11.1 Resources Related to Career and Technical Education (CTE)

Perkins Career and Technical Education Act
https://www2.ed.gov/policy/sectech/leg/perkins/index.html

NCHE Issue Brief: ***Supporting In-School and Out-of-School Youth Experiencing Homelessness Through Education and Workforce Partnerships***
https://nche.ed.gov/wp-content/uploads/2018/11/labor-ed-collab.pdf

Appendix



Appendix 2.A Homeless Liaison Responsibilities

Cited from the McKinney-Vento Homeless Assistance Act, as amended by the Every Student Succeeds Act (ESSA) in Title IX, Part A:

LOCAL EDUCATIONAL AGENCY LIAISON

(A) DUTIES - Each local educational agency liaison for homeless children and youths, designated under paragraph (1)(J)(ii), shall ensure that—

(i) homeless children and youths are identified by school personnel through outreach and coordination activities with other entities and agencies;

(ii) homeless children and youths are enrolled in, and have a full and equal opportunity to succeed in, schools of that local educational agency;

(iii) homeless families and homeless children and youths have access to and receive educational services for which such families, children, and youths are eligible, including services through Head Start programs (including Early Head Start programs) under the Head Start Act (42 U.S.C. 9831 et seq.), early intervention services under Part C of the Individual with Disabilities Education Act (20 U.S.C. 1431 et seq.), and other preschool programs administered by the local educational agency;

(iv) homeless families and homeless children and youths receive referrals to health care services, dental services, mental health and substance abuse services, housing services, and other appropriate services;

(v) the parents or guardians of homeless children and youths are informed of the educational and related opportunities available to their children and are provided with meaningful opportunities to participate in the education of their children;

(vi) public notice of the educational rights of homeless children and youths is disseminated in locations frequented by parents or guardians of such children and youths, and unaccompanied youths, including schools, shelters, public libraries, and soup kitchens, in a manner and form understandable to parents and guardians of homeless children and youths, and unaccompanied youths;

(vii) enrollment disputes are mediated in accordance with paragraph (3)(E); and

(viii) the parent or guardian of a homeless child or youth, and any unaccompanied youth, is fully informed of all transportation services, including transportation to the school of origin, as described in paragraph (1)(J)(iii), and is assisted in accessing transportation to the school that is selected under paragraph (3)(A);

(ix) school personnel providing services under this subtitle receive professional development and other support; and

(x) unaccompanied youths –

(I) are enrolled in school;

(II) have opportunities to meet the same challenging State academic standards as the State establishes for other children and youth, including through implementation of the procedures under paragraph (1)(F)(ii); and

(III) are informed of their status as independent students under section 480 of the Higher Education Act of 1965 (20 U.S.C. 1087vv) and that the youths may obtain assistance from the local educational agency liaison to receive verification of such status for purposes of the Free Application for Federal Student Aid described in section 483 of such Act (20 U.S.C. 1090).

(B) NOTICE - State Coordinators established under subsection (d)(3) and local educational agencies shall inform school personnel, service providers, and advocates working with homeless families, parents and guardians of homeless children and youths, and homeless children and youths of the duties of the local educational liaisons, and publish an annually updated list of the liaisons on the State educational agency's website.

(C) LOCAL AND STATE COORDINATION - Local educational agency liaisons for homeless children and youths shall, as part of their duties, coordinate and collaborate with State Coordinators and community and school personnel responsible for the provision of education and related services to homeless children and youths. Such coordination shall include collecting and providing to the State Coordinator the reliable, valid, and comprehensive data needed to meet the requirements of paragraphs (1) and (3) of subsection (f).

(D) HOMELESS STATUS. – A local educational agency liaison designated under paragraph (1)(J)(ii) who receives training described in subsection (f)(6) may affirm, without further agency action by the Department of Housing and Urban Development, that a child or youth who is eligible for and participating in a program provided by the local educational agency, or the immediate family of such a child or youth, who meets the eligibility requirements of this Act for a program or service authorized under title IV, is eligible for such program or service.

(42 U.S.C. § 11432(g)(6))

Appendix 2.B Quick Guide to Important Sections of the McKinney-Vento Act

You should read and revisit frequently the following definitions in the law:

Enrollment

The terms "enroll" and "enrollment": include attending classes and participating fully in school activities. (42 U.S.C. § 11434a(1)).

Homeless

The term "homeless children and youths"—

(A) means individuals who lack a fixed, regular, and adequate nighttime residence …; and

(B) includes—

(i) children and youths who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; or are abandoned in hospitals;

(ii) children and youths who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings…;

(iii) children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and

(iv) migratory children … who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (i) through (iii). (42 U.S.C. § 11434a(2)).

Unaccompanied Youth

The term "unaccompanied youth" includes a homeless child or youth not in the physical custody of a parent or guardian. (42 U.S.C. § 11434a(6)).

School of Origin

The term "school of origin" means the school that a child or youth attended when permanently housed or the school in which the child or youth was last enrolled, including a preschool. (42 U.S.C. § 11432(g)(3)(I)(i)).

Receiving School

When the child or youth completes the first grade level served by the school of origin, as described in clause (i), the term "school of origin" shall include the designated receiving school at the next grade level for all feeder schools. (42 U.S.C. § 11432(g)(3)(I)(ii)).

In addition, you should be very familiar with sections of the law on:

School Enrollment

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; and

(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. (42 U.S.C. § 11432(g)(3)(A)).

School Stability

In determining the best interest of the child or youth under subparagraph (A) [cited above], the local educational agency shall—

(i) presume that keeping the child or youth in the school of origin is in the child's or youth's best interest, except when doing so is contrary to the request of the child's or youth's parent or guardian, or (in the case of an unaccompanied youth) the youth;

(ii) consider student-centered factors related to the child's or youth's best interest, including factors related to the impact of mobility on

achievement, education, health, and safety of homeless children and youth, giving priority to the request of the child's or youth's parent or guardian or (in the case of an unaccompanied youth) the youth; … (42 U.S.C. § 11432(g)(3)(B)).

Immediate Enrollment

The school selected in accordance with this paragraph shall immediately enroll the homeless child or youth, even if the child or youth—

(I) is unable to produce records normally required for enrollment, such as previous academic records, records of immunization or other required health records, proof of residency, or other documentation; or

(II) has missed application or enrollment deadlines during any period of homelessness. (42 U.S.C. § 11432(g)(3)(C)).

Transportation to the School of Origin

The State and the local educational agencies in the State will adopt policies and practices to ensure that transportation is provided, at the request of the parent or guardian (or in the case of an unaccompanied youth, the liaison), to and from the school of origin… in accordance with the following, as applicable:

(I) If the child or youth continues to live in the area served by the local educational agency in which the school of origin is located, the child's or youth's transportation to and from the school of origin shall be provided or arranged by the local educational agency in which the school of origin is located.

(II) If the child's or youth's living arrangements in the area served by the local educational agency of origin terminate and the child or youth, though continuing the child's or youth's education in the school of origin, begins living in an area served by another local educational agency, the local educational agency of origin and the local educational agency in which the homeless child or youth is living shall agree upon a method to apportion the responsibility and costs for providing the child or youth with transportation to and from the school of origin. If the local educational agencies are unable to agree

upon such method, the responsibility and costs for transportation shall be shared equally. (42 U.S.C. § 11432(g)(1)(J)(iii)).

Segregation and Stigmatization

The State educational agency and local educational agencies in the State will adopt policies and practices to ensure that homeless children and youths are not stigmatized or segregated on the basis of their status as homeless. (42 U.S.C. § 11432(g)(1)(J)(i)).

Appendix 2.C Understanding My LEA's Homeless Education Program

Question	Source	Notes
Who is the State Coordinator for the homeless education program in my state? What technical assistance and training does the State Coordinator provide to LEAs?	NCHE Website; SEA Homeless Education Website	
How much time is allocated to the local liaison position? What additional staff support is in place?	Supervisor	
How many homeless children and youth did the LEA identify last year?	LEA Data Manager	
Are the numbers identified increasing or decreasing? By how much?	LEA Data Manager	
Does the LEA have a McKinney-Vento subgrant? If so, what are the approved activities to serve homeless children and youth? What are my reporting responsibilities? How long will the LEA receive funds through this grant?	McKinney-Vento Subgrant Application	

Question	Source	Notes
How much money is set aside for services for homeless children and youth through Title I, Part A? How was the amount of these funds determined? On what were these funds spent last year? How may they be accessed?	Title I Coordinator, Consolidated Application	
What are the challenges to implementing the McKinney-Vento program in the LEA?	Phone and Email Logs, Documentation on Disputes	
What local policies and procedures are in place to support services for homeless children and youth? What policies or procedures create barriers to the education of homeless children and youth?	LEA Policy Handbook, School Board Policies, Phone and Email Logs, Documentation on Disputes, LEA Program Coordinators (Tutoring Programs, Nutrition, Special Education, English Language Learning, Migrant)	
What data must be collected on homeless children and youth, and what procedures are in place to collect and report this data?	State Coordinator, LEA Data Coordinator	
How many homeless children and youth were transported to their school of origin in the past year? What are the procedures for arranging transportation?	Pupil Transportation Director, Student Files	

Question	Source	Notes
What McKinney-Vento compliance issues have been identified in my district?	SEA Monitoring Reports	
What is the local dispute process for the McKinney-Vento program, and who is involved in the process other than the liaison?	Written Dispute Policy	
What homeless education awareness activities have taken place in the LEA? What role groups have been involved? Were the activities effective?	Meeting Agendas and Notes	
Who are the primary community agencies collaborating to serve homeless children and youth?	Meeting Agendas and Notes, Phone and Email Logs	
Are posters on McKinney-Vento services displayed in all schools? When was the last time posters and other awareness materials were placed in each school in the LEA?	Observation in Schools, Budget or Fiscal Office	

Appendix 3.A Sample Housing Information Form

Your answers will help determine if the student meets eligibility requirements for services under the McKinney-Vento Act.

