

A Closer Look at File Specifications: FS 195

The National Center for Homeless Education (NCHE) developed a series of briefs focused on ensuring data submitted to the U.S. Department of Education (ED) meet quality standards and conform to program requirements. The series supplements information provided in ED's [file specifications](#), which are the primary guidance documents on ED Facts data collections. This brief provides information about the data collection and submission process for adjusted cohort graduation rate data submitted under File Specification (FS) 195: Chronic Absenteeism.

Data Collected by FS 195

FS 195 includes Data Groups (DGs) 814 and 887. This file specification provides information on the number of students who were chronically absent.

- DG 814 collects information on the number of students who were chronically absent at the school level. This data group includes students who experienced homelessness, who were economically disadvantaged,¹ who had a disability, who were English learners, as well as students by race/ethnicity and sex (female or male).

DG 887 collects information on the number of students who were chronically absent at the local educational agency (LEA) and state educational agency (SEA) levels. This data group only pertains to students who experienced homelessness and students who were economically disadvantaged.

¹The definition of economically disadvantaged is determined by each SEA, as noted in Elementary and Secondary Education Act Consolidated State Plans. To learn more, visit <https://www.ed.gov/about/ed-offices/oese/key-documents-school-support-and-accountability>.

Important Dates

FS 195 is usually due by January 2027 for School Year (SY) 2025-26. The file is usually enabled in EDPass in November 2026 and may be submitted at any time between then and January 2027. These data will be submitted via ED's new data submission system, [EDPass](#).

Data Quality Checks

As data are submitted to EDPass, the system automatically completes checks to ensure the data are accurate and complete. The system's data checks are based on the [Business Rules Single Inventory \(BRSI\)](#) published by ED. Only two business rules pertain to the homeless student subgroup in FS 195: CHRN 007 and CHRN 008. Data that violates these two rules will be immediately flagged. To complete the data submission, state coordinators for homeless education must work with their ED*Facts* coordinator to either draft and submit a note explaining the error or revise and resubmit the data. Data cannot be submitted in EDPass until all flags are addressed. Rule failures can be resolved by either uploading corrected data or by submitting a note that explains why the business rule failed. However, data errors can only be resolved by uploading a corrected data file.

The questions below are based on rules pertaining to FS 195 contained in the BRSI. To ensure that data are ready to be loaded into EDPass, state coordinators, ED*Facts* coordinators, and others reviewing data included in FS 195 can use the questions to validate their data. If any question results in a response of "no," state coordinators should investigate the reason and work with liaisons or the data staff submitting information to make corrections before submitting data in EDPass. If, upon further investigation, the data are determined to be correct even though they do not align with the BRSI, state coordinators should work with ED*Facts* coordinators to submit explanatory comments with the data.

To ensure that data are accurate and complete, some of the questions below expand on the rules included in the BRSI. Questions that align with the BRSI are indicated by listing the BRSI rule after the question.

Completeness

- Did all LEAs with enrolled homeless students report the number of homeless students who were chronically absent at the school level? (BRSI Rules ALL-0001, ALL-0002, ALL-0008, CHRN-0003, CHRN-0004, FERR-0022)
- Did all LEAs report the number of homeless students who were chronically absent at the LEA level? (BRSI Rules ALL-0001, ALL-0002, ALL-0008, CHRN-0001, CHRN-0002, FERR-0022)
- Did the SEA report the number of homeless students who were chronically absent at the SEA level? (BRSI Rules ALL-0001, ALL-0008, CHRN-0001, CHRN-0002, FERR-0022)
- Is an education unit total (EUT) included for each school? (BRSI Rule ALL-0006)

Current Year Accuracy

- Is the count of students who experienced homelessness and were chronically absent equal to or less than the education unit total (EUT) for each school? (BRSI Rule ALL-0003)
- If schools within an LEA or the LEA report chronically absent homeless students, does the LEA also report homeless students enrolled in the LEA under FS 118? (BRSI Rules CHRN-0007, CHRN-0008)
- Are the counts of students who were homeless and chronically absent unduplicated at the LEA and SEA levels, resulting in an LEA count of chronically absent students who experienced homelessness that is equal to or less than the count of chronically absent students who experienced homelessness at the school level, and a count at the SEA level that is equal to or less than the LEA-level count?

Accuracy Across Years

- Is the number of children and youth experiencing homelessness and identified as chronically absent in the previous school year similar to the number of children and youth experiencing homelessness and identified as chronically absent in the current school year?
- Did the same number of schools report chronically absent students this school year as last school year?

