

STATE COORDINATORS' HANDBOOK



National Center for Homeless Education

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Chapter 1: Introduction

1.1. Purpose of the Handbook

The State Coordinators' Handbook (Handbook) is a critical resource for administrators who are responsible for their state Education for Homeless Children and Youth (EHCY) program.

This Handbook provides an overview of program requirements and expectations as well as resources and strategies to support effective programs at the state and local levels.

The Handbook has been updated in 2025 to reflect best practices and new developments for administrators of the EHCY program, as mandated by Subtitle VII-B of the McKinney-Vento Homeless Assistance Act (reauthorized in 2015 by Title IX, Part A of the Every Student Succeeds Act and hereafter referred to as the *McKinney-Vento Act*). Throughout the Handbook, you will receive clear directives from the federal legislation, as well as the most recent non-regulatory guidance that the U.S. Department of Education has published.

The Handbook aims to support you in creating programs that meet and go beyond compliance with applicable laws and regulations. It offers practical strategies to support you in your unique, multifaceted role as a state coordinator, improving outcomes for students experiencing homelessness. Throughout these chapters, we will address emerging areas of focus and effective strategies that state coordinators have employed in recent years, including:



Strategic collection and use of data by state coordinators to drive decision-making.



Deeper focus on ensuring all students experiencing homelessness receive the support they need to succeed.



Development of cross-system and interagency collaboration to provide wraparound services to students and families experiencing homelessness.

1.2 Contents Overview

The Handbook contains 13 chapters, divided into four sections:

- 1** **Section A (Chapters 1-2)** introduces you to the Handbook and your role as a state coordinator.
- 2** **Section B (Chapters 3-5)** provides a foundation for your work, outlining key concepts, organizational governance, and critical policies you will navigate daily.
- 3** **Section C (Chapters 6-11)** explores the main functions state coordinators provide in the state educational agency (SEA) and in supporting local educational agencies (LEAs), including chapters that provide insight into McKinney-Vento requirements and best practices to support you in your work.
- 4** **Section D (Chapters 12-13)** highlights resources and strategies to support you in managing your work, including needs assessment tools, annual planning strategies, and additional resources to enable the continuous improvement of your state's EHCY program, year over year.

1.3. Using the Handbook

The Handbook supports all state coordinators in their work; however, it is primarily designed to assist in onboarding new state coordinators. Early chapters will introduce high-level context and foundational knowledge before diving deeper into strategies for effective programs in later chapters. Throughout this resource, you will find digestible, shareable references that can support all state coordinators (experienced and new) in their work with LEAs, local liaisons, and interagency partners. We hope state coordinators will revisit this

resource to find key citations and requirements to share with your partners within the SEA and LEAs you serve.

In response to prior requests from state coordinators, the Handbook is designed to guide you through expectations for your state EHCY program with essential guidance and readily available resources. The Handbook begins with foundational content before exploring specific program areas. Start reading chapter by chapter and return whenever questions arise in your work.

We recognize that every state has unique contexts and challenges. While the Handbook cannot account for the nuance of this work, we hope it provides a starting point, key strategies, and reminders that can support state coordinators—both experienced and new—in their critical work.

This resource was developed by the National Center for Homeless Education (NCHE), which operates the U.S. Department of Education’s technical assistance center for the federal EHCY program. NCHE provides many resources designed to support you in your role. The Handbook includes an “Additional Resources” box at the end of each chapter to connect you with materials pertinent to the chapter’s topic.

Additional Resources

- NCHE: [Main website](#)
- Links to legislation and excerpts: overview of the [McKinney-Vento Homeless Assistance Act](#)

Chapter 2: Overview of the State Coordinator Role

2.1 Executive Summary

While every state context varies, and many state coordinators wear multiple hats in their state educational agencies (SEAs), the basic requirements of the McKinney-Vento Act remain consistent. This section explores the expectations of state coordinators who are responsible for their state's EHCY program.

IN THIS CHAPTER, WE WILL OUTLINE:

- your role as a state coordinator, as described in Subtitle VII-B of the McKinney-Vento Homeless Assistance Act (most recently reauthorized in 2015 by Title IX, Part A of the Every Student Succeeds Act) and commonly referred to as the McKinney-Vento Act,
- key functions of the state coordinator role, as defined by the McKinney-Vento Act, and
- an introduction to effective strategies in overseeing your EHCY program.

2.2 McKinney-Vento Definition of the State Coordinator Role

State coordinators play an essential role in implementing the EHCY program. Under the McKinney-Vento Act, the Office of the Coordinator is an SEA designation (McKinney-Vento Act section 722(d)(3)). The state coordinator must perform seven functions, which are outlined below. In addition, the state coordinator is responsible for carrying out and overseeing other responsibilities required of the SEA in the law, as described in Chapter 4. The state coordinator is the key link to local liaisons, required in every LEA, and to other SEA programs and state-level agencies that serve children and families experiencing homelessness.

For the state coordinator to effectively manage the program, the McKinney-Vento Act allows for up to 25% of the annual EHCY program allocation to the state (or up to 50% for states funded at the minimum level) to be spent on state-level activities (McKinney-Vento Act section 722(e)(1)).

2.3 Key Functions Under the McKinney-Vento Act

According to the McKinney-Vento Act, there are seven key functions that the Office of the Coordinator (state coordinator) must fulfill:

Legislative Resource

Consult the McKinney-Vento Act section on [Functions of the Office of the Coordinator](#) to review the statutory requirements (McKinney-Vento Act section 722(f)).

- 1 Gather and make information publicly available on:**
 - the number of children and youths experiencing homelessness identified in the state and post this information on the SEA's website;
 - the nature of the problems children and youths experiencing homelessness face in gaining access to school;
 - the difficulties in identifying the unique needs and barriers to school participation and achievement children and youths experiencing homelessness face;
 - any progress made by the SEA and LEAs in addressing the problems and difficulties; and
 - the success of the programs in identifying children and youths experiencing homelessness and allowing them to enroll in, attend, and succeed in school.
- 2 Develop and carry out the State Plan.** The Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act (ESSA), requires every state to develop a consolidated state plan, which includes individual program state plans. Each state plan includes a section specific to the EHCY program. [View all consolidated state plans online.](#)




- 3** **Collect data for submission to the U.S. Department of Education (the Department) annually.**
- 4** **Coordinate activities and collaborate with:**
 - educators,
 - providers of services to homeless children and youth and their families,
 - providers of emergency, transitional, and permanent housing to homeless children and youth and their families,
 - LEA local homeless liaisons, and
 - community organizations and groups representing homeless children and youth and their families.
- 5** **Provide technical assistance to and conduct monitoring of LEAs for compliance with the McKinney-Vento Act.**
- 6** **Provide professional development opportunities for LEA personnel and the local homeless liaison.**
- 7** **Respond to inquiries from parents and guardians of homeless children and youths, and (in the case of unaccompanied youths) such youths, to ensure that each child or youth receives full protections and services under the McKinney-Vento Act (McKinney-Vento Act section 722(f)(7)).**

Each of these functions will be described in detail in subsequent chapters of the State Coordinators' Handbook.

2.4 Effective Strategies

The State Coordinators' Handbook features effective strategies drawn from years of experience of state coordinators who have been in the position before you. Moreover, the program has evolved over the years to reflect several priorities from the Department. These priorities should be considered overarching strategies that shape all of the state coordinator's activities. The Department and NCHE recommend implementing the following strategies to help you fulfill the program requirements and achieve more positive outcomes

for students experiencing homelessness in your state:

	Strategic collection and use of data by state coordinators to drive decision-making.
	Deeper focus on ensuring all students experiencing homelessness receive the support they need to succeed.
	Development of cross-system and interagency collaboration to provide wraparound services to students and families experiencing homelessness.

2.5 Learning About Your State's EHCY Program

When onboarding into the state coordinator role, you must take time to learn about your state's EHCY program. We recommend you locate and review available resources to unpack the priorities, resources, and constraints in your local context. The list below suggests sources of information about your operating conditions as well as the opportunities and challenges you may face in continuously improving education for students experiencing homelessness. You should review the following:

- **The SEA's state coordinator job description.** The job description will reveal the responsibilities, priorities, and resources available to you. Official job descriptions should begin to indicate a reporting structure and/or name key collaborators within the SEA with whom you should consult regularly.
- **State-level activity funds.** The existing program budget will indicate how much funding is available and how it has been spent within the EHCY program.
- **Documents such as ESSA plans, monitoring reports, and state data.** These reports will detail the EHCY program's priorities, successes, and challenges. As you review these materials, take note of priorities and gaps between program goals and current metrics. Ideally, you should look at the last two federal monitoring reports and a minimum of three years of program outcomes to understand trends in performance.
- **State law or state board policies.** Review these materials with an eye toward any implications for children and youth experiencing homelessness. Policies affecting

students experiencing homelessness may exist outside of the educational board. Therefore, it is helpful to familiarize yourself with additional policies related to the provision of shelter and housing, nutritional resources, child welfare, healthcare, and other supports.

- **Subgrants.** Review the subgrants your SEA has administered as part of your state's EHCY program to get a sense of your SEA's recent and ongoing priorities for the program.

Additional Resources

- To familiarize yourself with the legislative requirements for your role, we recommend you consult the [McKinney-Vento Act](#) directly. The NCHE [McKinney-Vento Homeless Assistance Act](#) webpage also contains non-regulatory guidance and key McKinney-Vento Act excerpts that may be helpful in your work.
- For a more detailed discussion of expectations in your role, NCHE has created the [10 in 10 Training Series](#) that covers essential topics.

Chapter 3: Understanding Homelessness

3.1 Executive Summary

A nuanced understanding of issues impacting homelessness is critical to your role as a state coordinator. This chapter offers foundational context to support the effective and fair administration of the EHCY program. The state EHCY program supports and builds capacity in the SEA and LEAs to effectively identify and serve students and families experiencing homelessness. In leading this work, you will need a strong understanding of the barriers that people experiencing homelessness navigate to obtain critical services.

IN THIS CHAPTER, WE WILL OUTLINE:

- differing approaches to defining homelessness,
- data trends highlighting the prevalence of children and youth experiencing homelessness and the causes of homelessness,
- educational barriers, and
- the importance of developing trauma-informed approaches for educators in the SEA and LEA.

3.2 Defining Homelessness

Legislative definitions are a starting point in understanding homelessness and operationalizing resources and support. In your work, consider the definition of homelessness, which identifies the children and youth eligible for services under the EHCY program. Subtitle VII-B of the McKinney-Vento Act defines homeless children and youth as: “Individuals who **lack a fixed, regular, and adequate nighttime residence**” (McKinney-Vento Act section 725(2)). Some children and youth experiencing homelessness face greater challenges as unaccompanied homeless youth (UHY), which the McKinney-Vento Act defines as “**a homeless child or youth not in the physical custody of a parent or legal guardian**” (McKinney-Vento Act section 725 (6)).

Under the McKinney-Vento Act, there is no age limit tied to eligibility for services through the EHCY program. Eligibility for EHCY services is based on eligibility for a free, appropriate public education, including preschool and extended special education services (McKinney-Vento Act section 721(1)). Chapter 5 of this Handbook will further explore the McKinney-Vento Act definition and specific provisions for the EHCY program, introducing resources to support you in determining student eligibility under the law.

Differing Definitions

In your work with interagency partners, you will encounter different legislative criteria that define eligibility for services (e.g., U.S.

Department of Housing and Urban Development).

Chapter 10: Purposeful

Collaboration offers more

information and resources to navigate these dynamics.

3.3 Prevalence of Children and Youth Experiencing Homelessness

To effectively lead this work, it is important to understand the prevalence of homelessness. In your work as a state coordinator, you will oversee and use state and local data to manage an effective EHCY program. Data collection and reporting are ongoing; in Chapter 8 of this Handbook, you can learn more about effective practices and expectations for your role in collecting, analyzing, and teaching others to use data to improve your EHCY program.

Statistics in the table below summarize demographic trends captured in national data summaries, which are published on the NCHÉ [Data and Statistics on Homelessness](#) webpage. The insights below introduce some of the lived experiences and learning needs of students that the EHCY program serves.