Student _____ Parent/Guardian _____

School _____ Phone _____

Age _____ Grade _____ D.O.B. _____

Address _____ City _____

Zip Code _____ Is this address Temporary or Permanent? (circle one)

Please choose which of the following situations the student currently resides in (you can choose more than one):
_____ House or apartment with parent or guardian
_____ Motel, car, or campsite
_____ Shelter or other temporary housing
_____ With friends or family members (other than or in addition to parent/guardian)

If you are living in shared housing, please check all of the following reasons that apply:
_____ Loss of housing
_____ Economic situation
_____ Temporarily waiting for house or apartment
_____ Provide care for a family member
_____ Living with boyfriend/girlfriend
_____ Loss of employment
_____ Parent/Guardian is deployed
_____ Other (Please explain)

Are you a student living apart from your parents or guardians? Yes No

Housing and Educational Rights

Students without fixed, regular, and adequate nighttime residences have the following rights:

1) Immediate enrollment in the school they last attended or the local school where they are currently staying even if they do not have all of the documents normally required at the time of enrollment without fear of being separated or treated differently due to their housing situations;
2) Transportation to the school of origin for the regular school day;
3) Access to free meals, Title I and other educational programs, and transportation to extra-curricular activities to the same extent that it is offered to other students.

Any questions about these rights can be directed to the local McKinney-Vento liaison at [Insert phone number] or the State Coordinator at [Insert phone number].

By signing below, I acknowledge that I have received and understand the above rights.

_____

Signature of Parent/Guardian/UHY Youth *Date*

_____

Signature of McKinney-Vento Liaison/ *Date*

Appendix 4.A Legal Definition of Homelessness

Subtitle VII-B of the McKinney-Vento Homeless Assistance Act states the following:

> The term "homeless children and youths"—
>
> (A) means individuals who lack a fixed, regular, and adequate nighttime residence (within the meaning of section 103 (a)(1)); and
>
> (B) includes—
>
> (i) children and youths who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; or are abandoned in hospitals[1];
>
> (ii) children and youths who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings (within the meaning of section 103 (a)(2)(C));
>
> (iii) children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and
>
> (iv) migratory children (as such term is defined in section 1309 of the Elementary and Secondary Act of 1965) who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (i) through (iii). (42 U.S.C. § 11434a(2)).

[1] Awaiting foster care placement provisions expired in December of 2016 or 2017, depending on a state's status as covered.

Appendix 6.A School Selection Checklist for Decision Making

(Adapted from the Texas Homeless Education Office)

School of Origin Considerations	Local Attendance Area School Considerations
☐ Continuity of Instruction *Student is best served due to circumstances that look to his or her past.*	☐ Continuity of Instruction *Student is best served due to circumstances that look to his or her future.*
☐ Age and Grade Placement of the Student *Maintaining friends and contacts with peers is critical to the student's meaningful school experience and participation. The student has been in this environment for an extended period of time*	☐ Age and Grade Placement of the Student *Maintaining friends and contacts with peers in the school of origin is not particularly critical to the student's meaningful school experience and participation. The student has attended the school of origin for only a brief time.*
☐ Academic Strength *The child's academic performance is weak, and the child would fall further behind if he/she transferred to another school.*	☐ Academic Strength *The child's academic performance is strong and at grade level; the child would likely recover academically from a school transfer.*
☐ Social and Emotional State *The child is suffering from the effects of mobility, has developed strong ties to the current school, and does not want to leave.*	☐ Social and Emotional State *The child seems to be coping adequately with mobility, does not feel strong ties to the current school, and does not mind transferring.*
☐ Distance of the Commute and Its Impact *The advantages of remaining in the school of origin outweigh any potential disadvantages presented by the length of the commute.*	☐ Distance of the Commute and Its Impact *A shorter commute may help the student's concentration, attitude, or readiness for school. The local attendance area school can meet all of the necessary educational and special needs of the student.*
☐ Personal Safety of the Student *The school of origin has advantages for the safety of the student.*	☐ Personal Safety of the Student *The local attendance area school has advantages for the safety of the student.*
☐ Student's Need for Special Instruction *The student's need for special instruction, such as Section 504 or special education and related services, can be better met at the school of origin.*	☐ Student's Need for Special Instruction *The student's need for special instruction, such as Section 504 or special education and related services, can be met at the local attendance area school.*
☐ Length of Anticipated Stay *The student's current living situation is outside of the school of origin's attendance zone, but the living situation continues to be uncertain. The student will benefit from the continuity offered by remaining in the school of origin.*	☐ Length of Anticipated Stay *The student's current living situation appears stable and unlikely to change suddenly; the student will benefit from the developing relationships with peers in school who live in the local community.*

Appendix 7.A Transportation Memorandum of Understanding

[Insert School District Name]

TRANSPORTATION MEMORANDUM OF UNDERSTANDING

Dear Parent/Guardian/Unaccompanied Youth,

Your child(ren) or you, as an unaccompanied homeless youth, are currently eligible for services through the McKinney-Vento program. Per the McKinney-Vento Homeless Assistance Act, transportation will be provided to your child(ren) or you, as an unaccompanied youth, to and from school.

The following describes our agreement with you regarding transportation:

Pick-Up
Students must be at the bus stop or selected location at the time provided by the transportation department. Drivers can wait no more than [X] minutes from your scheduled time.

Drop-Off
An adult pre-approved by parents and guardians must be present at the bus stop or selected location to pick-up students too young to be left unsupervised. The transportation department will provide the time that the adult must be present for pick-up of students; parents and guardians must notify the liaison or the transportation department if an adult other than the parent or guardian will be picking up the student.

Communication of Absences
If a student is going to be absent from school and therefore does not need transportation for part or all of a day, parents or guardians must call and inform the designated driver no later than [X] a.m. on the day of the absence so the driver can adjust the route accordingly.

Driver's Name: [Insert]
Contact Phone Number: [Insert]

Behavioral Expectations
Students and parents are expected to follow the [Insert District Name] policies for student behavior. Disciplinary actions for students who violate the behavior policies will be followed as they are for any student in the district.

If [Insert District Name] fails to provide the agreed upon transportation services, the liaison should be contacted. Your liaison is [Insert Name] and may be reached at [Insert Contact Info].

If a student's residence changes, the transportation department must be contacted by [Insert Time] to allow for transportation to be arranged. Transportation requests and changes may take up to [insert number] days to be routed, so temporary transportation may be provided while routing is arranged. The transportation department may be contacted at: [insert info].

Please sign below to acknowledge that you understand and agree with these expectations and terms.

Date	Parent/Guardian/UHY Name (Printed)	Signature

Date	Name of Liaison (Printed)	Signature

Appendix 8.A Written Notification of Decision

This form is to be completed by the school when a disagreement arises between the school and a parent, guardian, or unaccompanied youth over McKinney-Vento eligibility, school selection, or enrollment in a school.

Date: _____

Name of person completing form: _____

Title of person completing form: _____

Name of school: _____

In compliance with 42 U.S. C. § 11432(g)(3)(E) of the McKinney-Vento Homeless Assistance Act, the following written notification is provided to:

Name of Parent(s)/Guardian(s): _____

Name of Student(s): _____

After reviewing your request regarding eligibility, or school selection, or enrollment in a school for the student(s) listed above, the request is denied. This determination was based upon:

You have the right to appeal this decision by completing the second page of this form or by contacting the school district's local homeless education liaison.

Name of local liaison: _____

Phone number: _____ Email:_____

In addition:

- The student listed above has the right to enroll immediately in the requested school pending the resolution of the dispute.
- You may provide written or verbal communication(s) to support your position regarding the student's enrollment in the requested school. You may use the form attached to this notification.
- You may contact the State Coordinator for Homeless Education if further help is needed or desired. Contact information for the State Coordinator:
- You may seek the assistance of advocates or an attorney. A copy of our state's dispute resolution process for students experiencing homelessness is attached.

Written Notification of Decision

To be completed by the parent, guardian, or unaccompanied youth when a dispute arises. This information may be shared verbally with the local liaison as an alternative to completing this form.

Date:

_____

Student(s):

_____

Person completing form:

_____

Relation to student(s):

_____

I may be contacted at (phone or e-mail):

_____

I wish to the appeal the enrollment decision made by:

_____

Name of School:

_____

I have been provided with (please check all that apply):

_____ A written explanation of the school's decision.

_____ The contact information of the school district's local homeless education liaison.

_____ A copy of the state's dispute resolution process for students experiencing homelessness.

Optional: You may include a written explanation in the space below to support your appeal or you may provide your explanation verbally.

