



National Center for
Homeless Education

<https://nche.ed.gov>



A Closer Look at File Specifications: FS 170

The National Center for Homeless Education (NCHE) developed a series of briefs focused on ensuring data submitted to the U.S. Department of Education (ED) meet quality standards and conform to program requirements. As the third in the series, this brief provides information about the data collection and submission process for File Specification (FS) 170: LEA Subgrant Status.

Data Collected by FS 170

FS 170 includes data group 754. It provides information on how to report which local education agencies (LEAs) receive McKinney-Vento subgrants. LEAs are marked with a “yes” to indicate they received funds authorized by the McKinney-Vento Act, or “no” to indicate they did not receive such funds.

Important Dates

FS 170 is due by December 15, 2021 for School Year 2020-21. Once the data have been submitted to ED, the information will undergo a data quality review. States will then have the opportunity to submit data again as needed; the due date for data resubmission is typically in late March.

Data Quality Checks

During the data quality review, information submitted by states will be compared to the Business Rules Single Inventory (BRSI). The full BRSI, which contains rules for all data submitted through *EDFacts*, is available at <https://www2.ed.gov/about/inits/ed/edfacts/business-rules-guide.html>.

The questions below are based on rules pertaining to FS 170 contained in the BRSI. State coordinators, *EDFacts* coordinators, and others reviewing data included in FS 170 can use them to validate their data. If any question results in a response of no, state coordinators should investigate the reason and work with liaisons or the data staff submitting information to make corrections prior to submitting information to ED. If upon further investigation, the data are determined to be correct, state coordinators should work with *EDFacts* coordinators to submit explanatory comments with the data.

Completeness

- Does the list of LEAs in FS 170 include all open LEAs?
- Does the list of LEAs in FS 170 include all reopened LEAs?
- Does the list of LEAs in FS 170 include all new LEAs?
- Does the list of LEAs in FS 170 include all added LEAs?

- Does the list of LEAs in FS 170 include all LEAs with changed boundaries?
- Does the list of LEAs in FS 170 include operational LEAs even if they have no students in membership?
- Does every LEA included in FS 170 have a subgrant status of yes or no?

Current Year Accuracy

- Does the list of LEAs in FS 170 exclude all closed or future LEAs?
- If a subgrant includes a consortium, is every LEA that is a member in the consortium marked with a subgrant status of yes?

Accuracy Across Years

- Did the number of LEAs with a subgrant change by more than 15% over the previous year?

General Data Quality Notes

All operational public LEAs reported in FS 029 should be included. This includes:

- regular public school districts that are not a part of a supervisory union,
- regular public school districts that are a component of a supervisory union,
- specialized public school districts,
- supervisory unions,
- service agencies,
- state operated agencies,
- independent charter schools, and
- other local educational agencies.

LEAs with an operational status of open, new, added, changed boundary, and reopened must be flagged as receiving or not receiving a McKinney-Vento subgrant. Under the McKinney-Vento Act, LEAs such as service agencies and supervisory unions that do not enroll students but provide administrative oversight for other LEAs may receive a grant. As a result, LEAs should be provided with a grant status even if they have no students in membership. For example, a state has 200 LEAs with a status of open, 10 LEAs with a status of new, 5 LEAs with a status of added, 5 reopened LEA, 10 future LEAs, and 5 closed LEAs. Of the 235 LEAs in the state, 175 enrolled at least one student. Fifteen of the LEAs without students are the closed and future LEAs; the remaining 45 LEAs are service agencies, state operated LEAs, and supervisory unions. Based on this information, the state will report 220 LEAs with a grant status in FS 170.

All LEAs that are a part of a consortium or regional subgrant should be reported as subgrantees. This is true even if another LEA in the consortium is designated as the lead agency.

Charter schools may or may not be considered an LEA based on the charter school law in each state. Consult with the state's charter school program to determine if charter schools should be included as a separate LEA.

Providing Notes About Quality

SEAs are required to respond to the feedback sent to them by ED during the data quality review. Additionally, SEAs are allowed to submit comments with their data to explain why the data may be outside expected ranges. The comments should be concise, explain a problem or large change contained with the data, explain why data have not been submitted, or explain steps the SEA is taking to correct the data. The three most common mistakes SEAs make with regard to including comments with their data are:

1. using the same comment that was used for the previous collection window, even though it is out of date and no longer relevant;

2. including comments for a data point that do not apply to that data; and
3. including comments that are unclear or confusing.

The following are examples of comments that help clarify data included under FS 170, and therefore are likely to reduce the number of corrections the SEA will be asked to make:

- Our state provided supplemental funding for LEAs using mini-grants. This resulted in an increase in the number of LEAs with subgrants.
- Our state revised our grant application process, with a specific focus on LEAs that were rural. This resulted in a number of first time subgrantees and increased the number of LEAs receiving grants.
- Our state instituted a consortium model. This resulted in a smaller number of LEAs that received a subgrant.
- Our state revised our grant application process to include a funding structure based on the number of identified homeless students. This impacted the number of LEAs that received a subgrant.

The following are examples of comments that are vague, do not indicate what steps were taken to address the concern noted by ED during the data review, or indicate that the SEA violated a rule included in the file specs, and are therefore likely to result in a data flag:

- In response to an error message: Data are correct.
- In response to an error message: This is the same methodology we used last year.
- Our state only reports LEAs that are a type 1 or 9 LEA.
- Our state does not include data for any administrative units (LEA type 4).
- Our state does not report on state operated programs (LEA type 5).

Public Availability of Data

While data are aggregated and do not include personally identifiable information, they are made available to the public in order to increase transparency, identify technical assistance and programmatic needs, and provide information to policymakers. The following list is not all inclusive as LEAs, SEAs, and other non-governmental organizations may also release information on the education of students experiencing homelessness, but it provides several examples of how data submitted to ED are released to the public.

- **ED Data Express** is a website hosted by ED to improve public access to data at the district and state levels. Subgrant status data and related notes on data quality can be accessed by visiting <https://eddataexpress.ed.gov/> and selecting the green download button. After clicking the green reset filters button, the public can select the state, school year, and file specification to create a downloadable file.
- **NCHE's Federal Data Summaries** published by NCHE have historically included the number and percentage of LEAs receiving subgrants; additional information on the federal awards received by each state is available starting with SY 2012-13. These reports are available at <https://nche.ed.gov/data-and-stats/> and <https://oese.ed.gov/offices/office-of-formula-grants/school-support-and-accountability/education-for-homeless-children-and-youths-grants-for-state-and-local-activities/performance/>.
- **Government Performance and Results Act reports** provide information on long-term goals and performance measures for federal government agencies. Two GPRA measures are calculated using data for only those students enrolled in LEAs with subgrants: the percentage of students experiencing homelessness who are proficient in reading/language arts and mathematics, Grades 3 through 8. This information populates the President's Budget Request for the U.S. Department of Education, Justification of Appropriations Estimates to the Congress, available at <https://www2.ed.gov/about/overview/budget/tables.html?src=rt>.



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