Measurable Impacts of Homelessness

The impact of homelessness on schools is ever-increasing.

The identified number of students who experienced homelessness increased by an average of 4.4% each year since School Year (SY) 2004-05.

Schools should adapt resources to meet the unique needs of their students who experience homelessness.

Students who experienced homelessness were disproportionately English Learners or students with disabilities compared to the overall student body.

3.4 Causes

To address possible misconceptions about the causes of homelessness, state coordinators can examine systems and individual vulnerabilities to housing insecurity in their states. This section offers a preliminary list demonstrating the range of factors that can increase an individual's or household's risk of experiencing homelessness. Consider this list a jumping-off point to guide your learning and provide direction for seeking out community-based organizations (CBOs) to serve students experiencing homelessness.

Economic, Environmental, Health, and Household Factors

Economic, environmental, health, and household factors also put individuals and families at risk of experiencing homelessness. For example, the national affordable housing crisis, under which median earnings have not kept pace with median rents, is an economic factor that puts families at risk of homelessness. Research from the National Low Income Housing Coalition (2023) found that "in no state, metropolitan area or country in the U.S. can a worker earning the federal, state or local minimum wage afford a modest two-bedroom rental home at fair market rent by working a standard 40-hour work week." This research estimated that 7.3 million additional housing units would be necessary to close the gap for low-income renters. Inflation, paired with increased job insecurity, unemployment, or chronic under-employment, makes working families vulnerable. Research indicates that at least 40% of individuals

reported wages in the same year they experienced homelessness (Meyer et al., 2021).

Health factors may also contribute to student homelessness. Personal or family illness—including unexpected serious illness, mental health crises, substance abuse, and/or short- or long-term disability—can pose significant financial and caregiving challenges (Khullar & Chokshi, 2018). Domestic, sexual, or other forms of interpersonal violence are another cause of homelessness (National Network to End Domestic Violence, 2025).

Natural disasters over time have increased in number, frequency, and severity, leading to many students losing their homes. As these events and environmental impacts worsen, research suggests that an increase in climate migration will result in increased homelessness (Tonn et al., 2021).

3.5 Educational Barriers

Students experiencing homelessness may face short- or long-term disruption to their education, both in and out of the classroom. Students:

- may be more likely to change schools frequently,
- may have other unmet basic needs (e.g., nutrition, access to medical care, etc.),
- may not have a place to do schoolwork outside of school or resources to complete schoolwork (e.g., Internet access, personal computer, etc.), and
- may lack a feeling of safety, security, and/or other conditions that facilitate learning.

Research in early childhood development demonstrates the importance of identifying and offering support for young children who experience homelessness before they enter preschool or kindergarten. Studies find that these young learners may begin their educational journey with cognitive delays, decreased classroom engagement, and difficulty interacting with teachers and peers (Sucsy, 2021).

To effectively support students experiencing homelessness in your schools, work with your colleagues in the SEA and your LEA partners to consider a broad spectrum of learning needs. Ensuring students experiencing homelessness have access to education is a first step. You

can prepare students for stronger outcomes by coordinating services with other government agencies, CBOs, or other direct service providers. This approach of securing wraparound services can take many forms to improve a student’s ability to learn and thrive. To learn more about these approaches, see Chapter 10: Purposeful Collaboration.

3.6 Importance of Trauma-Informed Approaches

Some students experiencing homelessness may experience trauma, which is linked to negative effects on student academic performance and learning outcomes. Trauma can adversely affect a student’s attention, memory, and cognition, as well as reduce a learner’s ability to focus, organize, and process information. Research studying adverse childhood experiences (ACEs) finds that exposure to a range of traumatic events, conditions, and challenges can impact physical and mental health outcomes into adulthood (CDC, 2023).

You play an important role in providing guidance and technical assistance to educators in your state program. In Chapter 6 of this Handbook, you will learn more about the legislative requirements and processes to develop and administer technical assistance and training for LEA partners. To best serve youth experiencing homelessness, you must work to build capacity with your SEA and LEA partners to ensure EHCY program activities employ trauma-informed approaches.

What Are Trauma-Informed Approaches?

Researchers and advocates increasingly recognize the importance of creating safe, supportive environments for traumatized students. Schools play a critical role in whole-child development, and educators can provide opportunities for learners to develop social, emotional, and behavioral skills (Terrasi & De Galarce, 2017).

The [National Child Traumatic Stress Network](#) offers ten essential elements for schools to implement:

Essential Elements of a Trauma-Informed School System			
1	Identifying and assessing traumatic stress.	6	Being culturally responsive.
2	Addressing and treating traumatic stress.	7	Integrating emergency management and crisis response.
3	Teaching trauma education and awareness.	8	Understanding and addressing staff self-care and secondary traumatic stress.
4	Having partnerships with students and families.	9	Evaluating and revising school discipline policies and practices.
5	Creating a trauma-informed learning environment.	10	Collaborating across systems and establishing community partnerships.

Implementing these trauma-informed approaches will enable educators to confront and address biases that may be held individually or within local systems that students and families experiencing homelessness must navigate. In your work to support, monitor, and improve EHCY program activities, engage your partners in critical reflection about the capacity and skills needed to ensure appropriate, trauma-informed approaches are in place within schools.

3.7 Considerations for Removing Barriers

As you lead your EHCY program, you should engage deeply with strategies to better understand and connect with the needs of the communities you serve. In your role, work with your LEA partners and local liaisons to directly engage and partner with students and families experiencing homelessness. You should also proactively collaborate with partners, including organizations led by and focused on serving those most impacted by homelessness.

To effectively lead the EHCY program, think critically about the barriers that students experiencing homelessness navigate. Barriers include policies and practices within the school and local community. Research shows that students experiencing homelessness are twice as likely as their peers to be chronically absent from school, and three times as likely to face disciplinary action (Dean, 2021). In your work within the SEA, with LEAs, CBOs, and interagency partners, consider how these policies and practices may be adjusted to deliver access to the “**same free, appropriate public education**” as provided to other children and youths” guaranteed by federal law (McKinney-Vento Act section 721(2)).

Key Resource:

The NCHE website includes many resources to support an approach to your work that is focused on fairness and opportunity, balanced to strengthen student outcomes in the EHCY program. Briefs, webinars, and other content can be explored by topic at this [NCHE Topics landing page](#).

Additional Resources

- NCHE Brief: [Children and Youth Experiencing Homelessness: An Introduction to the Issues](#)
- National Low Income Housing Coalition: [Out of Reach: The High Cost of Housing](#)
- Resources from [Eviction Lab](#)

Chapter 4: Organization of the EHCY Program

4.1 Executive Summary

This section describes the organization of the EHCY program at the federal, state, and local levels. It specifies the duties and responsibilities of the state coordinator and the state EHCY program as outlined in the McKinney-Vento Act.

IN THIS CHAPTER, WE WILL OUTLINE:

- the purpose of the various levels of the EHCY program,
- state EHCY program responsibilities that the McKinney-Vento Act requires in the state ESSA plans, and
- ways to learn about the unique organization and features of your state EHCY program.

4.2 Overview of Program Governance

The EHCY program is a shared responsibility across federal, state, and local actors. The U.S. Department of Education provides grants, oversight, and technical assistance (TA) to SEAs who develop and implement programs responsive to identified needs in their LEAs.

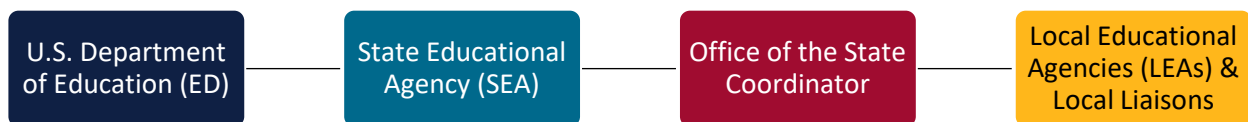


Figure 1: Governance Model for the EHCY Program

This shared responsibility requires each actor in the EHCY program to collaborate and continually assess the program's effectiveness from their role's vantage point. As a state coordinator, you are an essential bridge between a single SEA and the state's LEAs. While your seat is within the SEA, you partner directly with the Department to stay abreast of emerging trends, priorities, and strategies. You are the expert in your state context, responsible for distributing resources and knowledge within the SEA and to LEA partners, as well as for collecting critical data and insights from the LEAs to report back to the SEA and the Department.

4.3 Role of the U.S. Department of Education

The federal EHCY program in the Department is part of the [Office of Elementary and Secondary Education \(OESE\)](#), which provides coordinated policy development, performance management, TA, and data analysis services to support key reforms in states, leading to improved outcomes for all students.

The McKinney-Vento Act requires the Department to provide support and TA to SEAs to assist them in carrying out their responsibilities under the law (McKinney-Vento Act section 724(b)). To ensure that state EHCY programs are effective, the Department:

- provides formula grants to state EHCY programs;
- provides TA;
- manages a federal TA center, NCHE;
- conducts ongoing monitoring of state EHCY programs; and
- oversees state data collection.

In addition to these activities, the Department regularly coordinates with other federal programs and agencies serving children, youth, and families experiencing homelessness. While this interagency coordination is not mandatory, stronger intragovernmental relationships strengthen coordination and coherence of the supports that each program provides, from national strategies to state and local implementation.

4.4 Role of the State Education Agency

The McKinney-Vento Act outlines responsibilities held by the SEA and the state coordinator as a leader within the SEA.

These responsibilities should be carried out according to the SEA's State Plan and documented to assist you in evaluating the effectiveness of activities and planning for future improvements to the program. Such responsibilities include grant management, dispute resolution, and seeking TA. The SEA manages state-level activity funds as well as the sub-granting process to support LEAs in implementing aspects of the EHCY at the district and school levels (for more information, see Chapter 7). The SEA also manages disputes that may arise (for more information, see Chapter 11). As a state coordinator, you are also responsible for providing TA to LEAs and local liaisons (for more information, see Chapter 6). Furthermore, the state coordinator responds to inquiries and monitors LEAs with and without subgrants for McKinney-Vento Act requirements. Documenting the support you provide to LEAs and local liaisons in these categories is essential to ensure you are prepared for dispute resolution, local litigation, and responding to inquiries, subgrants, and federal monitoring to assess the effectiveness of the state EHCY program.

In 2017, each SEA submitted a consolidated state plan as part of the implementation of the Elementary and Secondary Education Act of 1965, as amended by ESSA. Each state plan included sections for specific federal programs, including the EHCY program, which responded to state plan requirements listed in the McKinney-Vento Act under section 722(g). Portions of the state plan mandated under the McKinney-Vento Act were peer-reviewed and approved by the Department's EHCY program. The McKinney-Vento Act portion of the consolidated state plan is the foundation for your work in ensuring that LEAs comply with legislative requirements. You should review your [SEA consolidated state plan](#) and include this information in your annual planning.

Key Resource

NCHE has created an orientation tutorial as part of the [10 in 10 Training Series](#), which provides an overview of McKinney-Vento Act requirements for the SEA Consolidated Plan for the EHCY Program.

4.5 Role of the Local Education Agency

Under the McKinney-Vento Act, LEAs are required to provide educational services to children and youth experiencing homelessness, as outlined in the law under the McKinney-Vento Act, section 722(g)(3). Through training and outreach to educators and community partners, LEAs play an important role in identifying students experiencing homelessness. This section will help you unpack the LEA’s role in the EHCY program, as well as introduce a key partner in your work—the EHCY local liaison.