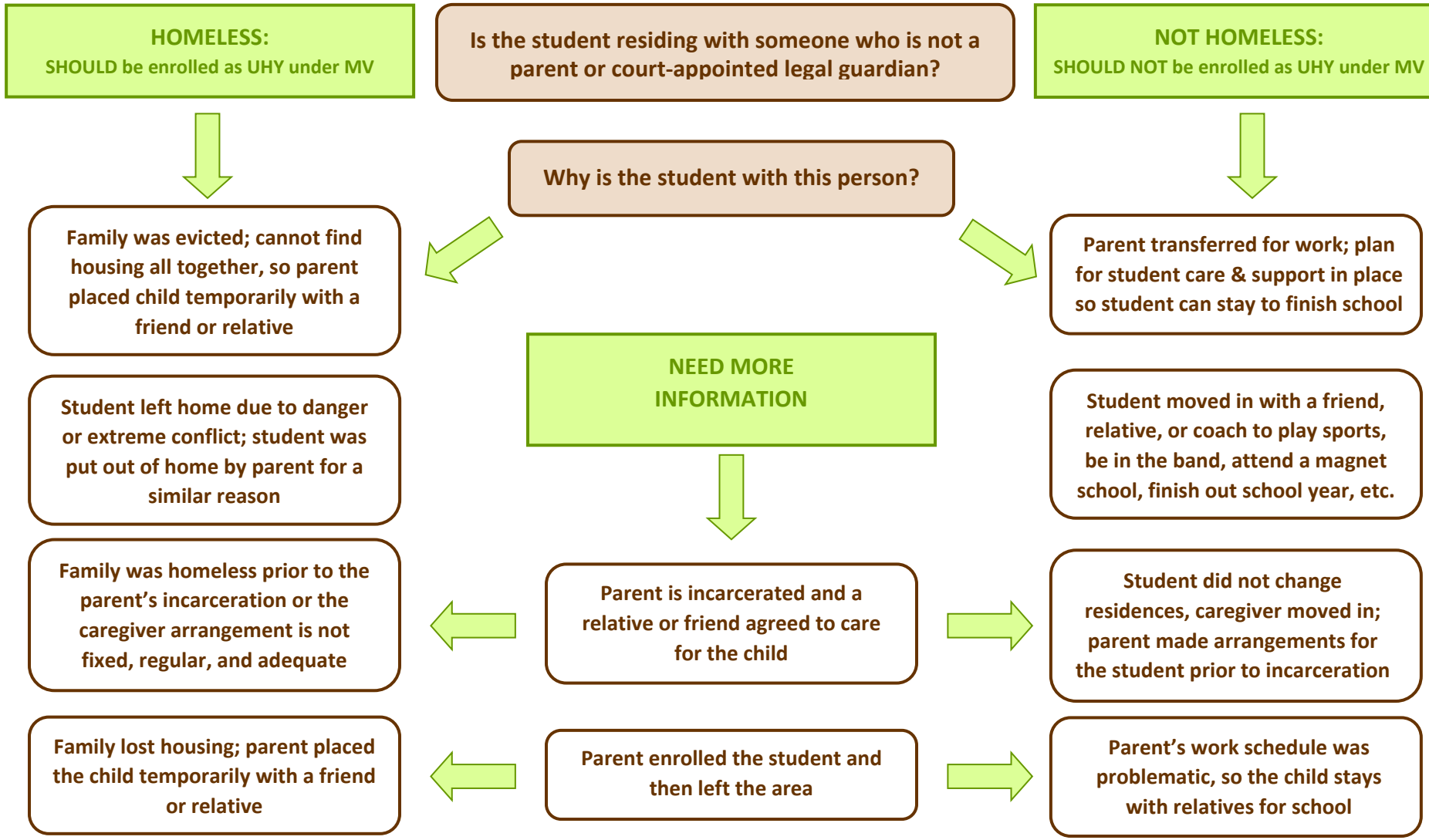
The school provided me with a copy of this form when I submitted it. _____
(Please initial.)

Appendix 8.B Dispute Review Guide

Case Name:
Date Initiated:
Date Resolved:
Summary of Dispute:
Resolution:

Before			
Issue	✓	What Went Well	What Needs Improvement
All school and LEA staff were trained on the McKinney-Vento Act.			
The local homeless liaison was familiar with the State and local homeless dispute resolution policy.			
All school and LEA staff were trained on what is required when a parent, guardian, or unaccompanied youth initiates a dispute.			
Timelines were clear and reasonable.			
The written notice was reviewed for appropriateness.			
School and LEA staff were trained in ways to diffuse disagreements and to treat parents, guardians, and unaccompanied youth respectfully.			
The local liaison implemented the dispute process according to LEA and SEA policies.			

Appendix 9.A Unaccompanied Youth Eligibility



NOTE: The information contained in this flowchart is intended to serve as a general guide. All McKinney-Vento eligibility determinations should be made on a case-by-case basis weighing the individual circumstances of each student. To be eligible for McKinney-Vento services as an unaccompanied homeless student, the student must meet the criteria of both homeless and unaccompanied.

Appendix 10.A Suggested Guidelines for a Parent Agreement

Parents experiencing homelessness often struggle with having "one more thing" added to their plate, and in the face of chaotic circumstances may be unable to carry out responsibilities or follow through on tasks in an organized fashion. A written agreement is a tool designed to enable parents to address an educational challenge for their children and understand their own responsibilities as well as those of the school and the local educational agency (LEA).

When a school or LEA needs to establish a written agreement with a homeless parent, the local liaison should develop the agreement in consultation with the parent. The intent of such agreements is to clarify expectations and responsibilities of the school and the parent while providing a helpful structure to hold both parties accountable. The school or LEA should offer support and encouragement to parents in carrying out the agreement, while also taking steps to ensure the regular attendance and participation of the student, in keeping with the student's best interest, should the parent not follow through with his or her part.

An effective parent agreement is one that includes:

1. A clear statement of the challenge under consideration that is impacting a child's education, such as irregular attendance or lack of homework completion.
2. A description of the responsibilities and activities the school or school district will undertake to address the challenge including specific activities and a timeline with start and end date.
3. A description of the responsibilities and activities the parent must undertake to address the challenge including specific activities and a timeline with start and end date.
4. A description of what the school or LEA will do if the parent does not carry out the responsibilities or activities.
5. A description of what recourse the parent has if the school does not carry out its responsibilities.
6. Signatures from the school or LEA staff member and the parent indicating that they agree to follow the terms of the agreement.

Appendix 11.A. McKinney-Vento Act Provisions and Guidance Related to Collaboration

McKinney-Vento Act Excerpts

Local and State Coordination

Local educational agency liaisons for homeless children and youths shall, as a part of their duties, coordinate and collaborate with State Coordinators and community and school personnel responsible for the provision of education and related services to homeless children and youths. (42 U.S.C. § 11432(g)(6)(C)])

Coordination

(A) IN GENERAL - Each local educational agency serving homeless children and youths…shall coordinate—

(i) the provision of services under this subtitle with local social services agencies and other agencies or entities providing services to homeless children and youths and their families, including services and programs funded under the Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq.); and

(ii) transportation, transfer of school records, and other interdistrict activities, with other local educational agencies.

(B) HOUSING ASSISTANCE - If applicable, each State educational agency and local educational agency that receives assistance under this subtitle shall coordinate with State and local housing agencies responsible for developing the comprehensive housing affordability strategy described in section 105 of the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. 12705) to minimize educational disruption for children and youths who become homeless.

(C) COORDINATION PURPOSE - The coordination required under subparagraphs (A) and (B) shall be designed to—

(i) ensure that all homeless children and youths are promptly identified;

(ii) ensure that all homeless children and youths have access to, and are in reasonable proximity to, available education and related support services; and

(iii) raise the awareness of school personnel and service providers of the effects of short-term stays in a shelter and other challenges associated with homelessness. (42 U.S.C. § 11432(g)(5)).

McKinney-Vento Non-Regulatory Guidance Excerpts

F-1. Local liaisons must ensure that: …

- Homeless children and youths are identified by school personnel through outreach and coordination activities with other entities and agencies…
- Homeless families and homeless children and youths have access to and receive educational services for which such families, children and youths are eligible, including services through Head Start programs (including Early Head Start programs), early intervention services under Part C of the IDEA, and other preschool programs administered by the LEA (U.S. Department of Education, 2018, p. 16);

F-4. What are some steps that LEAs can take to ensure all homeless students are identified?

…

- ***Interagency Collaboration***. Developing interagency partnerships. Some Federal programs are also required to identify and serve homeless children and youths who meet the eligibility criteria for those programs and to coordinate with LEAs. These programs include Head Start; the IDEA, which includes child find requirements for children with disabilities from birth through 21 (Part B) and child find requirements for infants and toddlers with disabilities from birth through age two (Part C); and housing programs funded by the U.S. Department of Housing and Urban Development (HUD); and programs and services funded under the Runaway and Homeless Youth Act. Local liaisons should contact the agencies responsible for administering these programs and discuss ways to coordinate referrals for homeless families with children and for unaccompanied homeless youths. A coordinated approach to serving homeless families and youths, potentially including a memorandum of agreement, will improve the identification of homeless students and help these agencies meet their Federal requirements (U.S. Department of Education, 2018, p. 18).

L-1. What education, homeless assistance, and social service programs should be considered as part of State and LEA coordination duties under the McKinney-Vento Act?

Many of the Department's programs use the McKinney-Vento Act definition of "homeless children and youths" and have parallel coordination requirements with the McKinney-Vento program. Of those, the main programs are Title I, Part A of the ESEA, and IDEA Parts B and C for children with disabilities ages three through 21 and birth through two, respectively. In the postsecondary education context, the College Cost Reduction Act amendments to the Higher Education Act (HEA) also authorize local liaisons to verify the unaccompanied youth status for the purpose of applying for independent student status below the age of 24 on the Free Application for Federal Student Aid (FAFSA).

Several Federal programs administered by the U.S. Department of Agriculture (USDA) and the U.S. Department of Health and Human Services (HHS) use the McKinney-Vento Act's definition of "homeless children and youths" …, so it is important for State Coordinators and local liaisons to coordinate for several reasons: to determine eligibility consistently across agencies serving the same families, children, and youths; to coordinate or expedite referrals for services; and to coordinate services overall for families or youths in order to improve education and other outcomes for homeless children and youths.

While programs administered by other Federal agencies may use different definitions of "homeless," many of these programs serve at least some of the population eligible for McKinney-Vento services. Coordination is critical to ensure homeless students have access to services, besides education, to address their basic needs, such as housing and health. Therefore, State Coordinators and local liaisons should develop relationships with their agency counterparts in order to create an expedited referral system. These relationships can also be used to help develop a more detailed understanding of the needs of the homeless population and a more effective system for serving homeless youths by sharing and using data. State Coordinators and local liaisons may work with their agency counterparts to set up interagency agreements for sharing relevant data to use for planning, coordination, and evaluation. Such agreements must be consistent with FERPA, the confidentiality of information provisions in Parts B and C of the IDEA, and other relevant Federal and State laws protecting the privacy of student and family information (U.S. Department of Education, 2018, p. 36).

References

U.S. Department of Education. (2018). *Education for Homeless Children and Youths Program Non-Regulatory Guidance.* https://www2.ed.gov/policy/elsec/leg/essa/160240ehcyguidanceupdated082718.docx

Appendix 11.B Collaborations Required by Law

The McKinney-Vento Act names several collaborative partners, either by program name or by general description (e.g., local housing agencies), with which local liaisons must work to meet the needs of homeless children and youth. Information about those partners, the laws that authorize their activities and collaborations, and descriptions of services they offer are listed below.