It is important to recognize that, while EDPass may not automatically check the data in FS 195 using business rules in the BRSI for comparisons across multiple years, ED does review this data longitudinally and may contact SEAs about their submissions on this point.

General Data Quality Notes

Students who are enrolled in a school for 10 or more days and are absent from school for 10% or more of those days are considered chronically absent and must be included in this data set. Students who attend a state institution must be enrolled for 60 or more days and be absent for 10% or more of those days to be considered chronically absent. Because a student's status as chronically absent is based on a percentage of the days they enrolled in a particular school, the number of days a student must miss to be considered chronically absent will vary based on the time the student was enrolled. Finally, if a school reports a student as a chronically absent homeless student, the LEA should also include the student in the enrolled homeless student counts in FS 118.

If a student attends more than one school over the course of the school year and is chronically absent while attending more than one of these schools, include the student in the count of chronically absent students for each school at which they enrolled and met the criteria. When determining the count of students who experienced homelessness and chronic absenteeism at the LEA level, do not recalculate the percentage of days the student missed based on the total number of days enrolled in the LEA. Rather, include students who experienced homelessness in the LEA count of students who were chronically absent if they experienced homelessness and chronic absenteeism simultaneously while enrolled in any school within the LEA. Similarly, students should be included in the SEA-level count if they were chronically absent while homeless and enrolled in a school within the state. Please note that while students retain eligibility for services under the McKinney-Vento Act for the duration of their homelessness or until the end of the school year in which they obtain housing, recently rehoused students may only be included in counts of chronically absent students who experienced homelessness if they were chronically absent during the time they were without housing. When calculating counts of students who were chronically absent and homeless, only include those students who experienced homelessness while chronically absent.

Some LEAs operate under policies that unenroll any student who has been absent for 10 days. Such policies violate the requirements for reporting students who are chronically absent and must be revised to align with FS 195's requirement that students be considered chronically absent based on the percentage of school days they missed. For example, a student who was enrolled in the same school for 120 days will not be considered chronically absent until the student has missed at least 12 days of school. The student may be inappropriately excluded from the chronic absenteeism count if the school automatically removes the student from enrollment at day 10. Additionally, policies that automatically unenroll a student who has been absent for 10 days violate requirements within the McKinney-Vento Act to develop, review, and revise "policies to remove barriers to the identification of homeless children and youths, and the enrollment and retention of homeless children and youths in schools...including barriers to enrollment and retention due to outstanding fees or fines, or absences."

The following scenarios provide examples that illustrate which students should be included in chronic absenteeism counts under FS 195, along with an example of how the data relate to the homeless enrolled counts contained in FS 118:

- A student experienced homelessness while enrolled in three different schools within a single LEA over the course of the school year. The student was enrolled in the first school for 86 days, the second school for 85 days, and the third school for 8 days. While enrolled in the schools, the student missed 10, 6, and 1 days, respectively. While the student missed more than 10% of the school days for which they were enrolled in the first and third schools, the student attended the third school for less than 10 days. As a result, the student should only be included in DG 814 as chronically absent for the first school in which the student was enrolled. When submitting DG 887, the student should be included once for the LEA because the student was chronically absent while enrolled in one of the schools within the LEA and once for the SEA.
- A student who experienced homelessness was enrolled in a traditional school (i.e., an operational regular school) for 110 days but then transferred to a school operated by the state's Department of Health and Human Services (i.e., a state-operated agency). The student was enrolled in the state-operated school for 62 days. The student was absent from the traditional school for 9 days and missed 7 days while enrolled in the state-operated school. Thus, the student did not meet the threshold (10%) for a chronically absent student while attending the traditional school but should be included as chronically absent for the state-operated school in DG 814. Because the student was housed while attending the state-operated school, the student will not be included in the count of students who were chronically absent and experienced homelessness.
- A student was enrolled in a school for 120 days. While enrolled in that school, the student became homeless. The student then obtained housing in a new LEA, transferred to the local attendance-area school where the new housing was located, and remained enrolled in that school for the remaining 60 days of the school year. While attending the original school, the student missed 15 days of school, but only missed 1 day of classes at the new school. The student should be reported as a chronically absent homeless student in the original school for DG 814 and LEA for DG 887. The LEA in which the school of origin is located will also include the student as a homeless enrolled student in FS 118. The student will not be included as a chronically absent student for the second school in DG 814. The student will not be included as chronically absent for the second LEA in DG 887 and will not be reported for the second LEA as homeless in FS 118. The SEA will include the student as a student who experienced homelessness once for DG 887.