The LEA’s key responsibilities include:

Topic	Legislative Requirements	MV Citation
Designate a Local Liaison	LEAs must designate a local liaison to implement EHCY programs and strategies.	Section 722(g)(1)(J)(ii)
School Stability	LEAs must maintain school stability by keeping the student in the school of origin or the local attendance area school according to the child’s or youth’s best interests.	Section 722(g)(3)(B)
Immediate Enrollment	LEAs must provide immediate enrollment and facilitate the transfer of records.	Section 722(g)(3)(C)
Maintain Student Records	LEAs must maintain records “ordinarily” kept by the school, such as immunization or other health records, birth certificates, guardianship records, and evaluations for special services or programs.	Section 722(g)(3)(D)
Dispute Resolution	LEAs must oversee dispute resolution for eligibility, enrollment, and school selection.	Section 722(g)(3)(E)
Protect Student Privacy	LEAs must maintain the privacy of a student’s homeless status.	Section 722(g)(3)(G)

The LEA is responsible for determining student eligibility for McKinney-Vento Act rights and services. To ensure that students experiencing homelessness do not experience disruptions in school and that all students have access to adequate and appropriate schooling, LEAs must support decision-making concerning school selection and enrollment. During this process, the LEA must act in accordance with McKinney-Vento Act guidance, which presumes that keeping the student in the “school of origin” is in the student’s best interest. For more information on LEA requirements under the McKinney-Vento Act, read the legislation section of the McKinney-Vento Act’s section 722(g)(3) or consult our [NCHE training module on EHCY program governance](#).

Definition: School of Origin

The term “school of origin” refers to the school a child or youth attended when permanently housed or the school where the child was last enrolled, including preschool.

To ensure that all students have continuous access to a quality education, LEAs are required by law to designate an appropriate staff person able to carry out required EHCY program duties, outlined under McKinney-Vento Act section 722(g)(1)(J)(ii). This LEA designee is the **local liaison** for the EHCY program and a key partner in your work. The local liaison implements programs and strategies within their district and community to drive the identification and provision of support for students experiencing homelessness. For more information on the duties required of the local liaison at the LEA, read the legislation section of the McKinney-Vento Act’s section 722(g)(6)(A) or consult our [NCHE training on overseeing LEAs](#).

Local homeless liaisons must provide training and resources to school personnel and educators to support the identification of students experiencing homelessness, aid them in outreach and the coordination of services with the parents or caretakers of students experiencing homelessness, and/or work directly with unaccompanied minors, per McKinney-Vento Act section 722(g)(6)(A)(ix).

Additional Resources

- NCHE Resource: [McKinney-Vento in ESSA State Plans](#)
- U.S. Department of Education Overview: [McKinney-Vento Education for Homeless Children and Youth Program](#)

Chapter 5: Understanding the McKinney-Vento Act

5.1 Executive Summary

The McKinney-Vento Act mandates the office of the state coordinator and shapes the EHCY program through requirements for services, ensuring students served by SEAs and LEAs have access to the same free and appropriate public education as provided to other children and youth.

State coordinators must navigate several federal laws to manage an effective EHCY program. However, the McKinney-Vento Act governs much of your day-to-day work.

IN THIS CHAPTER, WE WILL OUTLINE:

- the history and purpose of the McKinney-Vento Act,
- operating definitions essential to your work in identifying and serving students and youth experiencing homelessness through your state programs,
- key provisions of the McKinney-Vento Act, and
- additional resources to understand the law.

5.2 Purpose of the McKinney-Vento Act

The McKinney-Vento Act was first enacted in 1987 as a subsection of the Stewart B. McKinney Homeless Assistance Act. It was reauthorized in 2015 as Title IX, Part A of the Every Student Succeeds Act.

The McKinney-Vento Act ensures that children and youth experiencing homelessness can enroll in and attend school without barriers. Specifically, the Statement of Policy provides an overview of the purpose of the McKinney-Vento Act:

- (1) Each State educational agency shall ensure that each child of a homeless individual and each homeless youth has equal access to the same free, appropriate public

education, including public preschool education, as provided to other children and youths.

- (2) 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 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.
- (3) Homelessness is not a sufficient reason to separate students from the mainstream school environment.
- (4) Homeless children and youth 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 State academic standards to which all students are held (McKinney-Vento section 721).

As discussed in the last chapter, the McKinney-Vento Act establishes program governance and requirements for the EHCY program with clear mandates for the state coordinator of the EHCY program, the SEA, LEA, and local liaisons. In addition to setting expectations for administrators and educators, the legislation offers key definitions for terms related to homelessness, as well as provisions to ensure that all students have access to a quality education.

5.3 EHCY Program Definition of Homelessness

The McKinney-Vento Act contains one critical piece of information to guide your work in the EHCY program: the legislative definition of *homelessness*. All aspects of the EHCY program operate under this definition, including determining a student's eligibility for rights and services guaranteed by the McKinney-Vento Act. Please be aware that the work of other federal and state agencies may be mandated by other laws that define homelessness differently; for example, the U.S. Department of Housing and Urban Development (HUD) uses a different definition of homelessness for the provision of its services.

The McKinney-Vento Act defines homeless children and youth as follows:

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;
 - (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 Education 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).

5.4 Key Provisions Related to Rights of and Services for Children and Youth Experiencing Homelessness

The McKinney-Vento Act guarantees critical rights and services for children and youth experiencing homelessness, which are designed to ensure that these children can receive continuous, supportive services that enable them to be successful in school. There are several key provisions from legislation that you should be aware of, including:

Topic	Legislative Requirements	MV Citation
Identification	The Act requires LEAs to designate an appropriate staff person as the local homeless education liaison. Among this liaison’s responsibilities is a requirement to conduct outreach and coordination to support school personnel in the identification of students and youth experiencing homelessness.	Section 722(g)(6)(A)(i)
Immediate Enrollment	The Act requires the immediate enrollment of children and youth experiencing homelessness, even in the absence of records normally required for enrollment.	Section 722(g)(3)(C)(i)
School Selection	The Act mandates that LEAs must keep children and youth experiencing homelessness in their school of origin, to the extent feasible, except when doing so is contrary to the wishes of the parent or guardian (or, in the case of an unaccompanied homeless youth, against the youth’s wishes).	Section 722(g)(3)(A)(i)(ii) Section 722(g)(3)(B)
Transportation	To avoid further disruption to the education of students experiencing homelessness, the Act requires the LEA to provide or arrange transportation to and from the school of origin. If a student begins living in an area served by another LEA, the LEA of origin and the new LEA serving the student must agree to apportion the responsibility and costs for providing transportation, or—if an agreement is not reached—responsibility and costs will be shared equally.	Section 722(g)(1)(J)(iii) Section 722(g)(1)(J)(iii)(II) Section 722(g)(4)(A)
Academic Performance	The Act requires that students experiencing homelessness receive “comparable services” to other students in the LEA, including educational services provided under Title I, Part A, IDEA, English language learner supports, CTE programs, gifted and talented programs, and other supports.	Section 722(g)(4)(B) Section 722(g)(4)(C) Section 722(g)(4)(D)

Additional Resources

- Legislative Overviews
 - NCHE Webinar: [Basic Requirements of the McKinney-Vento Act](#)
 - NCHE Federal Legislation Webpage: [Key Pieces of Federal Legislation Related to CYEH](#)
 - Module Series: [10 in 10 Training Series](#)
 - Non-Regulatory Guidance: [EHCY Programs](#)
 - NCHE Brief: [Children and Youth Experiencing Homelessness: An Introduction to the Issues](#)
- Eligibility and School Selection Resources
 - NCHE Brief: [Determining Eligibility for McKinney-Vento Rights and Services](#)
 - NCHE Brief: [Confirming Eligibility for McKinney-Vento Rights and Services](#)
 - NCHE Resource: [Flowchart for McKinney-Vento Eligibility Determinations](#)
 - NCHE Briefs and Resources on [School Selection and Best Interest Determination](#)

Chapter 6: Technical Assistance and Training to Support LEAs and Local Liaisons

6.1 Executive Summary

A key responsibility of your role as a state coordinator is to provide training and ongoing technical assistance to support LEAs and local liaisons in implementing effective programs serving students experiencing homelessness.

IN THIS CHAPTER, WE WILL OUTLINE:

- the Office of the State Coordinator's statutory responsibility to provide supports to LEAs and local liaisons,
- strategies for supporting and engaging LEAs and local liaisons as partners, and
- recommended resources and trainings to share with LEAs and liaisons.

6.2 McKinney-Vento Act Requirements

The McKinney-Vento Act requires every LEA to designate a local homeless education liaison. The law states:

The local educational agencies will designate an appropriate staff person, able to carry out the duties described in paragraph (6)(A), who may also be a coordinator for other Federal programs, as a local educational agency liaison for homeless children and youths (McKinney-Vento Act section 722(g)(1)(J)(ii)).

The Act also requires state coordinators to provide professional development opportunities for LEA staff and local liaisons to assist them in identifying and meeting the needs of homeless children and youths, as well as in providing training on the definitions of terms related to homelessness (McKinney-Vento Act section 722(f)(6)). In addition, the law requires states to adopt policies and practices to ensure liaisons participate in professional development and other technical assistance activities (McKinney-Vento Act section

722(g)(1)(J)(iv)).

There are many activities to support LEA staff and local liaisons, which are generally required by federal monitoring indicators for the EHCY program. These include:

- providing ongoing TA to LEAs to ensure appropriate implementation of the statute;
- maintaining records of liaison participation in professional development activities;
- monitoring staffing changes for local liaisons;
- assisting new liaisons in learning their new responsibilities; and
- providing training and TA to LEAs to ensure state and local agencies serving families, children, and youth experiencing homelessness are aware of the rights of students experiencing homelessness and the services the LEA can provide them.

6.3 Working with Local Liaisons

The local liaison provides a single point of contact and a means for communicating changes in policy and practices. Local liaisons also identify challenges faced at the local level. State coordinators are legally responsible for providing technical assistance and support to LEAs. Local liaisons generally are the main points of contact between LEAs and the state coordinator.

Only a small percentage of LEAs have full-time staff dedicated to homeless education. The smaller the school district, the more likely the liaison's responsibilities will be added to a long list of duties held by one person at the district level.

To support a strong network of local liaisons, state coordinators keep accurate records that identify each LEA's local liaison. State coordinators must develop a system to track the assigned liaison in each district. You may collect and maintain these data through the consolidated grant, periodic data collection, or ongoing coordination with your data management team. This list will allow you to communicate easily with liaisons and ensure LEAs have a well-trained point of contact supporting EHCY programs. As mandated under the McKinney-Vento Act, you must publish an updated list of liaisons on the SEA website

annually (per McKinney-Vento Act section 722(g)(6)(B)).

6.4 Network of Support

State coordinators play a vital role in supporting all local liaisons; newly appointed liaisons may require the most immediate support to be onboarded as partners in the EHCY program. Here are some steps you can take to bring newly appointed liaisons up to speed on their responsibilities to serve students experiencing homelessness:

- proactively connect with them to introduce yourself;
- provide them with an orientation;
- connect them with another liaison for peer-to-peer networking;
- direct them to resources that can help onboard them to their role; and
- share how you are available to support them.

Key Resource

NCHE developed a [Homeless Liaison Toolkit](#) to support these critical partners in your state's EHCY program. This comprehensive resource can help both new and veteran local liaisons carry out their responsibilities.

Beyond supporting new liaisons, state coordinators can create a variety of supports for all local liaisons. To build strong partnerships with these critical collaborators at the LEA level, consider the following steps to build a network of support:

- **Support regional liaison collaboration.** Issues such as interdistrict transportation or unaccompanied homeless youth can be the impetus for a regional meeting that can evolve into a regular opportunity to meet, share challenges, and brainstorm solutions.
- **Identify veteran liaisons** who can field questions or provide training when the state coordinator is not available.
- **Appoint a mentor** for new liaisons.
- **Connect liaisons** with other agencies, intermediate education units, or universities that work with the state coordinator. (Chapter 10 of this Handbook provides a non-

exhaustive list of nonprofits, advocacy organizations, and professional associations that can support this work.)

- **Establish a listserv** or email distribution list for liaisons.
- **Encourage liaisons to contact you** with questions and concerns.
- **Provide liaisons with information on the National Center for Homeless Education (NCHE) Helpline**, which offers phone and email technical assistance, as well as other NCHE resources. You can call (305) 306-8495 or email NCHE.Helpline@safalpartners.com.
- **Encourage liaisons to [explore NCHE resources](#) and [sign up for the NCHE listserv](#)** to stay current on emerging issues, learning opportunities, legislative changes, and resources.
- **Use your SEA EHCY website to post SEA policies**, such as the dispute resolution policy, letter templates, links to NCHE trainings, and the LEA Toolkit.
- **Conduct periodic conference calls or virtual meetings** to discuss updates or current issues.
- **Use data to identify LEAs** with low participation in trainings or large numbers of complaints to target TA and support.