National School Meals Programs

Legal Authority: National School Lunch Act, 42 U.S.C. § 1751 et seq.

This Act establishes that homeless children are categorically eligible for free meal benefits under the National School Lunch and School Breakfast Programs. These students and families do not have to complete an application for free meals. Rather, USDA policies allow for expedited enrollment of these students to ensure they receive meals quickly. More information, including related USDA memos, is available at https://nche.ed.gov/child-nutrition/ and https://www.fns.usda.gov/cn.

Head Start

Legal Authority: Head Start Act, 42 U.S.C. § 9801 et seq.
Related Regulations: 45 C.F.R. § 1301 et seq.

The Head Start program offers grants to public and private nonprofit and for-profit agencies to provide comprehensive child development services to economically disadvantaged children (aged three through five) and their families. Additionally, the Early Head Start program, established in 1995, serves families with children aged birth to three. Congress amended the latest version of the Head Start Act in 2007, adding many new provisions related to homeless children including:

- adopting the McKinney-Vento Act's definition of homeless;
- qualifying homeless children as automatically eligible for Head Start services; and
- mandating that the U.S. Department of Health and Human Services issue regulations that require Head Start agencies to
    - identify and prioritize homeless children for enrollment;

- allow homeless families to apply to, enroll in, and attend Head Start programs while required documents are obtained within a reasonable time frame; and
- establish coordination between local Head Start programs and local homeless liaisons.

In 2016, new Head Start Performance Standards (https://nche.ed.gov/wp-content/uploads/2018/10/hs-final-regs-sept2016-homeless-1.pdf) included provisions to help programs better serve children experiencing homelessness by encouraging the use of tools like the community needs assessment, providing a grace period for families experiencing homelessness to meet immunization requirements, and allowing programs to reserve up to three percent of slots for foster children and children experiencing homelessness.

Runaway and Homeless Youth Act Programs

Legal Authority: Runaway and Homeless Youth Act (RHYA), 42 U.S.C. § 5601 et seq.

The RHYA authorizes three programs that address the needs of runaway youth and youth experiencing homelessness. A brief description of the three programs is provided below.

1) Basic Center Programs meet the immediate needs of runaway and homeless youth by providing emergency shelter, food, clothing, counseling, and referrals for health care. These shelters can serve youth under 18 years old for up to 21 days. To learn more, see the fact sheet available at http://www.acf.hhs.gov/programs/fysb/resource/bcp-fact-sheet.
2) Transitional Living Programs provide long-term residential services to help homeless youth ages 16 through 21 successfully transition to self-sufficient living. A fact sheet on Transitional Living Programs funded by the RHYA is available at: http://www.acf.hhs.gov/programs/fysb/resource/tlp-fact-sheet.
3) Street Outreach Programs offer outreach, services, and referrals to youth living on the street in order to move them into stable housing and prepare them for independence. By achieving these goals, the program also prevents sexual abuse and exploitation.

The fact sheet on street outreach programs is available online at http://www.acf.hhs.gov/programs/fysb/resource/sop-fact-sheet.

In addition to the mandates in the McKinney-Vento Act that require collaboration on the part of liaisons and LEAs, Basic Center and Transitional Living Programs are required by the RHYA to coordinate with McKinney-Vento programs in school districts. The *Runaway and Homeless Youth Act (RHYA) Regulations (45 CFR Part 1351) December 2016* provides information on the RHYA Final Regulations including the requirement for collaboration between local homeless liaisons and RHYA programs; it is available online at https://nche.ed.gov/wp-content/uploads/2018/10/rhya-final-regs-nche-markup-dec-2016.pdf.

In addition to the housing assistance provided through the RHYA, the Act also funds a national communications system, the National Runaway Safeline. The communication system helps homeless and runaway youth by providing crisis intervention, referrals, communication with youths' families, and emergency transportation home after a youth has run away. National Runaway Safeline assistance is also available for youth who are contemplating running away. While the Safeline has long been known for operating a crisis line for youth (1-800-RUNAWAY), the organization also has the option for youth to chat online with staff as well. Liaisons may benefit by visiting the Safeline website (http://www.1800runaway.org/), as it has a number of publications, including a runaway prevention curriculum, which could be used to raise awareness and provide training.

Local Social Services or Human Services Agencies

Legal Authority: Temporary Assistance for Needy Families (TANF), 42 U.S.C. § 601 et seq. (Title IV, Part A of the Social Security Act)

TANF funds can be used to help families avoid homelessness. The funds can be used for short-term assistance, such as rent or utility payments, without triggering the 60-month lifetime limit for assistance. As long as the funds are used to pay crisis related, non-recurring expenses, they can be used by a family more than once during a year. For example, a family could receive assistance for overdue rent, a car repair, and to bring utilities current all within the same year. A memorandum issued by the U.S. Department of Health and Human Services discusses this issue in more detail and may be

downloaded at http://www.acf.hhs.gov/programs/ofa/resource/tanf-acf-im-2013-01.

Legal Authority: Supplemental Nutrition Assistance Program (SNAP), 7 U.S.C. § 2011 et seq

Formerly known as Food Stamp Program, SNAP helps people with low incomes buy food. Although it is a federal government program, SNAP is administered by state or local agencies. The USDA has a Q&A document targeted specifically for homeless persons, including youth, about services available through SNAP. The information can be accessed at https://fns-prod.azureedge.net/sites/default/files/Homeless_QA_0.pdf. In addition, a USDA memorandum, *SNAP - Clarification of Policies Barriers Facing Homeless Youth, (*https://fns-prod.azureedge.net/sites/default/files/Policy_Clarifications_Homeless_Youth_Issues.pdf) was issued to ensure homeless youth can obtain food. Please note, the SNAP program is not the same as the USDA school meals program; instead it provides meals for both families and children outside of the school setting.

U. S. Department of Housing and Urban Development (HUD)

HUD currently administers a variety of programs dedicated to preventing or ending homelessness within the United States. They also collaborate with other Federal agencies for similar programs and administer the funding for several mainstream resource programs that provide resources to low income persons in addition to those experiencing homelessness.

Legal Authority: McKinney-Vento Homeless Assistance Act as amended by the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009, 42 U.S.C. § 11301 et seq.

Continuum of Care (CoC)
The Continuum of Care (CoC) Program is designed to promote community commitment to ending homelessness; provide funding for nonprofits and government entities to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused by homelessness; promote access to and effect utilization of mainstream programs; and optimize self-sufficiency among those experiencing homelessness. Contacts for CoCs are listed at: https://www.hudexchange.info/grantees

Each CoC is charged with identifying resources and areas of need and developing a plan for serving homeless persons in their area. This planning document will contain much of the community information that schools will need to effectively serve students experiencing homelessness by providing referrals. In addition, CoCs and their agency members are required to collaborate with the school district's local liaison to ensure the educational needs of children and youth are considered. This includes placing families in shelters or other housing close to the school of origin when possible.

Communities that receive CoC funds have participated in an extensive needs assessment, including the identification of existing resources, agencies, and services. Other potential sources for this valuable information include State interagency councils on homelessness, as most States have a State level council that mirrors local CoCs.

Institutions of Higher Education

Legal Authority: Higher Education Act, 20 U.S.C. § 1001 et seq

Unaccompanied homeless youth can be qualified as "independent students" for the purposes of filling out the FAFSA. Financial aid administrators are directed to obtain verification of this status from liaisons, if possible, when determining the financial aid available. A sample form letter for liaisons to make the determination as well as a verification form for financial aid administrators can be downloaded at https://nche.ed.gov/higher-education/.

Appendix 11.C Basic Tips for Collaboration

Identifying Potential Partners

Collaboration is a two-way street. People who work with children and youth experiencing homelessness often do so with little or no targeted financial resources. Collaboration with other programs in the school district and community agencies is an essential tool to access services for homeless students. When deciding to pursue a collaborative partnership, it is helpful to

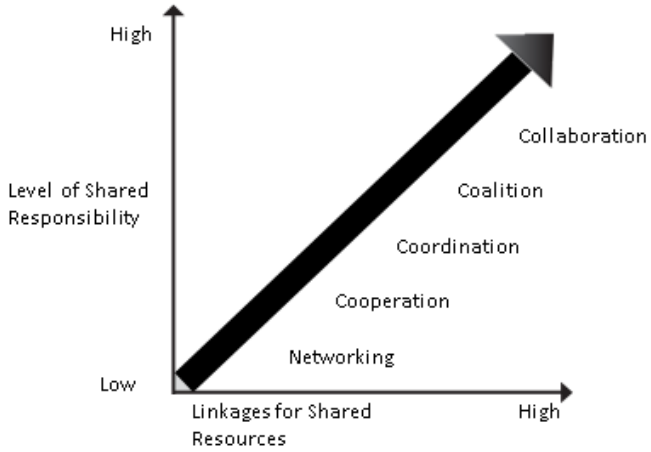
- identify the needs of homeless students in your district;
- know the responsibilities of other programs and community agencies in your district;
- identify areas of interest or overlap between homeless education and other programs and agencies;
- consider how other programs and agencies can assist and be sure to explain how their assistance can benefit them, if undertaken; and
- consider how you can provide reciprocal support, if possible.

Once a potential collaborative relationship is identified, determine your key contact person in the program or agency. Communicate regularly and stay focused on the issues germane to students.

Realizing the Level of Involvement Needed

The term *collaborative efforts* is used loosely here to describe a relationship where two or more individuals or groups work on behalf of the education of children and youth experiencing homelessness. The degree to which the parties share responsibilities and resources can vary greatly across partnerships, as shown in Figure 1.

Figure 1
Building Up to Collaboration



Relationships can range from low-level networking to true collaboration, which, by definition, is the highest level of shared responsibility in which resources are integrated. When reaching out to other programs and agencies, it is important to consider the level of relationship that may be needed to realize goals and to build on existing relationships. When new partners

are sought, consider working on lower-level relationships to build trust before attempting more complex interactions.