Students are considered absent when they were not in attendance on school grounds and did not participate in instruction or instruction-related activities at an off-grounds location for at least half of the school day. If a student attends school on a part-time basis, the amount of time in a school day

that a student can miss is based on the student's schedule. For example, a student who is scheduled to attend school for 4 hours a day but misses more than 2 hours of class is considered absent.

Providing Notes About Quality

SEAs are expected to submit data comments for each issue flagged by business rules in the EDPass system. Notes that SEAs submit will be included with data when they are published by ED or NCHE. The comments should be concise, explain a problem or large change within the data, explain why data have not been submitted, or explain steps the SEA is taking to correct the data. The three most common mistakes SEAs make when including comments with their data are

1. using the same comment that was used for the previous collection window, even though it is out of date and no longer relevant;
2. including comments for a data point that do not apply to that data; and
3. including comments that are unclear or confusing.

The following are examples of comments that help clarify data included under FS 195 and will likely reduce the number of corrections the SEA will be asked to make:

- Our state emphasized reducing absenteeism when scoring applicants for McKinney-Vento subgrants. This resulted in an increase in the number of attendance-related interventions and significantly reduced the number of days our homeless students missed school.
- Our student information system does not allow for an unduplicated count of students.
- Our student information system allows categories for sex that are not female or male.

The following are examples of comments that are vague, do not indicate what steps were taken to address the problem identified during EDPass data submission, or indicate that the SEA violated a rule included in the file specifications. These comments are therefore likely to result in the application of a data quality note before ED releases data:

- Data are correct (in response to an error message).
- This is the same methodology we used last year (in response to an error message).
- Chronic absenteeism data is collected at the school level, but enrollment is collected at the LEA level.

Students are eligible for McKinney-Vento services until the end of the school year.

Below is a table of all applicable business rules for FS 195, including the rule ID, the rule objective, and the rule definition. The table is intended to illustrate the extent of FS 195 to help state coordinators, ED Facts coordinators, and others review the data included in FS 195. Rules CHRN-0007 and 0008 are particularly important, as they focus on data related to children and youth experiencing homelessness.

EDPass Rule ID	Rule Objective	Definition
All-0003	Accuracy	The sum of reported counts for subcategory sets is expected to equal the education unit total (EUT).
All-0006	Completeness	An education unit total (EUT) is expected to be reported for each required unit.
All-0008	Completeness	All permitted value combinations where zero reporting is required are expected to be included in the file.
CHRN-0001	Completeness	The SEA/LEA data group in the Chronic Absenteeism file must contain meaningful data and is expected to include counts greater than zero.
CHRN-0002	Completeness	The SEA/LEA data group in the Chronic Absenteeism file must contain meaningful data and is expected to include values other than Missing (-1).
CHRN-0003	Completeness	The school data group in the Chronic Absenteeism file must contain meaningful data and is expected to include counts greater than zero.
CHRN-0004	Completeness	The school data group in the Chronic Absenteeism file must contain meaningful data and is expected to include values other than Missing (-1).
CHRN-0007	Expected relationship	When the count of homeless enrolled students in the SEA/LEA data group in the Chronic Absenteeism file for an LEA is greater than zero, a count of greater than zero is expected for that LEA in the Homeless Students Enrolled file.
CHRN-0008	Expected relationship	When the sum of homeless enrolled students in the school data group in the Chronic Absenteeism file aggregated to the LEA level is greater than zero, a count of greater than zero is expected for that LEA in the Homeless Students Enrolled file.

EDPass Rule ID	Rule Objective	Definition
FERR-0022	Format and validation	All mandatory fields in the file are expected to contain a reported value.

***Note:** More details about each rule may be found by accessing [EDFacts Business Rules | U.S. Department of Education](#).

Public Availability of Data

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

- **ED Data Express** is a website hosted by ED to improve public access to data at the district and state levels. Data for students who experienced homelessness and related notes on data quality can be accessed by visiting <https://eddataexpress.ed.gov/> and selecting the green *Data Download* button. After clicking the green *Reset Filters* button, data may be filtered by choosing options for the state, level (LEA or SEA), school year, file specification, and homeless subgroup to create a downloadable file.



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