6.5 Trainings

Local liaisons can drive programs in their communities, directly impacting students experiencing homelessness. To be effective in this work, state coordinators must provide critical training and resources to liaisons.

You can create professional development opportunities by leveraging NCHE tools and materials. In particular, [webinars](#) on the following topics are helpful for quickly bringing new liaisons up to speed:

- understanding homelessness and the McKinney-Vento Act,
- understanding liaison responsibilities,
- analyzing LEA data, and

- developing collaborations and contracting with community-based organizations (CBOs).

As you prepare your trainings, you may consider:

- conducting statewide or regional trainings annually or semi-annually (in person or virtually),
- offering online modules with a follow-up to liaisons to determine their understanding and respond to questions,
- hiring and engaging parents or youth with lived experiences of homelessness to develop and lead trainings,
- supporting peer sharing by inviting veteran liaisons to present in trainings, and
- referencing NCHE training resources, such as publicizing NCHE webinars and sending updates with new NCHE trainings and resources as they become available.

NCHE's [Local Educational Agency Informal Needs Assessment](#) also supports needs assessment and program evaluation in building local EHCY programs. You may find this guide helpful in assisting LEAs to conduct annual formal or informal needs assessment activities. The U.S. Department of Education recommends that subgrantee LEAs conduct more comprehensive and formal needs assessments at least once every three years.

6.6 Checking Your Progress

Periodically, you should assess your program's impact and effectiveness. In addition to more rigorous needs assessment and program review processes, you may ask yourself the following questions to ensure your LEA support is effective in improving the overall strength of the state EHCY program:

- What training opportunities has the SEA provided for liaisons in the past year?
- What percent of liaisons from the SEA participated in EHCY trainings in the past year? Are there any new liaisons who haven't attended a SEA-approved training?
- Is the local liaison list current?
- In which LEAs is the identification of students experiencing homelessness low, and how does the SEA reach out to them?

Look for other critical data points to understand the complete picture. Student achievement data, data on chronic absenteeism, and other academic indicators can also be helpful. For more information, see Chapter 8 of this Handbook, which includes more information on collecting and leveraging data, and Chapter 12, which discusses using data for program improvement.

Additional Resources

- NCHE Resources: [Self-Paced Webinars](#)
- NCHE Brief: [Local Homeless Education Liaisons: Making the Right Selection and Supporting Their Effectiveness](#)
- NCHE Resource: [Homeless Liaison Toolkit](#)
- NCHE Resource: [Local Education Agency Informal Needs Assessment](#)

Chapter 7: Managing McKinney-Vento Subgrants

7.1 Executive Summary

A major responsibility of the state coordinator's office is the management of EHCY subgrants to LEAs. This chapter provides an overview of this important function, which drives activity, resourcing, and outreach at the local level to serve students experiencing homelessness.

IN THIS CHAPTER, WE WILL OUTLINE:

- McKinney-Vento Act requirements for subgrants to LEAs,
- how subgrant funds can be spent,
- the subgrant application process, and
- the state coordinator's role in overseeing LEA subgrants.

7.2 McKinney-Vento Act Requirements

Federal law mandates that the office of the state coordinator allocate and distribute funds to LEAs via subgrants and oversee subgrants throughout the state to fund and implement the EHCY program. As mandated under the McKinney-Vento Act, an **SEA must annually award subgrants to LEAs:**

“for the purpose of facilitating the identification, enrollment, attendance, and success in school of homeless children and youths” (McKinney-Vento section 723(a)(1)).

When you review your state EHCY program funding, keep in mind that **SEAs must distribute no less than 75 percent of their annual McKinney-Vento allocation in subgrants** to LEAs (McKinney-Vento Act section 722(e)(1)).

Additional Considerations: Applications that require great capacity to complete may be manageable for large districts with professional grant-writing staff, but challenging for smaller districts. Streamlined grant processes can be designed to yield more successful applications from small and rural districts.

These subgrants are competitive and awarded based on need and application quality (McKinney-Vento Act section 723(c)(1)). Subgrant periods may be for up to three years (McKinney-Vento Act section 723(a)(4)), although subgrant funds should be distributed annually. In other words, the competitive process and selection of LEAs can be completed once every two or three years, with funds awarded annually.

There are trade-offs to consider in deciding whether states should implement a three-year subgrant cycle or a shorter one- or two-year cycle. The longer cycle allows for improved program continuity and enables state coordinators to monitor and assist subgrantees in strengthening their programs during the implementation phase. In addition, the application and award processes require significant time and effort at the state and local levels. Any benefits from conducting the processes more frequently than every three years do not outweigh the time and effort taken away from providing programmatic activities and services.

7.3 LEA Subgrant Applications

State EHCY programs must conduct award competitions for LEAs and award subgrants based on need and the quality of the application submitted (McKinney-Vento Act section 723(c)(1)). The application and awards should conform to the SEA's grant processes, as well as comply with the McKinney-Vento Act.

SEAs must develop an LEA subgrant application that includes:

- an assessment of the educational and related needs of children and youth experiencing homelessness in the area the LEA serves,
- a description of services and programs for which assistance is sought,

- a signed assurance that the LEA’s combined fiscal effort per student, or aggregate expenditures of the LEA and state with respect to the provision of free public education by the LEA for the fiscal year preceding the fiscal year for which the determination is made, was not less than 90 percent combined fiscal effort or aggregate expenditures for the second fiscal year preceding the fiscal year for which the determination is made,
- an assurance that the applicant complies with, or will use the requested funds to comply with, paragraphs (3) through (7) of Section 722(g),
- a description of policies and procedures to ensure 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 pursuant to paragraphs (1) and (3) of Section 722(f), and
- an assurance that the LEA will meet the requirements of Section 722(g)(3) (Section 723(b)).

McKinney-Vento Act, Section 722

Refer to this section of the law for statutory language and citations to support your work in administering subgrants.

For additional guidance, refer to the [Office of Elementary and Secondary Education \(OESE\) landing page](#) for guidance on EHCY grant requirements.

7.4 The Award Process

In addition to complying with the McKinney-Vento Act requirements, you must conduct the subgrant process in accordance with SEA policies and procedures. Each SEA governs a process for granting funds, including the development of the application, reviewing submissions, and awarding funds.

States may choose to award subgrants to a small number of LEAs with a high need for services to support children and youth experiencing homelessness, or they may award a larger number of subgrants with smaller amounts of funds.

7.5 How Subgrants Can Be Used

Subgrants are designed to expand or improve upon services provided as part of a school's regular academic program but not to replace any existing services (McKinney-Vento Act section 723(a)(2)(A)(iii)). The services may be provided through programs on school grounds or other facilities and must, to the maximum extent practicable, be provided through existing programs that integrate homeless children and youth with non-homeless children and youth (McKinney-Vento Act section 723(a)(2)(A)(i)(ii)).

Key Resource

NCHE offers a [McKinney-Vento Subgrant Authorized Activities](#) webpage for easy reference and partner sharing, as well as a [Use-of-Funds Tip Sheet for Serving Children and Youth Experiencing Homelessness with Education for Homeless Children and Youth \(EHCY\) Program Funds](#).

If services are provided on school grounds, recipients may include other children and youth who are at risk of failing in or dropping out of school (McKinney-Vento Act section 723(a)(2)(B)(i)). However, the subgrant's main purpose is to meet the needs of children and youth experiencing homelessness. In addition, services provided through the subgrants in schools should not segregate children and youth experiencing homelessness, except for short periods of time for health and safety emergencies or to provide temporary, special, and supplementary services to meet the unique needs of homeless children and youths (McKinney-Vento Act section 723(a)(2)(ii)).

The law includes 16 authorized activities for McKinney-Vento Act subgrants (McKinney-Vento Act section 723(d)), detailed in the following table. These authorized activities offer a guide for how funds should be spent.

McKinney-Vento subgrants may be authorized for the provision of...

1. tutoring and supplemental instruction	9. the payment of fees and other costs associated with tracking, obtaining, and transferring records to enroll students
2. expedited evaluations of students' strengths and needs	10. education and training for parents and guardians of homeless children and youths
3. professional development for educators and support personnel	11. development of coordination between schools and agencies providing services
4. referral services for medical, dental, mental, and other health services	12. specialized instructional support services, including violence-prevention counseling
5. assistance to defray costs of excess transportation	13. activities to address particular needs that may arise from domestic violence and parental mental health or substance abuse problems
6. developmentally appropriate early childhood programs for preschool-aged children experiencing homelessness	14. adaptation of space and purchase of supplies for any non-school facilities
7. services and assistance to attract, engage, and retain students experiencing homelessness	15. school supplies to be distributed at shelters, temporary housing facilities, or other locations
8. before- and after-school mentoring and summer programs	16. other extraordinary or emergency assistance to enable students to attend and participate fully in school activities

7.6 Overseeing LEA Subgrants

State coordinators are responsible for the ongoing oversight of LEA grantees. LEA grantees are considered subrecipients of federal funds that pass to them through the SEA. This relationship is established under Uniform Guidance, the federal framework for federal grants

management in the Code of Federal Regulations (CFR), which provides the spending rules for federal awards.

State coordinators should become familiar with their SEA's budgeting and fiscal oversight processes, which will provide the guidance and support needed to conduct the subgrant process and oversee the awards in compliance with the Uniform Guidance. It is recommended that you monitor the obligation and drawdown rates of subgrants at a minimum quarterly, with more frequent reviews close to end-of-cycle fiscal deadlines.

In addition, state coordinators should provide training and support for subgrantees on permissible uses of funds, oversee budget expenditures to ensure they are allowable and align with the activities in their application, and conduct periodic monitoring (on-site at least once every subgrant cycle) of the subgrantee's EHCY program.

Additional Resources

- NCHE Brief: [*Use-of-Funds Tip Sheet for Serving Children and Youth Experiencing Homelessness with Education for Homeless Children and Youth \(EHCY\) Program Funds*](#)
- EHCY Non-Regulatory Guidance: [Sections G and H](#)
- NCHE Resource: [16 Authorized Activities for McKinney-Vento Subgrants](#)
- OESE Resource: [EHCY Guidance, Legislation and Regulations](#)

Chapter 8: Collecting and Using Data

8.1 Executive Summary

When the McKinney-Vento Act was first enacted, states were not required to collect data related to the education of students who experience homelessness, despite data playing an important role in ensuring Congress passed the law. Initially, the program primarily focused on the identification and enrollment of students. As the law has been reauthorized and its focus has been expanded to include students' success once they are in the classroom, so has the importance of collecting and using data. Data are a multi-purpose tool that can be used to understand the needs of students, educate stakeholders, advocate for new strategies, evaluate interventions, and celebrate accomplishments. This chapter highlights the legal requirements that shape the state coordinator's role in ensuring LEAs and the SEA collect quality data.

IN THIS CHAPTER, WE WILL OUTLINE:

- McKinney-Vento Act provisions related to collecting data,
- what data are collected,
- what happens to data once they are collected, and
- where to access data-related resources.

8.2 McKinney-Vento Act Requirements

The first state coordinator responsibility listed in the McKinney-Vento Act is gathering and making “publicly available reliable, valid, and comprehensive information on”:

- the number of students who experience homelessness within the state,
- the nature and extent of problems students experience in accessing a public education,
- special needs and barriers to enrollment experienced by students who are homeless,
- progress made in addressing such problems, and
- success achieved in identifying students without homes and ensuring they have access, stability, and success in school (McKinney-Vento Act section 722(f)(1)).

Additionally, state coordinators are charged with collecting and reporting data as requested by the Secretary of Education to assess the educational needs of students who experience homelessness (McKinney-Vento Act section 722(f)(3)). To meet these requirements, the McKinney-Vento Act requires state coordinators to coordinate and collaborate with LEA liaisons as well as community and school personnel who are responsible for providing education and related services to students who experience homelessness (McKinney-Vento Act section 722(g)(6)(C)). Beyond the requirements included in the McKinney-Vento Act, Uniform Guidance (2 C.F.R. Part 200) sets requirements and guidelines for federal grants. To ensure that taxpayer funds are used responsibly, Uniform Guidance requires the assessment and monitoring of fiscal and performance risk indicators when SEAs issue funds to LEAs. Assessment and monitoring ensure that expenditures are reasonable and necessary to meet the McKinney-Vento Act's goals and that districts not only comply with the law but also develop interventions likely to result in student success.