Initiating the Collaboration

Once you have considered how to make collaboration a win-win opportunity for students, it is time to approach the individuals, programs, or agencies with whom the prospective partnership will be formed.

Suggested activities for building a collaborative partnership include the following:

- Schedule a time to meet with the individual in charge of the program or agency.
- Prepare for the meeting by identifying the key points to be discussed.
- Explain your role as local liaison.
- Share what is needed in the district to support children and youth experiencing homelessness.
- Ask the individual for his/her support based on the program's or agency's responsibilities.
- Offer concrete suggestions for actions that can be taken by program or agency staff.
- Enter the meeting with a positive outlook and plan to leave with a specific commitment for support.

Developing the Collaboration

True collaborative relationships are often the result of growth. In fact, many collaborative agreements are sustained by building upon existing structures. While not all collaboration needs to be intense, key features of successful collaboration include the following:

- establishing a common goal, purpose, or focus;
- communicating regularly;
- sharing resources; and
- prioritizing and strategizing together.

Be sure to build in opportunities to discuss and develop these features when creating and maintaining relationships with other programs and agencies.

Collaboration Meets Many Needs

Most local liaisons have other responsibilities in addition to serving homeless children and youth. Unfortunately, if someone is experiencing homelessness, their plight is full-time. Combining efforts increases services to homeless students while reducing the time needed by the liaison to provide the services. By collaborating with the various school district programs and community agencies, the provision of services to the child or youth can become more prolific, comprehensive, and effective.

Table 11.1 Levels of Collaborative Effort

Level	Description	Example
Networking	Making connections with individuals or groups whose purpose is related to your mission	Having copies of the transportation department's meeting minutes forwarded to you
Cooperation	Working together on a limited basis	Asking a Spanish teacher to translate a document to be used to promote the educational rights of students experiencing homelessness in the Spanish-speaking community
Coordination	Combined effort on an initiative that meets the needs of both parties	Arranging with school nurses to refer children experiencing homelessness for free or low- cost medical and dental care
Coalition	Regular communication and sharing of resources, but each group still retains control over its domain	Agreeing on a process to ensure that student services, the local liaison, and the transportation department communicate when a homeless student has a change of address to ensure that the bus transports the student to and from the location where the student is currently staying
Collaboration	Working together and pooling resources to meet a common purpose or goal	The school and local liaison work with the parent(s) or guardian(s) to provide the best educational program for the student experiencing homelessness

Appendix 12.A Presenter Tips

Quick Tips

Power of 3: Getting the Point Across

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

Time Use

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

Handouts

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

Participant Involvement

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

Slide Presentation

Prepare slides that all participants can see by:

- using a plain font (such as Times New Roman, Helvetica, or Arial);
- selecting a large font size (22 point or larger), and
- including no more than 6 lines of text per slide

Movement

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

Information

- If referencing published material, know the title, author, and source information—people always ask.
- Provide your contact data: phone number, e-mail address, or mailing address.

Adult Learners

Adult learners are different from students in K–12 classrooms. They are responsible for their own learning and seek ways to fill that need. Adult learners are involved in workshops for a variety of reasons, such as

- professional benefits,
- benefits to their students,
- mandatory attendance requirements, and
- personal interests.

Adult learners are professionals in their field and can benefit from both the presentation and the opportunity to interact with colleagues. They like to leave knowing how they can affect positive change. One way to ensure this is to offer something they can immediately try when they get back to school. It should be fairly easy to implement with few, if any, materials needed.

Adapted from Project HOPE-Virginia materials

Appendix 12.B Common Signs of Homelessness

Note: While these are considered common signs, please recognize that they only offer general guidance. There is significant variability within the school-age homeless population. Individual students may differ significantly from the following general characteristics.

Lack of Educational Continuity

- Attendance at many different schools
- Missing records needed to enroll
- Inability to pay fees
- Gaps in skill development
- Mistaken assessment of abilities
- Poor organizational skills
- Poor ability to conceptualize

Poor Health/Nutrition

- Missing immunizations & medical records
- Unmet medical & dental needs
- Respiratory problems
- Skin rashes
- Chronic hunger or food hoarding
- Fatigue (may fall asleep in class)

Transportation & Attendance Problems

- Erratic attendance and tardiness
- Numerous absences
- Lack of participation in afterschool activities
- Lack of participation in field trips
- Inability to contact parents

Poor Hygiene

- Lacking shower facilities/washers, etc.
- Wearing clothes several days
- Inconsistent grooming

Lack of Personal Space After School

- Consistent lack of preparation for school
- Incomplete or missing homework
- Unable to complete special projects
- Lacking basic school supplies
- Loss of books and supplies on regular basis
- Elevated concern for safety of belongings

Social and Behavioral Concerns

- A marked change in behavior
- Poor/short attention span
- Poor self-esteem
- Extreme shyness
- Unwilling to form relationships with peers & teachers
- Difficulty socializing at recess or lunch periods
- Difficulty trusting people
- Aggression
- "Old" beyond years
- Overly protective of parents
- Clinging behavior
- Developmental delays
- Fear of abandonment
- School phobia (afraid to leave parent)
- Anxiety, especially late in the school day

Reactions or Statements by Parents, Guardians, or Students

- Exhibiting anger or embarrassment when asked about current address
- Avoidance of questions related to current address
- Statements about staying with grandparents, other relatives, friends, or in motels & campgrounds
- Statements such as:
  - "I don't remember the name of the last school."
  - "We've been moving around a lot."
  - "Our address is new; I can't remember it."
  - "We're staying with relatives until we get settled."
  - "We're going through a bad time right now."

Adapted from flyers developed by the Illinois & Pennsylvania Departments of Education.

Appendix 14.A McKinney-Vento Subgrant Authorized Activities

An LEA may use funds awarded under this section for activities that carry out the purpose of this subtitle, including the following:

1) The provision of tutoring, supplemental instruction, and enriched educational services that are linked to the achievement of the same challenging State academic standards the State establishes for other children and youths.

2) The provision of expedited evaluations of the strengths and needs of homeless children and youths, including needs and eligibility for programs and services (such as educational programs for gifted and talented students, children with disabilities, and English learners, services provided under Title I of the Elementary and Secondary Education Act of 1965 [20 U.S.C. 6301 et seq.] or similar State or local programs, programs in career and technical education, and school nutrition programs).

3) Professional development and other activities for educators and specialized instructional support personnel that are designed to heighten the understanding and sensitivity of such personnel to the needs of homeless children and youths, the rights of such children and youths under this part, and the specific educational needs of runaway and homeless youths.

4) The provision of referral services to homeless children and youths for medical, dental, mental, and other health services.

5) The provision of assistance to defray the excess cost of transportation for students under section 11432(g)(4)(A) of this title, not otherwise provided through Federal, State, or local funding, where necessary to enable students to attend the school selected under section 11432(g)(3) of this title.

6) The provision of developmentally appropriate early childhood education programs, not otherwise provided through Federal, State, or local funding, for preschool-aged homeless children.

7) The provision of services and assistance to attract, engage, and retain homeless children and youths, particularly homeless children and youths who are not enrolled in school, in public school programs and services provided to nonhomeless children and youths.

8) The provision for homeless children and youths of before- and after-school care, mentoring, and summer programs in which a teacher or other qualified individual provides tutoring, homework assistance, and supervision of educational activities.

9) If necessary, the payment of fees and other costs associated with tracking, obtaining, and transferring records necessary to enroll homeless children and youths in school, including birth certificates, immunization or other required health records, academic records, guardianship records, and evaluations for special programs or services.

10) The provision of education and training to the parents and guardians of homeless children and youths about the rights of, and resources available to, such children and youths other activities designed to increase the meaningful involvement of parents and guardians of homeless children or youths in the education of such children or youths.

11) The development of coordination between schools and agencies providing services to homeless children and youths, as described in section 11432(g)(5) of this title.

12) The provision of specialized instructional support services (including violence prevention counseling) and referrals for such services.

13) Activities to address the particular needs of homeless children and youths that may arise from domestic violence and parental mental health or substance abuse problems.

14) The adaptation of space and purchase of supplies for any nonschool facilities made available under subsection (a)(2) [services provided with subgrant funds] to provide services under this subsection.

15) The provision of school supplies, including those supplies to be distributed at shelters or temporary housing facilities, or other appropriate locations.

16) The provision of other extraordinary or emergency assistance needed to enable homeless children and youths to attend school and participate fully in school activities.

(42 U.S.C. § 11433(d)).

Appendix 15.A Template of Quadrants to Determine Priorities

	URGENT	NOT URGENT
IMPORTANT	**QUADRANT I**	**QUADRANT II**
NOT IMPORTANT	**QUADRANT III**	**QUADRANT IV**

Appendix 15.B

Top 5 List

5 Documents to Read:

1.
2.
3.
4.
5.

5 Documents to Keep on Hand:

1.
2.
3.
4.
5.

5 People to Know:

1.
2.
3.
4.
5.

5 Audiences for Training:

1.
2.
3.
4.
5.

5 Resources to Utilize:

1.
2.
3.
4.
5.

5 Programs to Coordinate With:

1.
2.
3.
4.
5.

Appendix 15.C School Level Point of Contact Information

The McKinney-Vento Homeless Assistance Act requires that every school district provide education and related services for students experiencing homelessness. In order to ensure your district remains in compliance with the law while providing an education of the highest quality to homeless students, a point of contact is needed in every building. This person will work with the local liaison to ensure students are identified and given appropriate opportunities to enroll, attend, and succeed in school. To assist with these tasks, the local liaison will provide support and training for the building level points of contact.

Please identify the most appropriate building level point of contact and provide his or her information below.

School Name:

Contact Name:

Direct Phone Extension:

Email:

If you need assistance determining the most appropriate person for this role in your building, please contact the local liaison for assistance. Once the building contact is identified, **please return this form to the local liaison no later than [Insert Date Here].**

The local liaison for our district is:

[Insert Contact Information Here]

Appendix 15.D Needs Assessment Worksheet and Summary

Awareness			
State Plan Requirements[1] – A description of programs for school personnel (including liaisons designated under subparagraph (J)(ii), principals and other school leaders, attendance officers, teachers, enrollment personnel, and specialized instructional support personnel) to heighten the awareness of such personnel of the specific needs of homeless children and youths, including such children and youths who are runaway and homeless youths [42 U.S.C. § 11432 (g)(1)(D)]. Coordination Purpose – Each local educational agency is required to coordinate with State and local housing agencies. This coordination must be designed to "raise the awareness of school personnel and service providers of the effects of short-term stays in a shelter and other challenges associated with homelessness" [42 U.S.C. § 11432(g)(5)(C)(iii)]. LEA liaison duties – Each local agency liaison for homeless children and youths, designated under paragraph (1)(J)(iii), shall ensure that – the parents or guardians of homeless children and youths are informed of the educational and related opportunities available to their children and are provided with meaningful opportunities to participate in the education of their children [42 U.S.C. § 11432(g)(6)(A)(v)]; public notice of the educational rights of homeless children and youths is disseminated in locations frequented by parents or guardians of such children and youths, and unaccompanied youths, including schools, shelters, public libraries, and soup kitchens, in a manner and form understandable to the parents and guardians of homeless children and youths, and unaccompanied youths [42 U.S.C. § 11432(g)(6)(A)(vi)]. State coordinators established under subsection (d)(3) and local educational agencies shall inform school personnel, service providers, advocates working with homeless families, parents and guardians of homeless children and youths, and homeless children and youths of the duties of the local educational agency liaisons, and publish an annually updated list of the liaisons on the State educational agency's website [42 U.S.C. § 11432(g)(6)(B)].			
Questions to Consider	**What's in Place**	**What's Needed**	**Priority**
• What is the level of awareness of school personnel on the needs of homeless children and youth? • What programs, activities, and trainings are conducted for LEA program administrators and school personnel to increase their awareness of homeless children and youth?			

[1] Many of the items listed as requirements in the State plan are considered activities that must be carried out at the LEA level. Therefore, several State plan provisions are included in the LEA needs assessment.

• What is the level of awareness of community agencies and organizations on the needs of homeless children and youth? • What activities take place to increase the level of awareness in community agencies, shelters, and service providers? • Are posters widely disseminated in schools and throughout the community? • How are parents and guardians of homeless children and youth informed of the educational rights of and opportunities for their children and of meaningful opportunities to participate in the education of their children? • How are unaccompanied homeless youth informed of educational rights and opportunities?			

Policies and Procedures

Statement of Policy – In any State where compulsory residency requirements or other requirements, in laws, regulations, practices, or policies may act as a barrier to the identification of, or the enrollment, attendance, or success in school of homeless children and youths, the State educational agency and the local educational agencies in the State will review and undertake steps to revise such laws, regulations, practices, or policies to ensure that homeless children and youths are afforded the same free, appropriate public education as provided to other children and youths. [42 U.S.C. § 11431(2)]

State Plan Requirements – Must include a description of procedures

- That the State educational agency will use to identify homeless children and youths in the State and to assess their needs [42 U.S.C. § 11432(g)(1)(B)];
- That ensure that homeless children and youths who meet the relevant eligibility criteria are able to participate in Federal, State, or local nutrition programs [42 U.S.C. § 11432(g)(1)(E)];
- That ensure that homeless children have access to public preschool programs, administered by the State educational agency or local educational agency, as provided to other children in the State [42 U.S.C. § 11432(g)(1)(F)(i)];
- That ensure that youths described in section 725(2) [definition of the term 'homeless children and youths'] and youths separated from public school are identified and accorded equal access to appropriate education and support services, including by identifying and removing barriers that prevent youths described in this clause from receiving appropriate credit for full or partial coursework

satisfactorily completed while attending a prior school, in accordance with State, local, and school policies [42 U.S.C. § 11432(g)(1)(F)(ii)]; and

- That ensure that homeless children and youths who meet the relevant eligibility criteria do not face barriers to accessing academic and extracurricular activities, including magnet school, summer school, career and technical education, advanced placement, online learning, and charter school programs, if such programs are available at the State and local levels [42 U.S.C. § 11432(g)(1)(F)(iii)].

The State plan must also include:

- A demonstration that the State educational agency and the local educational agencies have developed, and shall review and revise, policies to remove barriers to the identification of homeless children and youths, and the enrollment and retention due to outstanding fees or fines, or absences [42 U.S.C. § 11432(g)(1)(I)]; and
- An assurance that the State and the local educational agencies in the State will adopt policies and practices to ensure that transportation is provided, at the request of a parent or guardian (or in the case of an unaccompanied youth, the liaison), to and from the school of origin [42 U.S.C. § 11432(g)(1)(J)(iii)].

LEA Requirements – Privacy – Information about a homeless child's or youth's living situation shall be treated as a student education record, and shall not be deemed to be directory information, under section 444 of the General Education Provisions Act (20 U.S.C. 1232g) [42 U.S.C. § 11432(g)(3)(G)].

Review and Revisions –

(A) Each State educational agency and local educational agency that receives assistance under this subtitle shall review and revise any policies that may act as barriers to the identification of homeless children and youths or the enrollment of homeless children and youths in schools selected under paragraph (3) [best interest determination];

(B) In reviewing and revising such policies, consideration shall be given to issues concerning transportation, immunization, residency, birth certificates, school records and other documentation, and guardianship;

(C) Special attention shall be given to ensuring the identification, enrollment, and attendance of homeless children and youths who are not currently attending school [42 U.S.C. § 11432(g)(7)].

Questions to Consider	What's in Place	What's Needed	Priority
• What policies and procedures are in place for determining eligibility, enrolling homeless students, and connecting them to services in a timely way? • How are schools routinely informed of these policies and procedures? • Do they follow them? • What types of complaints regarding compliance issues or barriers to the school enrollment, attendance, and success of homeless students are received most frequently by the LEA that should be addressed in policies? • What specific policies and procedures are in place for unaccompanied homeless youth regarding consent, enrollment without a legal guardian, and other issues? • What policies and procedures ensure the privacy of the living situations of homeless children and youth?			

Dispute Resolution

State Plan – Must include a description of procedures for the prompt resolution of disputes regarding the educational placement of homeless children and youths [42 U.S.C. § 11432(g)(1)(C)].

LEA Requirements – If a dispute arises over eligibility, or school selection or enrollment in a school –
(i) the child or youth shall be immediately enrolled in the school in which enrollment is sought, pending final resolution of the dispute, including all available appeals;
(ii) the parent or guardian of the child or youth or (in the case of an unaccompanied youth) the youth shall be provided with a written explanation of any decisions related to school selection or enrollment made by the school, the local educational agency, or the State educational agency involved, including the rights of the parent, guardian, or unaccompanied youth to appeal such decisions;
(iii) the parent, guardian, or unaccompanied youth shall be referred to the local educational agency liaison, designated under paragraph (1)(J)(ii), who shall carry out the dispute resolution process as described in paragraph (1)(C) [disputes in the State plan] as expeditiously as possible after receiving notice of the dispute; and

(iv) in the case of an unaccompanied youth, the liaison shall ensure that the youth is immediately enrolled in the school in which the youth seeks enrollment pending resolution of such dispute [42 U.S.C. § 11432(g)(3)(E)].

LEA Liaison Duties – Each local educational agency liaison for homeless children and youths, designated under paragraph (1)(J)(ii), shall ensure that - enrollment disputes are mediated in accordance with paragraph (3)(E) [enrollment disputes] [42 U.S.C. § 11432(g)(6)(A)(vii)].

Questions to Consider	What's in Place	What's Needed	Priority
• Does the LEA have a written McKinney-Vento dispute resolution policy? If so, does it align with the state McKinney-Vento dispute resolution policy? • Do LEAs provide parents, guardians, or unaccompanied youth with written notice of a decision related to eligibility, school selection, or enrollment in a school and information on how they may initiate a dispute if they disagree? • Are disputes carried out expeditiously and according to the SEA's and LEA's McKinney-Vento dispute policy? • Are students enrolled in the school requested and provided all services, including transportation, during the dispute resolution process? • How many disputes have occurred over the past year? What were the areas of disagreement? • What could be done to avoid disputes?			

Identification			
LEA Liaison Requirements – Each local educational agency liaison for homeless children and youths, designated under paragraph (1)(J)(ii), shall ensure that homeless children and youth are identified by school personnel through outreach and coordination activities with other entities and agencies [42 U.S.C. § 11432 (g)(6)(A)(i)].			
Questions to Consider	**What's in Place**	**What's Needed**	**Priority**
• How many homeless children and youth are reported as enrolled in the LEA? Is this number consistent with the level of poverty in the LEA and community? • Is it likely that there are homeless children and youth in your state who have not been identified and are not attending school? • What kinds of outreach and coordination take place to increase the identification of homeless children and youth in your community? • What efforts are in place to identify homeless youth who do not attend school? • Does the LEA utilize a residency form upon enrollment to identify students who may be homeless? Has this form been reviewed to ensure it does not create a barrier to enrollment? • Are registrars and other school office staff familiar with the procedures for how to identify and determine eligibility for McKinney-Vento services?			

Enrollment
State Plan Requirements – Must include • Strategies to address other problems with respect to the education of homeless children and youths, including problems resulting from enrollment delays that are caused by – (i) requirements of immunization and other required health records; (ii) residency

requirements; (iii) lack of birth certificates, school records, or other documentation; (iv) guardianship issues; or (v) uniform or dress code requirements [42 U.S.C. § 11432(g)(1)(H)].

- A demonstration that the State educational agency and local educational agencies in the State have developed, and shall review and revise, policies to remove barriers to the identification of homeless children and youths, and the enrollment and retention of homeless children and youths in schools in the State, including barriers to enrollment and retention due to outstanding fees or fines, or absences [42 U.S.C. § 11432(g)(1)(I)].