8.3 Putting Requirements Into Action

While the law's requirements are straightforward and clear, putting those requirements into action is not so simple. State coordinators are responsible for ensuring that data are collected, reported, and used; however, they do not design the student information systems used to collect that information and often do not directly report data to the Department. To ensure that this process and students who experience homelessness are successful, state coordinators must:

- Educate liaisons, LEA data stewards, and SEA data stewards on required data elements, deadlines, and appropriate data notes.
- Negotiate changes to the student information system and train LEA staff to ensure changes will not degrade data quality.
- Review data before its submission to the Department.
- Work with liaisons and data staff to correct data when necessary and identify reasons for data trends.
- Work with ED Facts coordinators and consolidated state performance report (CSPR) coordinators to submit data and related notes to the Department.
- Adapt annual technical assistance work plans and LEA monitoring based on data.

In addition to the previously noted items, the most significant threat to data quality is a failure to communicate with LEA and SEA staff. Communication about the why, how, what, and “what now” of data should be constant. This type of communication will ensure that data reporting requirements are completed and will raise awareness of the impact of state-level activities, the needs of students, and the impact of district interventions and policies. Tapping into additional data points, including poverty, homelessness, discipline, and types of special education needs, will also help state coordinators define the capacity and programmatic needs of both the SEA and the LEAs. By defining the work in measurable ways, state coordinators promote the EHCY program’s credibility and integrity, decreasing institutional barriers for students who experience homelessness.

8.4 What Data Are Collected

Required Data Collections Related to Students Experiencing Homelessness	
Enrolled	
<ul style="list-style-type: none"> • Number of students by grade • Number of students by primary nighttime residence • Number of students in subgroups • Number of students by race/ethnicity 	
Served	
<ul style="list-style-type: none"> • Number of young children served by McKinney-Vento subgrants • Number of students served by Title I targeted assistance and schoolwide programs 	
Fiscal	
<ul style="list-style-type: none"> • Number of LEAs that receive McKinney-Vento subgrants • Title I, Part A set-aside allocations to serve students who experience homelessness 	
Outcomes	
<ul style="list-style-type: none"> • Number of chronically absent students • Number of students who graduated, number of students who were in graduation cohorts, and adjusted cohort graduation rates (ACGRs) 	

- Number of students who participated in, received valid scores on, and achieved proficiency on statewide assessments in mathematics, reading language arts, and science

8.5 How Data Are Used

One of the first concerns raised when discussing data is how data will be used. The concern is that LEAs and SEAs will spend significant time and effort collecting data only to discover that it is never used. However, knowing that data has always been a robust part of the EHCY program may ease those concerns. Before the existence of the McKinney-Vento Act, reports indicating that less than 50% of children and youth who experienced homelessness attended school helped justify the need for the law. By the time the first report to Congress was made, that number had increased to more than 86% of children and youth, demonstrating the powerful impact the law could make in a short amount of time (Child Welfare League of America, 1988; ED, 2000).

Since the early days of the EHCY program, data technology has expanded considerably, promoting the development of student information systems and the EDPass system, which is part of the broader [EDFacts Initiative](#) that the Department uses to collect data from SEAs. As a result, the Department and NCHE make data available to the public and to state coordinators in several ways, including:

- The [ED Data Express website](#), which provides the public with access to privacy-protected data on the enrollment of students who experience homelessness, students served by McKinney-Vento Act subgrants, LEAs that receive McKinney-Vento Act subgrants, absenteeism data, and ACGR data.
- A password-protected website that includes LEA-level data workbooks and Tableau maps, which are available only to state coordinators of record. Contact NCHE.help@safalpartners.com if you are a state coordinator of record and do not have access to this website.

- NCHE’s [Data and Statistics on Homelessness](#) webpage, which includes annual reports and federal data summaries on the number of students who experience homelessness.

In addition to the ways previously listed, the Department has established indicators under the Government Performance and Results Act (GPRA). These indicators focus on the identification of students who experience homelessness, the performance of students on statewide assessments in grades 3–8, the ACGR of students who experience homelessness, and chronic absenteeism rates. The Department includes these indicators each year in its annual budget request, which is located on the [Budget homepage for the U.S. Department of Education](#).

In addition to using data to identify trends in training and technical assistance needs and monitoring risk, it is important to be familiar with data on students who experience homelessness, as this is an area of interest to stakeholders, community agencies, policymakers, and the general public. For example, it is not uncommon to receive data-related requests during the state legislative season or from reporters who publish stories either at the start of the school year or during Hunger and Homelessness Month.

Additional Resources

- NCHE [Data Collection Briefs](#)
- NCHE [Slide Templates for Using Data in Trainings and Presentations](#)
- NCHE [Data Intervention Guide: Digging Deeper with Data](#)
- National Low Income Housing Coalition [Out of Reach Report](#)
- Research and resources from [The Eviction Lab](#)
- U.S. Housing and Urban Development [Annual Homeless Assessment Reports](#)

Chapter 9: LEA Monitoring

9.1 Executive Summary

Program monitoring occurs throughout all levels of government, including federal, state, and local educational agencies. The intention of monitoring is to ascertain and analyze the degree of policy and program implementation. As a state coordinator, you are responsible for monitoring LEAs to gauge the effectiveness and fidelity of EHCY program implementation in accordance with federal mandates.

While monitoring focuses on federal and state statutory and regulatory compliance to ensure all partners are aware of and appropriately conducting their program responsibilities, LEA monitoring also provides an opportunity to deepen your understanding of local strategies to support students experiencing homelessness. This process can be collaborative, focusing on deepening partnerships and finding opportunities for the most significant impact.

IN THIS CHAPTER, WE WILL OUTLINE:

- what the law requires for monitoring,
- how to select LEAs for monitoring,
- approaches to LEA monitoring,
- the LEA monitoring protocol,
- how to prepare to monitor LEAs, and
- how to prepare LEAs for monitoring.

9.2 McKinney-Vento Act Requirements

Monitoring LEA EHCY programs for compliance with the McKinney-Vento Act is a key responsibility for state coordinators. You must “provide technical assistance to and conduct monitoring of local educational agencies” (McKinney-Vento Act section 722(f)(5)). This provision applies to LEAs both with and without McKinney-Vento Act subgrants.

Effective practice recommended by the U.S. Department of Education suggests that all LEAs should be monitored regularly. Many states conduct on-site monitoring every three years or more frequently for LEAs with McKinney-Vento Act subgrants. Monitoring may be conducted

remotely through a document and data desk review, and interviews may be conducted remotely via telephone or audiovisual online applications.

Federal law does not specify what SEA monitoring of LEAs must entail. However, to be effective, LEAs must be notified of the monitoring event. They must also be provided with the monitoring results and recommendations for program improvements. Federal non-regulatory guidance suggests a monitoring protocol that includes: a formal letter of notification; protocols for interviews, observations, and document review (as applicable); a written report indicating whether requirements were met or corrective actions are required; and a process for resolving corrective actions (non-regulatory guidance, Question E-9).

9.3 Selecting LEAs for Monitoring

The Department recommends that SEAs prioritize monitoring LEAs at the greatest risk of non-compliance with the McKinney-Vento Act. A checklist for risk factors to consider may include:

- amount of time since the LEA was last monitored,
- number of findings in the previous monitoring,
- indications that the LEA may be under-identifying homeless students,
- number of complaints received at the state level related to serving children and youth experiencing homelessness,
- quality of data submitted to the SEA and the Department,
- amount of turnover in the local liaison position,
- liaison participation in professional development offerings, and
- for subgrantees, submission of required records, end-of-year reports, and appropriate use of funds, including timely expenditures.

9.4 Approaches to LEA Monitoring

A state's best approach to LEA monitoring depends on numerous contextual factors, such as the state's size, the time allotted for the position of state coordinator, and the state's system for federal programs monitoring (e.g., separate monitoring for each program or consolidated monitoring).

The following approaches will help you weigh the advantages and disadvantages of different LEA monitoring methods. In addition to the time, effort, and resources you have available for monitoring, you should also consider the relationships with local liaisons and the risk of LEA noncompliance. A more time-intensive approach to monitoring the current year could yield more nuanced insight, deeper partnerships, and stronger LEA performance in years to come.

Approach	Description	Considerations
On-Site Monitoring	On-site monitoring is considered the best way to enable a state coordinator to gain firsthand knowledge of an LEA EHCY program. While other approaches can offer some time-saving solutions that are economical and efficient, in some instances, there is no substitute for an on-site monitoring visit, particularly in LEAs where there is significant non-compliance.	High effort, high potential for impact. Though time-intensive, the SEA retains control and gains direct insight through observation.
Desk Monitoring	Desk monitoring entails a review of LEA data, documents, records, and needs assessment information to determine the level of compliance with the law. The state coordinator sends the local liaison a list of documents to provide to the SEA for review. Desk monitoring is usually combined with either an on-site or remote interview of LEA staff following the review of documents.	Efficient, data-driven. Lower effort yields limited insight without stakeholder feedback. LEA cooperation is needed. Follow-up often occurs.
Remote Monitoring	Remote monitoring through video conferencing enables a state coordinator to conduct interviews with a range of stakeholders. This approach is best utilized in combination with a review of data and documents before the meetings. State coordinators can alternate desk monitoring and on-site visits with an LEA or conduct remote reviews of only those LEAs with the least risk for non-compliance.	Targeted, stakeholder-driven. This approach is efficient, but is best suited to LEAs with responsive, strong partners.

Approach	Description	Considerations
Consolidated Federal Monitoring	Some states combine their monitoring of federal programs into one consolidated monitoring process. Each program coordinator develops a set of questions related to their program and provides them to a team that visits each LEA. While spreading the monitoring across all federal program staff increases the breadth of the monitoring, there are two disadvantages to this approach: (1) a federal program staff member may not be very familiar with the EHCY program, and (2) because consolidated monitoring includes several federal programs, the time allotted to the EHCY program may be minimal.	Risk of limited or less nuanced EHCY program insight. Consolidated monitoring provides a broad picture of LEA performance and efficiency for SEA partners, but less focus may be directed to the EHCY program.
Contract Monitoring	State coordinators may contract with external agencies or former local EHCY program staff to conduct LEA monitoring. Contractors must be very familiar with the EHCY program and well-trained in the monitoring process.	Mixed content knowledge poses risks. Trained third-party contractors and former staffers may lack recent context on EHCY initiatives and priorities.
Regional Monitoring	State coordinators convene a group of local liaisons to discuss compliance challenges and conduct individual interviews with each one. This regional monitoring approach can occur as a standalone activity or be scheduled in conjunction with regional trainings when the state coordinator is traveling to provide ongoing technical assistance.	Efficient approach with less individual attention for LEAs. This approach saves time and costs, but LEAs and liaisons receive less direct attention and support.

9.5 LEA Monitoring Protocol

Once you have selected your monitoring approach, you will need to revisit your LEA monitoring protocol. An effective LEA monitoring protocol should include a set of questions that capture program requirements and the LEA's implementation of activities that meet those requirements. The questions should represent the law and guidance while also capturing an accurate assessment of program implementation.

Key Resource

Many SEAs model their monitoring protocols based on the Department's priorities. You can access sample documents on NCHE's [Monitoring and Program Evaluation](#) webpage.

State coordinators should ensure the following requirements in the McKinney-Vento Act are represented in the protocol: the State Plan (McKinney-Vento Act section 722(g)(1)); LEA requirements (McKinney-Vento Act section 722(g)(3)); coordination requirements (McKinney-Vento Act section 722(g)(5)); and local liaison duties (McKinney-Vento Act section 722(g)(6)). Since Title I, Part A is required to coordinate with local liaisons to determine the amount and use of the reserved funds, the monitoring protocol should also include questions related to this coordination to ensure the per-pupil allocation of funds is sufficient to meet identified needs. The amount of the set-aside may be based on a needs assessment and should be determined in coordination with the local liaison. The SEA should ensure that all LEAs that have identified homeless children and youth and receive Title I, Part A funds have an EHCY set-aside, and that per-pupil amounts do not vary widely throughout the state. For more information, consult the NCHE Brief [Serving Children and Youth Experiencing Homelessness Under Title I, Part A](#).