LEA Requirements –

Immediate enrollment –

(i) The school selected in accordance with this paragraph [best interest determination] shall immediately enroll the homeless child or youth, even if the child or youth –

(I) is unable to produce records normally required for enrollment, such as previous academic records, records of immunization and other required health records, proof of residency, or other documentation; or

(II) has missed application deadlines during any period of homelessness.

(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 other required health records, the enrolling school shall immediately refer the parent or guardian of the child or youth or (in the case of an unaccompanied youth) the youth to the local educational agency liaison, designated under paragraph (1)(J)(ii), who shall assist in obtaining necessary immunizations or screenings, or immunization or other required health records in accordance with subparagraph D [records] [42 U.S.C. § 11432 (g)(3)(C)].

Records – Any record ordinarily kept by the school, including immunization or other required health records, academic records, birth certificates, guardianship records, and evaluations for special services or programs regarding each homeless child or youth shall be maintained so that the records involved are available, in a timely fashion, when a child or youth enters a new school or school district [42 U.S.C. § 11432(g)(3)(D)(i)].

Questions to Consider	What's in Place	What's Needed	Priority
• Do all schools in the LEA enroll homeless students immediately? When enrollment delays occur, what are the reasons? • How does the LEA remove barriers to enrollment due to lack of records typically required upon enrollment or due to missed deadlines during any period of homelessness?			

• Do homeless children and youth experience barriers to enrollment due to outstanding fines, fees, or absences? • Do enrolling schools immediately contact the school last attended by a child or youth to obtain relevant academic records? • Does the LEA liaison assist in obtaining necessary immunizations or screenings or immunization or other health records when needed? • Have enrollment barriers specific to unaccompanied homeless youth, such as enrolling without a parent or guardian, been eliminated? • Do schools make records available in a timely fashion to a new school in which a homeless child or youth enrolls? • How many and what types of complaints do you receive regarding enrollment barriers for homeless children and youth?			

School Selection

LEA Requirements -

- 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; and

  (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 [42 U.S.C. § 11432(g)(3)(A)].
- The term 'school of origin' means the school that a child or youth attended when permanently housed or the school in which the child or youth was last enrolled, including a preschool [42 U.S.C. § 11432 (g)(3)(I)(i)].
- When the child or youth completes the final grade level served by the school of origin, as described in clause (i), the term 'school of origin' shall include the designated receiving school at the next grade level for all feeder schools [42 U.S.C. § 11432(g)(3)(I)(ii)].

- In determining the best interest of the child or youth under subparagraph (A), the local educational agency shall (i) presume that keeping the child or youth in the school of origin is in the child's or youth's best interest, except when doing so is contrary to the request of the child's or youth's parent or guardian, or (in the case of an unaccompanied youth) the youth; (ii) consider student-centered factors related to the child's or youth's best interest , including factors related to the impact of mobility on achievement, education, health, and safety of homeless children and youth, giving priority to the request of the child's or youth's parent or guardian or (in the case of an unaccompanied youth) the youth; (iii) if, after conducting the best interest determination based on consideration of the presumption in clause (i) and the student-centered factors in clause (ii), the local educational agency determines that it is not in the child's or youth's best interest to attend the school of origin or the school requested by the parent or guardian, or (in the case of an unaccompanied youth) the youth, provide the child's or youth's parent or guardian or the unaccompanied youth with a written explanation of the reasons for its determination, in a manner and form understandable to such parent, guardian, or unaccompanied youth, including information regarding the right to appeal under subparagraph (E) [enrollment disputes] [42 U.S.C. § 11432(g)(3)(B)].

Questions to Consider	What's in Place	What's Needed	Priority
• What is the average mobility rate of homeless students (number of school transfers in a year) in the LEA? How does this compare to the average mobility rate of nonhomeless students in the LEA? • Does the LEA presume that remaining in the school of origin is in the homeless child's or youth's best interest? • What are the procedures for determining best interest for school selection for homeless students? • Do young homeless children attending SEA- or LEA-preschools remain in their school of origin? • Are designated receiving schools for feeder schools considered schools of origin for homeless students who complete the final grade level served by a school of origin? • What calls and complaints do you receive indicating barriers to homeless students enrolling in either the school of origin or the local attendance area school?			

Transportation			
State Plan Requirements – Such plan shall include the following: Assurances that the following will be carried out – the State and local educational agencies in the State will adopt policies and practices to ensure that transportation is provided, at the request of the parent or guardian (or in the case of an unaccompanied youth, the liaison), to and from the school of origin, as determined in paragraph (3) [42 U.S.C. § 11432(g)(1)(J)(iii)]. LEA Liaison Duties – Each local educational liaison for homeless children and youths designated under paragraph (1)(j)(ii) shall ensure that the parent or guardian of a homeless child or youth, and any unaccompanied youth, is fully informed of all transportation services, including transportation to the school of origin, as described in paragraph (1)(J)(iii), and is assisted in accessing transportation to the school that is selected under paragraph (3)(A) [the best interest determination] [42 U.S.C. § 11432(g)(6)(A)(viii)].			
Questions to Consider	**What's in Place**	**What's Needed**	**Priority**
• What is the average length of time for the LEA to arrange transportation for homeless children and youth? • Are transportation services arranged quickly so that attendance is not impacted? • Are preschool-aged children provided transportation to and from the school of origin? • Do state or local pupil transportation policies allow for flexibility in determining the most efficient mode of transportation to and from the school of origin? • Does the LEA have formal or informal interdistrict policies in place for sharing the cost and responsibility for transporting homeless students across school district lines for remaining in the school of origin? • What are the biggest challenges in arranging transportation to and from the school of origin? • What resources are in place to support providing transportation to and from the school of origin?			

Access to Services			
State Plan Requirements – Must include • A description of how such children and youths are (or will be) given the opportunity to meet the same challenging State academic standards as all students are expected to meet [42 U.S.C. § 11432(g)(1)(A)]; • A description of procedures that ensure that homeless children and youths who meet the relevant eligibility criteria are able to participate in Federal, State, or local nutrition programs [42 U.S.C. § 11432(g)(1)(E)]; • A description of procedures that ensure that— (i) homeless children have equal access to public preschool programs, administered by the State educational agency or local educational agency, as provided to other children in the State; (ii) homeless youths as described in section 725(2) [definition of homeless children and youths] and youths separated from public schools are identified and accorded equal access to appropriate secondary education and support services, including by identifying and removing barriers that prevent youths described in this clause from receiving appropriate credit for full or partial coursework satisfactorily completed while attending a prior school, in accordance with State, local, and school policies; and (iii) homeless children and youths who meet the relevant eligibility criteria do not face barriers to accessing academic and extracurricular activities, including magnet school, summer school, career and technical education, advanced placement, on-line learning, and charter school programs, if such programs are available at the State and local levels [42 U.S.C. § 11432(g)(1)(F)]; • Assurances that the following will be carried out – The State educational agency and local educational agencies in the State will adopt policies and practices to ensure that homeless children and youths are not stigmatized or segregated on the basis of their status as homeless [42 U.S.C. § 11432(g)(1)(J)(i)]. LEA Liaison Requirements – Each local educational agency liaison for homeless children and youths, designated under paragraph (1)(J)(ii), shall ensure that (iii) homeless families and homeless children and youths have access to and receive educational services for which such families are eligible, including services through Head Start programs (including Early Head Start programs) under the Head Start Act (42 U.S.C. 9831 et seq.), early intervention services under part C of the Individuals with Disabilities Education Act (20 U.S.C. 1431 et seq.), and other preschool programs administered by the local educational agency; (iv) homeless families and homeless children and youth receive referrals to health care services, dental services, mental health and substance abuse services, housing services, and other appropriate services [42 U.S.C. § 11432(g)(6)(A)]. LEA Liaison Requirements – Must ensure that – unaccompanied youths (I) are enrolled in school; (II) have opportunities to meet the same challenging State academic standards as the State establishes for other children and youths, including through implementation of procedures under paragraph (1)(F)(ii); and (III) are informed of their status as independent students under section 480 of the Higher Education Act of 1965 (20 U.S.C. 1087vv) and that the youths may obtain assistance from the local educational agency liaison to receive verification of such status for purposes of the Free Application for Federal Student Aid described in section 483 of such Act (20 U.S.C. 1090) [42 U.S.C. § 11432(g)(6)(A)(x)].			
Questions to Consider	**What's in Place**	**What's Needed**	**Priority**

• Are homeless students placed in classes on the day they enroll? • How do schools place students when their records are not available on the day they enroll? • How does the LEA ensure that homeless students are enrolled and assisted with basic school requirements (e.g., records transfer)? • How does the LEA ensure that homeless students are linked to all services for which they are eligible, including tutoring and other academic support services? • What policies and procedures ensure that eligible homeless children and youth can enroll in magnet schools, summer school programs, career and technical education programs, and on-line learning without barriers? • Are homeless students able to access free meals immediately when they become homeless or enroll in school? • How does the LEA ensure that young homeless children have access to public preschool programs administered by the SEA or LEA? • How are young homeless children linked to Head Start, Early Head Start, and early intervention services under IDEA, Part C? • How does the LEA ensure that homeless children and youth and their families are linked to community services as needed? • How does the LEA ensure that homeless unaccompanied or out-of-school youth are enrolled and linked to services? • How are homeless students supported in participating in extracurricular activities, including athletics?			

• What processes ensure that homeless students with IEPs from other LEAs are provided immediate and continual services? • What services does the LEA provide to address the trauma needs of homeless children and youth? • How do you ensure that homeless children and youth are not stigmatized or segregated on the basis of their status as homeless?			

School Success

Statement of Policy – Homeless children and youths should have access to the education and other services that such children and youths need to ensure that such children and youths have an opportunity to meet the same challenging State academic standards to which all students are held [42 U.S.C. § 11431(4)].

State Plan – Must include

- A description of how homeless children and youths are (or will be) given the opportunity to meet the same challenging State academic standards as all students are expected to meet [42 U.S.C. § 11432(g)(1)(A)];
- A description of procedures that ensure that – youths described in section 725(2) [definition of homeless children and youths] and youths separated from public schools are identified and accorded equal access to appropriate secondary education and support services, including by identifying barriers and removing barriers that prevent youths described in this clause from receiving appropriate credit for full or partial coursework satisfactorily completed while attending a prior school, in accordance with State, local, and school policies [42 U.S.C. § 11432(g)(1)(F)(ii)].

LEA Liaisons – Each local educational agency liaison for homeless children and youths, designated under paragraph (1)(J)(ii), shall ensure that homeless children and youths are enrolled in, and have a full and equal opportunity to succeed in, schools of that local educational agency [42 U.S.C. § 11432(g)(6)(A)(ii)].

Questions to Consider	What's in Place	What's Needed	Priority
• How do homeless children and youth in the LEA perform academically in comparison to the LEA or state average for all students?			

• What is the rate of grade-level promotion or retention for homeless students? How does that compare to the LEA or state average? • How does the LEA support improvement of homeless children and youth in the areas of academic proficiency? • How does the attendance rate of homeless children and youth compare to the LEA or state average? • How does the LEA support regular attendance of homeless children and youth? • What is the state's rate of homeless youth dropping out of school? What is the on-time graduation rate of homeless students? How do these rates compare with the state average for all students? What services exist to enroll and retain homeless youth? • How does the rate of disciplinary referrals and suspensions for homeless students and youth compare to the state average? How does the LEA review discipline referrals for homeless students to ensure they are not punished for actions and behaviors related to their homelessness? • What policies and practices enable homeless students to recover credits or attain partial credit for work completed while attending a prior school?			

Collaboration within the LEA			
Coordination Purpose – The coordination required under subparagraphs (A) and (B) shall be designed to – (i) ensure that homeless children and youths are promptly identified; (ii) ensure that homeless children and youths have access to, and are in reasonable proximity to, available education and related support services; and (iii) raise the awareness of school personnel and service providers of the effects of short-term stays in a shelter and other challenges associated with homelessness [42 U.S.C. § 11432 (g)(5)(C)]. Homeless Children and Youths with Disabilities – For children and youths who are to be assisted both under this subtitle, and under the Individuals with Disabilities Education Act (20 U.S.C. 1400 et seq.) or section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), each local educational agency shall coordinate the provision of services under this part with the provision of programs for children with disabilities served by that local educational agency and other involved local educational agencies [42 U.S.C. § 11432 (g)(5)(D)].			
Questions to Consider	**What's in Place**	**What's Needed**	**Priority**
• How do you ensure coordination among LEA administrators and personnel programs serving homeless students? Consider specifically ○ pupil transportation ○ school registrars ○ special education ○ child nutrition ○ English learners ○ early childhood ○ early learning services ○ migrant education ○ dropout and truancy prevention ○ after-school tutoring programs ○ school counselors and social workers ○ school nurses ○ charter schools, if applicable			

Title I			
Title I Requirements – A local educational agency may receive a subgrant under this part for any fiscal year only if such agency has on file with the State educational agency a plan, approved by the State educational agency, that…is coordinated with…the McKinney-Vento Homeless Assistance Act [20 U.S.C. § 6312(a)(1)(B)]. Each local educational agency plan shall describe…the services the local educational agency will provide homeless children and youths, including services provided with funds reserved under section 6313(c)(3)(A), to support the enrollment, attendance, and success of homeless children and youths, in coordination with the services the local educational agency is providing under the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11301 et seq.) [20 U.S.C. § 6312(b)(6)]. A local educational agency shall reserve such funds as are necessary under this part…to provide services comparable to those provided to children in schools funded under this part to serve homeless children and youths, including providing educationally related support services to children in shelters and other locations where children may live [20 U.S.C. § 6313(c)(3)(A)(i)]. Funds reserved under subparagraph (A)(i) [for comparable services for homeless children and youths] may be determined based on a needs assessment of homeless children and youths in the local educational agency, taking into consideration the number and needs of homeless children and youths in the local educational agency, and which needs assessment may be the same needs assessment as conducted under section 11433(b)(1) of title 42 [20 U.S.C. § 6313(c)(3)(C)(i)]; and used to provide homeless children and youths with services not ordinarily provided to other students under this part including providing – (I) funding for the liaison designated pursuant to section 11432(g)(1)(J)(ii) of title 42; and (II) transportation pursuant to section 11432(g)(1)(J)(iii) of such title [20 U.S.C. § 6313(c)(3)(C)(ii)].			
Questions to Consider	**What's in Place**	**What's Needed**	**Priority**
• What resources, supports, and services are provided to homeless children and youth through Title I, Part A? • Does the Title I program reserve funds for homeless students? • Is this set aside an amount sufficient to meet the needs of homeless children and youth in the LEA? • Is this amount based on a discussion between the local homeless liaison and Title I coordinator on the data about and the needs of homeless students?			

• Do you have input on the description in the local plan of the coordination between the Title I and McKinney-Vento programs? • What is the frequency of communication between the Title I coordinator and you?			

Community Collaboration			
Coordination – Each local educational agency serving homeless children and youths that receives assistance under this part shall coordinate – the provision of services under this part with local social services agencies and other agencies or entities providing services to homeless children and youths and their families, including services and programs funded under the Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq.) [42 U.S.C. § 11432(g)(5)(A)(i)]. Coordination with Housing Assistance – If applicable, each State educational agency and local educational agency that receives assistance under this part shall coordinate with State and local housing agencies responsible for developing the comprehensive housing affordability strategy described in section 105 of the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. 12705) to minimize educational disruption for children and youths who become homeless [42 U.S.C. § 11432(g)(5)(B)].			
Questions to Consider	**What's in Place**	**What's Needed**	**Priority**

• What activities do you conduct to foster coordination and collaboration with the following:
  ○ Public and private child welfare and social service agencies
  ○ Medical clinics
  ○ Mental health services
  ○ Food and clothing banks
  ○ Law enforcement agencies
  ○ Domestic violence agencies
  ○ Child care providers
  ○ Providers of services and programs funded under the Runaway and Homeless Youth Act
  ○ housing and HUD-funded programs
  ○ Head Start and Early Head Start
  ○ Early intervention programs (IDEA, Part C)			

○ Homeless shelters ○ Higher education institutions ○ Business partners ○ Faith-based organizations ○ Other groups serving homeless children and youth and their families			
Resources, Capacity, and Compliance			
State Plan Requirements: Must provide assurances that • The local educational agencies will designate an appropriate staff person, able to carry out the duties described in paragraph (6)(A) [of the local liaison] [42 U.S.C. § 11432 (g)(1) (J)(ii)]; • The State and the local educational agencies in the State will adopt policies and practices to ensure participation by liaisons described in clause (ii) in professional development and other technical assistance activities provided pursuant to paragraphs (5) and (6) of subsection (f) [functions of Office of Coordinator] as determined appropriate by the Office of the Coordinator [42 U.S.C. § 11432(g)(1)(J)(iv)]. Each local educational agency liaison for homeless children and youths, designated under paragraph (1)(J)(ii), shall ensure that school personnel providing services under this subtitle receive professional development and other support [42 U.S.C. § 11432(g)(6)(A)(ix)].			
Questions to Consider	**What's in Place**	**What's Needed**	**Priority**
• Does the LEA provide the local liaison the time and support to sufficiently carry out your duties? ○ How much time is needed? ○ How much time is allocated? • Do you receive sufficient training to carry out your responsibilities? • Do you provide professional development and other support to school personnel serving homeless children and youth? • Do you review data on an annual basis to identify needs and plan efficient use of resources? • What are sources of support that the LEA provides for homeless children and youth?			

• What are sources of support that come from federal and state programs? • What supplemental services are provided through subgrants, if applicable? • What are the most critical areas of support still needed to serve homeless students? • What compliance problems were identified in the LEA's most recent monitoring of the EHCY program? How have these been addressed?			
Charter Schools (if applicable)			
State Plan Requirements – Must include a description of procedures that ensure that homeless children and youths who meet the relevant eligibility criteria do not face barriers to accessing academic and extracurricular activities, including … charter school programs, if such programs are available at the State and local levels [42 U.S.C. § 11432(g)(1)(F)(iii)].			
Questions to Consider	**What's in Place**	**What's Needed**	**Priority**
• What do you do to create awareness of the needs and rights of homeless students? • Does the school have a local homeless liaison (if considered its own LEA)? • Does the school follow the requirements of the McKinney-Vento Act, particularly with regard to identification, enrollment, and transportation? • What professional development have the local liaison and other charter school staff received on the rights of homeless children and youth? • Does your school submit data to the SEA and ED*Facts* on homeless children and youth annually?			

Needs Assessment Summary: High Priority Needs

In the following table, list the highest priority needs identified in the guiding questions and create a concrete (measurable) goal that the LEA should achieve during the next year to address each need. This information will guide the development of an annual action plan.

Focus Area	*Priority Needs*	*Measurable Goal*
Awareness		
Policies and Procedures		
Disputes		
Identification		
Enrollment		
School Selection		
Access to Services		
Transportation		
Student Success		
Collaboration within the LEA		

Focus Area	*Priority Needs*	*Measurable Goal*
Collaboration with Title I		
Community Collaboration		
Resources and Capacity		
Charter Schools (if applicable)		

Stakeholders Providing Input to the Guiding Questions Responses

Name	*Role Group*	*Phone*	*Email*

Developed by NCHE 9.17

Appendix 15.E Sample Barrier Tracking Form

Request Date	**Response Date**
Contact Name, Phone Number, Email	
Contact Role (Parent, Agency, Student, etc.)	
School Involved	
Request Topic	
Type of Request	☐ **Request for Information** ☐ **Complaint or Possible Compliance Concern** ☐ **Inquiry from School or Program Administrator** ☐ **Request for Action** ☐ **Request for or Indicator of Need for Technical Assistance**
Request Description	
Response	

Repeat Table as Needed