The Department promotes the provision of wraparound services and contracting with community-based organizations to enable LEAs to expand the range of their services for students experiencing homelessness. The protocol should address both topics of coordination and collaboration of LEAs and other local agencies and organizations serving children and youth experiencing homelessness. Additional questions for subgrantees should

include those relating to fiscal management and carrying out specific program activities approved in their application for funding. Many LEA monitoring protocols are organized by sections that include the McKinney-Vento Act requirement, what the SEA will accept as evidence of implementation of the requirement, guiding questions, and space for monitors to record their responses.

9.6 Preparing to Monitor an LEA

As you prepare to monitor an LEA, you should review data, documents, reports, and records to ensure an informed and clear understanding of the challenges and opportunities for implementing the EHCY program. Here are three steps you can take:

Monitoring Step	Detail
Review LEA data	Review EDPass and poverty data, then note LEAs that do not identify or under-identify students experiencing homelessness. (See Chapter 12 on using data for program improvement.)
Review LEA documents	Review LEA documents, reports, and records, including the following items commonly requested from LEAs scheduled for monitoring: <ul style="list-style-type: none"> • local liaison position description and time allotted to the position, • enrollment residency questionnaire, • LEA board policies related to the EHCY program, including the dispute policy, • agendas and participant logs for training related to children experiencing homelessness and the McKinney-Vento Act requirements, • phone and email logs for tracking barriers and complaints, • dispute records, • posters, brochures, flyers, resource lists that are given to identified families and youth, or links to webpages that include information for parents and youth experiencing homelessness, • Title I, Part A set-aside amount, including how the amount was determined and how the funds will be used, and • transportation records for children and youth experiencing homelessness to and from the school of origin.
Identify areas of concern or commendation	Identify areas of concern or commendation related to the McKinney-Vento Act for further investigation during a remote or site visit, which can be incorporated into the protocol.

9.7 Preparing LEAs for Monitoring

The best way to proactively prepare LEAs for monitoring is through your ongoing work to support LEAs and local liaisons with technical assistance, training, and guidance in implementing the EHCY program. In your relationship with LEA partners, you should be consistent in referring to EHCY mandates, non-regulatory guidance, and other foundational program documents. Returning to the legislation will create a mutual understanding of program expectations, roles, and requirements. In your role as a state coordinator, you should offer responsive technical assistance as compliance issues arise. Document these touchpoints as part of your ongoing support (outlined in Chapter 6).

Within the SEA, you can lead annual trainings focused on McKinney-Vento Act provisions and ways LEAs must comply with the law. Reminding your colleagues within the state office about the EHCY program requirements will also increase LEA compliance and coordination across programs. The SEA should make the LEA monitoring protocol available, which helps LEAs understand the requirements they must meet as well as the documents and records they must maintain for review when monitoring occurs.

The SEA must provide a letter of notification to the local liaison and the superintendent when they are selected for monitoring. The letter should include complete details on the type of monitoring, dates when the monitoring will occur, and what tasks the LEA must complete to prepare for monitoring, such as compiling documents for review or arranging interviews. Some SEAs provide a webinar to prepare LEAs who are selected for monitoring. State coordinators should emphasize that, in addition to identifying compliance issues, monitoring provides opportunities for SEAs to identify technical assistance needs and support LEAs to become compliant with the law. Ensure your LEA partners understand how you will provide feedback after the monitoring event occurs. This feedback can take any form that summarizes findings and recommends corrective actions. You may choose to issue this feedback in a formal report or as informal communication between the SEA and LEA.



Additional Resources

- EHCY Non-Regulatory Guidance: [Section E-9](#)

Chapter 10: Purposeful Collaboration

10.1 Executive Summary

Interagency and cross-system collaboration to provide wraparound services can ease transitions for highly mobile populations, connecting them to resources that ensure children and youth experiencing homelessness have access to healthcare, nutrition, housing, and other support services in addition to the academic support they receive at school. By building these relationships or partnerships, you can contribute to developing an interagency or cross-program safety net that can prevent children, youth, and their families from remaining in or transitioning deeper into homelessness and the homeless assistance system.

As a state coordinator, collaborating is essential to your day-to-day job. Whether engaging in federally mandated communication with key stakeholders or developing deeper partnerships within communities to ensure the effectiveness of your state's EHCY program, you and the partners you collaborate with share a common goal of supporting students and families experiencing homelessness. Sharing resources to provide wraparound services can effectively and efficiently support this goal. This chapter provides information and helpful framing for intentionally and strategically collaborating within and across systems to achieve the greatest impact for the students you serve.

IN THIS CHAPTER, WE WILL OUTLINE:

- requirements for collaboration under the McKinney-Vento Act,
- key areas for interagency collaborations,
- why effective collaboration is necessary, and
- the outcomes of effective collaboration.

10.2 McKinney-Vento Act Requirements

Interagency and cross-system collaboration are critical components of your responsibility as a state coordinator under the McKinney-Vento Act. The McKinney-Vento Act specifies a set of role groups, programs, and agencies with whom state coordinators must collaborate, as outlined in the table below.

Collaboration Mandated Under the McKinney-Vento Act (Section 722 (f)(4))	
Collaborator Type	This includes...
Educators	<ul style="list-style-type: none"> • teachers • special education personnel • administrators • child development and preschool program personnel
Service providers	<ul style="list-style-type: none"> • public and private child welfare and social service agencies • juvenile and family courts • agencies providing mental health services • domestic violence agencies • childcare providers • runaway and homeless youth centers • providers of services and programs funded by the Runaway and Homeless Youth Act (McKinney-Vento Act section 5701 et seq.)
Providers of emergency, transitional, and permanent housing	<ul style="list-style-type: none"> • public housing agencies • shelter operators • operators of transitional housing facilities • providers of transitional living programs for young people experiencing homelessness
Local liaisons	<ul style="list-style-type: none"> • LEA liaisons designated under subsection (g)(1)(J)(ii) for homeless children and youths
Community organizations	<ul style="list-style-type: none"> • community organizations and groups representing students experiencing homelessness and their families
Additional Interagency Coordination Mentioned in the McKinney-Vento Act	

Collaboration Mandated Under the McKinney-Vento Act (Section 722 (f)(4))

Collaborator Type	This includes...
	The McKinney-Vento Act also requires state coordinators to “coordinate with state and local housing authorities responsible for developing comprehensive affordable housing strategies under Section 105 of the Cranston/Gonzalez National Affordable Housing Act (P.L. 101-625) to minimize educational disruption for children and youths who become homeless” (McKinney-Vento Act section 722(g)(5)(b)) .

The legislation outlines a broad set of stakeholders, including colleagues within your SEA, LEAs, other governmental agencies, direct service providers, and community-based organizations. The following sections of this chapter offer suggestions for managing these connections, which may require expanding circles of influence and purposeful outreach.

10.3 Essential Interagency Collaborations

A significant part of your daily job as a state coordinator will be collaborating with other government agencies that share a common goal of supporting children and youth. The non-regulatory guidance that the U.S. Department of Education publishes recommends that state coordinators:

- coordinate with state and local housing agencies as well as other representatives of health and other services, including runaway and homeless youth grantees, and
- coordinate and consult with state and local policymakers to ensure legislation and policies do not create barriers to the education of homeless children and youths.¹

The table below highlights mandated coordination between EHCY and other educational programs. For several of these programs, NCHE has published briefs that can provide information and resources to support your work.

¹ Page 14 of the [Education for Homeless Children and Youths Program Non-Regulatory Guidance](#) (question E-8) outlines the state coordinator’s responsibilities for coordinating services.

Required Coordination with Educational Programs

Partner	Legal Citation	Description	NCHE Resource
Title I, Part A	McKinney-Vento Act and Title I Section 722(g)(6)(C)	Title I, Part A of the Elementary and Secondary Education Act, as amended by ESSA, provides financial assistance through SEAs to LEAs and schools with high numbers or high percentages of children experiencing poverty, helping ensure all children meet challenging academic standards. Title I, Part A includes specific requirements for collaboration with McKinney-Vento Act programs to serve children and youth experiencing homelessness.	NCHE page on Title I, Part A
IDEA	Individuals with Disabilities Education Act (IDEA), Part B Section 1412 (a)(21)(B)(v)	The Individuals with Disabilities Education Act (IDEA) is the nation's federal special education law that ensures public schools serve the educational needs of students with disabilities. IDEA includes specific provisions related to special education for students experiencing homelessness. Children and youth ages 3-21 receive special education and related services under IDEA, Part B. Infants and toddlers from birth to age 2 and their families receive early intervention services under IDEA, Part C.	NCHE page on IDEA

Required Coordination with Educational Programs

Partner	Legal Citation	Description	NCHE Resource
Head Start	McKinney-Vento Act and Head Start Section 1302.53 (a)(2)(vi)	<p>With increasing focus on early childhood education, Head Start is a key partner supporting early care and education for young children experiencing homelessness. This partnership can take various forms. Advisory councils authorized under Head Start may require homeless education expertise. State coordinators may serve on these councils, conduct joint trainings, or jointly develop a state memorandum.</p> <p>State childcare agencies and administrators of the U.S. Department of Health and Human Services overseeing the Childcare and Development Fund are also critical partners to ensure that serving young children experiencing homelessness is part of the discussion.²</p>	<p>Supporting Young Children Experiencing Homelessness</p>
Career Technical Education	Perkins Career and Technical Education Act (reauthorize d Perkins V)	Perkins V, the reauthorization of the Perkins Career and Technical Education Act in 2018, includes new provisions to help young people experiencing homelessness access and succeed in career and technical education (CTE) programs. These provisions include designating individuals experiencing	<p>NCHE page on Strengthening Career and Technical Education for the 21st Century Act</p>

² Page 37 of the [Education for Homeless Children and Youths Program Non-Regulatory Guidance](#) (question L-1) provides guidance on agency programs that have State-level administrators and coordinating councils, and recommendations on how to coordinate.

Required Coordination with Educational Programs			
Partner	Legal Citation	Description	NCHE Resource
	Section 2301	homelessness, as defined by the education subtitle of 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, as well as evaluation and accountability.	

Definitional Challenges in Interagency Coordination

When working with partners, technical definitions of homelessness will influence your ability to collaborate. These definitions describe an individual’s eligibility for services under the law as well as the governmental process for the provision of those services. Other

definitions of homelessness in government and common use differ from the McKinney-Vento Act’s definition. Recognizing other agencies’ definitions is critical; in some cases, it may affect the identification of homeless children and youth, how referrals are made, or limit access to services.

Key Resource:

The NCHE publication’s subsequent webinar on [Understanding and Navigating the Federal Definitions of Homelessness](#) shares how relevant partners can apply knowledge of the federal definitions of homelessness in their daily work.



For example, the U.S. Department of Housing and Urban Development (HUD) organizes individuals experiencing homelessness into four categories. According to these categories, individuals who are “doubled up” would not be eligible for services:

The Department’s non-regulatory guidance reinforces the importance of state coordinators and local liaisons coordinating with federal agencies that use the McKinney-Vento Act’s definition of homeless, such as the

HUD Definitional Categories for Homelessness
Category 1 - Literally Homeless
Category 2 - Imminent Risk of Homelessness
Category 3 - Homeless Under Other Federal Statutes
Category 4 - Fleeing/Attempting to Flee Domestic Violence

U.S. Department of Agriculture and the U.S. Department of Health and Human Services to “determine eligibility consistently across agencies and expedite referrals for services,”³ including access to food and nutrition benefits such as the Supplemental Nutrition Assistance Program (SNAP). For more information on navigating various agency definitions of homelessness and eligibility for services, see the NCHE brief [Housing and Education Collaborations to Serve Homeless Children, Youth, and Families](#).

The guidance also notes that while some programs administered by federal agencies may use different definitions of “homeless,” it is critical to coordinate with these programs to ensure that homeless students can access services beyond education to address their basic needs, such as housing and health.⁴

10.4 Purposeful Collaboration

It can be daunting to think about collaboration with a wide set of stakeholders, especially when navigating different organizational contexts and constraints. Keeping the purpose of these requirements in mind will help you build purposeful collaborations within state and

³ Page 36 of the [Education for Homeless Children and Youths Non-Regulatory Guidance](#) (question L-1) provides guidance on what education, homeless assistance, and social services should be considered as part of the coordination duties of the state and LEA under the McKinney-Vento Act.

⁴ Page 36 of the [Education for Homeless Children and Youths Program Non-Regulatory Guidance](#) (question L-1) provides guidance on what education, homeless assistance, and social services should be considered as part of the coordination duties of the state and LEA under the McKinney-Vento Act.

local government, as well as strong relationships in the communities served. While developing this network and cultivating influence with partners takes great effort, this work will help you prioritize and support students and families experiencing homelessness. Furthermore, your efforts in this fluid and loosely defined component of your duties will help you prevent homelessness in your state, or at least prevent families from remaining longer or transitioning deeper into the homeless assistance system.

CBOs are vital to supporting the non-academic needs of students experiencing homelessness, especially populations with limited resources. Collaborations with CBOs can increase the capacity of school staff and improve student educational outcomes, such as attendance and graduation rates. For more information, see NCHE's brief [*Partnering with School Social Workers to Expand Local Liaison Capacity and Provide Wraparound Services Under the American Rescue Plan Homeless Children and Youth Program: A Brief for Local Liaisons, School Social Workers, and School Administrators.*](#)

The McKinney-Vento Act's required coordination across agencies and systems is designed to:

- ensure children and youth experiencing homelessness are promptly identified,
- ensure all children and youth experiencing homelessness have access to, and are in reasonable proximity to, available education and related support services, and
- raise awareness for school personnel and service providers about the effects of short-term stays in a shelter and other challenges associated with homelessness.

When performed properly, your efforts to coordinate across agencies, various stakeholders within your state education system, and CBOs could impact students experiencing homelessness. As you engage in this work, your efforts will drive the following outcomes:

Action	Outcome
Increasing awareness of the needs of children and youth experiencing homelessness through working with other agencies...	enables programs and agencies to expand or customize their services, as well as builds strong cross-agency advocacy and policy initiatives.
Coordinating services across programs...	uses resources efficiently.
Aligning policies and practices...	removes barriers to services across programs.

 **Additional Resources**

- NCHE 10 in 10 Training Series: [Module #8: State-Level Coordination](#)
- NCHE Webinar: [Title I, Part A Reservation of Funds for Students Experiencing Homelessness](#)
- NCHE Brief: [Supporting Students Experiencing Homelessness Who Have Disabilities: Federal Provisions to Increase Access and Success](#)
- U.S. Department of Education: [Questions and Answers on Special Education and Homelessness](#)

Chapter 11: Managing Disputes

11.1 Executive Summary

As a state coordinator, you are responsible for ensuring LEAs have adequate training and support in implementing the laws and policies related to school selection and dispute resolution. You are instrumental in ensuring local liaisons implement the dispute resolution process accurately and expeditiously when a complaint arises regarding eligibility, school selection, or enrollment. This chapter provides clarity and guidance on your role in dispute resolution processes.

IN THIS CHAPTER, WE WILL OUTLINE:

- McKinney-Vento Act provisions related to carrying out the dispute resolution process,
- components of the written notice,
- the state coordinator's role in the dispute process, and
- the process for reviewing disputes for compliance and technical assistance needs.

11.2 McKinney-Vento Act Requirements

The McKinney-Vento Act requires SEAs to develop a dispute resolution policy as part of the State Plan, which must include “[a] description of procedures for the prompt resolution of disputes regarding the educational placement of homeless children and youths” (McKinney-Vento Act section 722(g)(1)(C)). In addition, the law requires local liaisons to ensure disputes are mediated in accordance with the state’s McKinney-Vento dispute procedures (McKinney-Vento Act section 722(g)(6)(A)(vii)). State coordinators must support local liaisons in this process.

11.3 Basic Procedures

It is necessary to understand the basic procedures an LEA must follow in dispute resolutions so that you, as a state coordinator, can support them in managing the process with fidelity. Following the laws above, all LEAs must follow the McKinney-Vento Act’s dispute resolution

procedures. These procedures apply to every LEA in every state, regardless of whether the LEA receives EHCY program funds. When a McKinney-Vento Act dispute occurs:

- the child or youth must be admitted to the school in which enrollment is sought, pending the final resolution of the dispute;
- the child or youth must be provided with all services guaranteed in the law, including transportation services;
- the parent, guardian, or unaccompanied youth must be provided with written notice of the school's, LEA's, or SEA's decision, which must include the reasons for its decision and the right to appeal; and
- the parent, guardian, or unaccompanied youth must be referred to the local liaison to carry out the dispute process as expeditiously as possible (McKinney-Vento Act section 722(g)(3)(E)(iii)).

Furthermore, LEAs must adopt or adapt the SEA dispute resolution procedures described by the SEA in their approved state plans and provide timelines for the prompt resolution of these disputes.

11.4 Written Notice

The first part—and a fundamental piece—of the dispute resolution process is providing a written notice, which initiates the dispute resolution. One of the first questions a state coordinator should ask when a complaint arises over eligibility, school selection, or enrollment in a school is whether the LEA has provided written notice to the parent, guardian, or unaccompanied youth.

A written notice should be **complete, as brief as possible, simply stated**, and provided in a **language the parent, guardian, or unaccompanied youth can understand**. The 2016 non-regulatory guidance published by the U.S. Department of Education suggests that the LEA's written notice regarding the reason for its decision should include:

- a description of the action proposed or refused by the school;
- an explanation of why the action is proposed or refused;
- a description of any other options the school considered;

- the reasons why any other options were rejected;
- a description of any other factors relevant to the school’s decision and information related to the eligibility or best interest determination, including the facts, witnesses, and evidence relied upon and their sources;
- appropriate timelines to ensure any relevant deadlines are not missed, and
- contact information for the local liaison and state coordinator, along with a brief description of their roles.⁵

11.5 State Coordinator Role

Your role as a state coordinator involves training LEAs on the dispute resolution policy and process, in addition to ensuring that steps of the dispute resolution process, such as the written notice above, are carried out with fidelity.

As a new state coordinator, review your state’s McKinney-Vento Act dispute resolution policy, as well as the types of disputes that have occurred in LEAs and how they have been resolved. It is also important to review pre-dispute inquiries, which should be recorded, and indicate challenges or questions from local liaisons seeking deeper guidance for navigating a situation.

Most state McKinney-Vento Act dispute resolution policies specify when and how the state coordinator should be involved in a dispute. Some state dispute policies require a significant portion of the dispute process to take place at the local level, while other state policies require the state coordinator’s involvement from the outset of a dispute. In any case, state coordinators are instrumental in ensuring local liaisons are familiar with the dispute resolution policy. They can carry out the process expeditiously or according to any timeline specified in the state policy.

When local liaisons and school staff have this familiarity and a clear understanding of the law, many disputes concerning eligibility, school selection, or school enrollment can be avoided.

⁵ Page 32 of the [Education for Homeless Children and Youths Program Non-Regulatory Guidance](#) (question K-3) provides guidance on what elements should be included in the written explanation of an LEA’s decisions regarding eligibility, enrollment, or school selection.

For example, a dispute may occur over a school or school district refusing to enroll a student because a staff member does not understand the definition of homelessness or eligibility for services, such as transportation. While the feasibility of providing transportation to the school of origin is not a factor in the school selection decision, if the LEA does not provide adequate transportation, it could be disputed as a barrier to enrollment since the student risks being late for school or missing classes regularly.

To avoid confusion and increase understanding of student eligibility and mandated services, state coordinators may provide ongoing training opportunities on McKinney-Vento Act compliance to local liaisons. This support allows local liaisons to train other school district staff. The table below outlines where state coordinators can guide and support local liaisons.

Actions to Provide Guidance and Support to Local Liaisons	
Focus Area	Recommended Actions
Policy	<ul style="list-style-type: none"> • Provide a clear timeline. Ensure that the dispute resolution process includes a clear timeline within which all components of the dispute must occur, from the provision of written notice to a parent, guardian, or unaccompanied youth when a conflict arises over eligibility, school selection, and enrollment in a school to the final resolution of the dispute. • Provide indicators or a checklist. Include indicators for LEA monitoring that pertain to implementing the McKinney-Vento Act dispute process, including providing written notice to parents, guardians, or unaccompanied youth. • Ensure availability and easy access. Make the state’s McKinney-Vento Act dispute resolution process available to all LEAs. Most SEAs post the McKinney-Vento Act dispute resolution process, along with templates for written notice, on the SEA’s EHCY program website.

Actions to Provide Guidance and Support to Local Liaisons

Focus Area	Recommended Actions
Training and Support	<ul style="list-style-type: none">• Provide trainings on the full dispute resolution process. Train local liaisons on all provisions in the McKinney-Vento Act related to eligibility, school selection, and enrollment in a school.• Support a train-the-trainer model. Provide training supports for local liaisons to disseminate information to other LEA administrators and school staff to ensure disputes with parents, guardians, or unaccompanied youth are not caused by the LEA's or the school's lack of understanding of the law.• Conduct regular and annual reviews. Once resolved, review all McKinney-Vento Act disputes to ensure compliance with the state McKinney-Vento Act dispute resolution process. An annual review can also provide valuable information about which local liaisons and LEAs require extra compliance training.
Continuous Improvement	<ul style="list-style-type: none">• Respond to and track inquiries. When liaisons reach out with inquiries, it is important to provide adequate support and document the interaction. These inquiries provide an opportunity to intervene before a situation requires formal dispute resolution.• Continually revise processes. Use the review process to identify ways to improve the process and revise it as necessary.

Additional Resources

- NCHE Brief, Sample Forms, Materials, and Policies: [Dispute Resolution webpage](#)
- U.S. Department of Education: [EHCY Non-Regulatory Guidance, Section K](#)
- NCHE [Homeless Liaison Toolkit](#):
 - Appendix 8.A: [Written Notification of Decision](#)
 - Appendix 8.B: [Dispute Review Guide](#)

Chapter 12: Assessing Needs for Program Improvement

12.1 Executive Summary

This chapter is focused on your role as a state coordinator to ensure the effective implementation and sustained performance of homeless education programs at the local level. Your state context is ever-evolving—as are the communities you serve. Ongoing program improvement is essential to ensure that EHCY program efforts, funding, and other resources are appropriately directed within the state. This chapter will support you in this challenging work by introducing tools and strategies for assessing needs in the state EHCY program. Your needs assessment is a foundation for creating an annual work plan that leverages data to drive effective outcomes.

IN THIS CHAPTER, WE WILL OUTLINE:

- the importance of data review for ongoing program planning and improvement,
- how to assess program needs,
- how your review of the ESSA state plan and federal monitoring can support your EHCY program’s compliance with the law,
- key data sources you should review, and
- the role data plays in discovering the root causes of challenges.

12.2 Program Planning to Optimize Your Work

As a state coordinator, you are required to perform a range of functions as outlined in various chapters of this Handbook. This responsibility can be daunting for new and veteran state coordinators alike, and you may wonder where to start or what activities to prioritize.

Identifying the activities that effectively drive positive outcomes year after year for students experiencing homelessness is challenging. In your role, you will also need to decide whether to redirect resources within the state to address the areas of greatest need or highest potential for impact. Data-informed program planning is an essential step that allows you to assess EHCY program effectiveness and identify areas for improvement. A clearly articulated

plan may also provide support when disputes or problems arise that can take time away from program goals and priorities.

The U.S. Department of Education identified developing annual state EHCY work plans as an essential tool for improving outcomes for students experiencing homelessness. Program planning includes the following benefits:

- Students and their families receive services targeted to their needs.
- Program planning increases efficiency and saves time.
- Long-term planning will help avoid crises.
- Prioritizing activities will result in the better use of funds, including training, technical assistance, and conferencing planning.
- Program leaders and stakeholders see progress and improvement toward goals (which can result in more resources or funding for your program).

As you develop your annual work plan, we recommend you employ two key strategies: (1) conduct a needs assessment to understand EHCY program challenges; and (2) review and analyze data and informal feedback. The following two sections will further explore these topics.

12.3 Needs Assessment

A needs assessment is a vital tool to engage educators in identifying and understanding program components that are working well and those that need improvement. The information you collect through a needs assessment is invaluable to your work as a state coordinator, allowing you and your staff to directly target and effectively support students experiencing homelessness through your day-to-day work.

Conducting a SEA needs assessment will ensure the EHCY program is identifying and meeting the needs of children and youth experiencing homelessness through activities conducted at the state level, as well as activities to oversee and support LEAs in serving children and youth experiencing homelessness. To support your program's needs assessment on key provisions of the McKinney-Vento Act, including what the law requires,

suggestions for data to review, guiding questions, and tips on the prioritization of needs, see Parts IA and IIA of NCHE's [Education for Homeless Children and Youth Program: Guide to Developing an Annual Plan for State-Level Activities](#).

12.4 Reviewing the State EHCY Program for Compliance

To ensure your program complies with federal legislation, you should review the following key resources:

- **Your state ESSA plan.** The Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act, requires every state to develop a consolidated state plan, which includes individual program state plans. Each state plan includes a section specific to the EHCY program. You should review this annually to determine the extent to which the SEA is following what was proposed and approved by the Department to meet the requirements of the McKinney-Vento Act. If the current implementation of the EHCY program necessitates a change to the activities listed in the State Plan, please notify EHCY program staff at the Department. You can [view your state ESSA plan online](#).
- **Federal monitoring reports.** In 2017, the Department's federal EHCY program office revised its monitoring plan to align with new requirements and priorities under the amendments to the EHCY program under the Every Student Succeeds Act of 2015, which took effect on October 1, 2016. If your state has been monitored under ESSA, you should proactively review the reported findings to determine progress in addressing areas identified for improvement. You may also want to review recent reports from other states to identify trends in corrective actions and recommendations. You can [view federal monitoring reports online](#).

12.5 Reviewing Data

State coordinators should review data to determine areas for program improvement as well as to make informed decisions and prioritizations based on performance. The table below suggests some key data sources to support you in this work.

Data Sources and Resources for Assessing Needs

EDPass Data	Local-level data that LEAs submit are available in NCHE data workbooks, which you can use to learn more about your program’s impact on students experiencing homelessness. These Excel workbooks include information on demographics and academic performance. The data is also presented visually in maps, and a guide is provided to help state coordinators better understand and use the information. To access your state’s workbook, submit a request to NCHE with your name, title, and contact information.
Data Intervention Guide	This NCHE guide offers strong examples of the type of data analysis the Department would like to see state coordinators conduct. Review this publication to learn more about how you can prioritize and tailor technical assistance to the areas of greatest need and the highest potential impact.
LEA support requests, complaints, or disputes	Multiple data sources reveal where LEAs would benefit from more oversight, training, and technical assistance. These sources include calls, complaints, dispute records, LEA monitoring reports, and informal feedback from your local liaisons. Treating these touchpoints as data points can give you critical insight into how you focus your time, particularly if you notice multiple LEA partners requesting similar support or repeat requests.
Community feedback	Other sources of stakeholder feedback can help you determine how the SEA is meeting the needs of its target communities—particularly students and families experiencing homelessness. This feedback can stem from advisory boards, survey engagement, or other community conversations. You can also gather feedback from SEA and LEA staff to better understand the challenges that educators face in their communities.

It is important to note that while published data workbooks offer useful insights, these data represent realities from previous school years. To access current insights, it is essential to form strong relationships with the data coordinator and other colleagues in your SEA. With

their support, you can gain more accurate and timely insights from enrollment data at three points during the school year: fall, spring, and the end of the school year.

12.6 Root Causes

Data points provide the “what”—they describe the issue. It is important to ask “why?” to understand the root causes of a problem. Collecting important insights about your program supports your needs assessment and gauges your state EHCY program’s compliance with federal mandates. However, if you stop there, you may not uncover the underlying issues or obstacles that hinder program success. As you review and analyze state performance data, stakeholder feedback, and other sources to inform your program planning, you should consider the root causes of the challenges your EHCY program and partners face.

Below are some common root causes you may encounter in your work. A systematic review and analysis of data to probe the root causes will lead to annual work plans that target resources and efforts where they are most needed.

Root Cause	Description	Solutions to Explore
Lack of state coordinator capacity	State resourcing and context vary. Capacity can refer to a lack of the state coordinator’s staffing time, funding, or inadequate training.	Explore additional capacity through SEA funding or training.
Lack of local liaison capacity	Local resourcing and context vary. Capacity can refer to a lack of LEA resources that limit liaisons’ time or inadequate preparation, guidance, and training.	Explore additional capacity through LEA subgrants, technical assistance, or training.
Lack of understanding of the legislation	Partners within the SEA or LEAs may misunderstand the legal requirements and role expectations mandated under the McKinney-Vento Act or another federal law.	Explore additional training on McKinney-Vento and legislative requirements.

Root Cause	Description	Solutions to Explore
<p>Lack of state-level coordination (within the SEA or across agencies)</p>	<p>Miscoordination at the state level can occur within the SEA, across other education programs, or across other state agencies. This miscoordination may indicate the need for broader awareness of the McKinney-Vento Act and the needs of children and youth experiencing homelessness in other systems, such as housing and social services.</p>	<p>Explore a broader awareness campaign within the SEA and across agencies. Create memoranda of agreement for better coordination of services, conduct joint trainings, and serve on advisory boards of other agencies.</p>
<p>Policy barriers</p>	<p>Policy barriers may be encountered at the SEA, LEA, or within the state code. Typical areas of policy barriers include records required for enrollment (immunization, birth certificates), medical consent for unaccompanied youth, access to services for underaged youth, participation in sports residency requirements, or credit accrual.</p>	<p>Explore policy review and revision to remove barriers.</p>
<p>Student factors</p>	<p>Students experiencing homelessness face unique challenges and require individualized support. Students may be dealing with trauma or complex relationships that create barriers to receiving support and services.</p>	<p>Explore deeper engagement with communities. Consider training for SEA and LEA partners on appropriate trauma-informed responses.</p>



Additional Resources

- NCHE [*Data Intervention Guide: Digging Deeper with Data*](#)
- NCHE [*National Summary Reports*](#)
- NCHE [*Education for Homeless Children and Youth Program: Guide to Developing an Annual Plan for State-Level Activities*](#)
- NCHE [*Data Collection Process and Students Experiencing Homelessness*](#)
- U.S. Department of Education Resource: [*Needs Assessment Guidebook*](#)

Chapter 13: Planning the Work and Working Your Plan

13.1 Executive Summary

As we near the end of this Handbook, you have received an introduction to the essential responsibilities and functions of your role. This work, however, is ongoing. In this final chapter, we present tools, tips, and strategies to consider as you iterate year over year to make your state's EHCY program more effective in driving positive outcomes for students experiencing homelessness.

IN THIS CHAPTER, WE WILL OUTLINE:

- strategies for creating your annual work plan,
- routines for maintaining a calendar of key activities,
- practical tips for organizing the work, and
- key resources to support learning in your role.

13.2 Annual Work Plan

With many requirements and demands on your time, it is easy for state coordinators to get lost in day-to-day activities and crisis management. However, developing an annual work plan ensures a set of intentional actions to address identified needs and improve outcomes for students experiencing homelessness.

As mentioned in Chapter 12, the U.S. Department of Education found that the development of a strong annual work plan is a leading indicator of improved outcomes for the EHCY program and students experiencing homelessness. The next step in building on the data analysis and needs assessment activities outlined in the previous chapter is to develop [clear, measurable goals](#) for program improvement. By identifying goals to improve at least one chosen performance measure, you are taking concrete steps to improve the EHCY program's effectiveness.

13.3 Developing a Calendar

An annual action plan bridges the ESSA State Plan and your office's day-to-day activities. Developing a calendar will help track key activities that lead to accomplishing annual program goals. The calendar will also ensure you remember important dates and deadlines.

As you develop a calendar aligned with your annual plan, here are some activities you might include:

- conferences providing opportunities for your professional growth;
- state coordinator informational webinars, an annual state coordinator meeting, and other role-specific training opportunities, including those that the Department and NCHE provide;
- LEA trainings;
- LEA monitoring timelines and dates;
- key dates in the subgrant cycle; and
- key dates in the annual federal data collection.

13.4 Practical Tips for Organizing the Work

This position is complex, and most state coordinators balance other responsibilities while administering their EHCY programs. To ensure this work is manageable and effective, consider the following tips:

- Ask for support! You have a support network available to you. Share best practices and materials with other state coordinators, [contact NCHE via the helpline](#), or connect with other professional organizations working to support students experiencing homelessness. Colleagues at the Department are also available as part of your support network.
- Seek ways to integrate homeless education into higher-profile issues within the state.
- Form regional networking groups where lead local liaisons can provide support and technical assistance to less-experienced liaisons in the region. This approach has proven effective in several states that cover large geographical areas or have many LEAs. Talk with fellow state coordinators to learn about effective networks in their states, or contact NCHE specialists to learn more.

- Designate knowledgeable and skilled liaisons to represent the state coordinator at interagency meetings and to present at conferences. Ensure you have a process to oversee activities and receive updates from your designees.

13.5 Continuous Learning

To best serve youth and children experiencing homelessness, we encourage state coordinators to adopt a continuous learning mindset. Policy and guidance are always subject to change, and so is the latest thinking from researchers and practitioners working with highly mobile and otherwise vulnerable student populations.

Keeping up with research in the field of homeless education is critical to ensuring effective programs and policies in your state's EHCY program. NCHE's [Research Summary: Homelessness and Education Cross-System Collaboration - Applied Research Summary and Tools](#) offers an overview of recent, relevant scholarship.


Staying connected to your peers in the broader community of government administrators, social workers, educators, community-based partners, and others is essential to ensure your state's EHCY program is informed by emerging, evidence-based strategies to support students experiencing homelessness. In addition to resources that NCHE and the Department publish, we encourage you to participate in organizations and conferences that provide thought partnership and broaden your support network.

Consider signing up for newsletters and updates from the following organizations to stay in the loop:

- [National Association for the Education of Homeless Children and Youth \(NAEHCY\)](#)
- [National Network for Youth \(NN4Y\)](#)
- [SchoolHouse Connection](#)

13.6 Stay Connected

As you engage in this work, you are not alone! Stay connected with NCHE and the Department for essential resources, including non-regulatory guidance, research briefs, best practices, and thought partnership.

National Center for Homeless Education	U.S. Department of Education
	
<p>NCHE provides a website with issue briefs, presentations, webinars, training and TA, as well as state coordinator meetings and work groups.</p>	<p>The Department plans the annual state coordinators’ meeting and quarterly webinars to support your work.</p>
<p>Website: https://nche.ed.gov Email: NCHE.Helpline@safalpartners.com Helpline: 305-306-8495</p>	<p>Website: Education for Homeless Children and Youths - Office of Elementary and Secondary Education Email: HomelessEd@ed.gov</p>

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APPENDIX A

Glossary of Common Acronyms

ACGR	Adjusted Cohort Graduation Rate
CBO	Community-Based Organization
CSPR	Consolidated State Performance Report
CTE	Career Technical Education
CYEH	Children and Youth Experiencing Homelessness
EHCY	Education for Homeless Children and Youth
EL	English Learner
ESSA	Every Student Succeeds Act
GPRA	Government Performance and Results Act
HCY	Homeless Children and Youth
HUD	U.S. Department of Housing and Urban Development
IDEA	Individuals with Disabilities Education Act
LEA	Local Education Agency
NCHE	National Center for Homeless Education
OESE	Office of Elementary and Secondary Education
SEA	State Education Agency
TA	Technical Assistance
The Department	U.S. Department of Education
UYEH	Unaccompanied Youth Experiencing Homelessness