

J. Education for Homeless Children and Youth program, McKinney-Vento Homeless Assistance Act, Title VII, Subtitle B

Homelessness is present in schools throughout Missouri. Children and youth experience the uncertainty of housing and other basic needs. Through technical assistance and direct consultation, MO-DESE supports local districts and charter LEAs to meet the needs of these students. To the extent that federal allocations allow, MO-DESE provides grants to schools in the greatest need.

Student Identification (722(g)(1)(B) of the McKinney-Vento Act): Describe the procedures the SEA will use to identify homeless children and youth in the State and to assess their needs.

MO-DESE collects data at the individual level through the Missouri Student Information System (MOSIS) and aggregates the counts for data reporting and collections at the state and federal level. The Student Core File includes a single record for each student which includes an indicator as to the student's homeless status. This information is collected as necessary in the October, December, February, April and June data submissions.

Each LEA assesses the needs of the students who have been identified as homeless. The LEA may contact the state homeless coordinator if they are in need of technical assistance in assessing the needs of the identified student.

1. Dispute Resolution (722(g)(1)(C) of the McKinney-Vento Act): Describe procedures for the prompt resolution of disputes regarding the educational placement of homeless children and youth.

The LEA homeless liaison will handle disputes concerning eligibility, school selection or the enrollment in school for homeless students or youth. During the dispute, homeless children or youth must be enrolled and fully participating in school activities as well as receive transportation, if requested, to the school in which the parent/guardian or unaccompanied homeless youth seeks enrollment during the dispute. LEA liaisons will carry out the dispute resolution procedures as quickly as possible after receiving notice of a dispute.

MO-DESE recommends that LEAs use the following complaint resolution process when a dispute arises regarding the education of a homeless child or youth:

1. LEA Level -- Every effort must be made to resolve the complaint or dispute at the LEA level before it is brought to MO-DESE. It is the responsibility of the LEA to inform the complainant of the LEA's Complaint Resolution Procedure when a question arises concerning the education of a homeless child or youth.
 - A. Notify the LEA's homeless liaison. The homeless liaison serves as the intermediary between the homeless child and the school the child attends.
 - a. The parent/guardian or homeless youth shall request a copy of or access to the LEA's policies addressing the education of homeless children and youths and review them.
 - b. The parent/guardian must make an appointment with the homeless liaison to discuss the complaint.

- c. If the dispute is not resolved after the initial discussion with the LEA's homeless liaison, the complainant can file a complaint in writing to the LEA's superintendent/administrator for further review.
 - d. The complaint should include a request that a written proposed resolution of the dispute or a plan of action be provided within five days of the date the complaint was received by the LEA's homeless liaison*. A review of the proposal or plan of action with the homeless liaison should follow.
 - B. If the dispute is not resolved at the homeless liaison level, the complaint may be forwarded to the superintendent of the LEA for review followed by a meeting with the superintendent/administrator to discuss the dispute. The complainant should request from the superintendent a written resolution within five days of the date of the discussion*.
 - C. If the dispute is not resolved at the superintendent/administrator level, the complainant may take the matter before the LEA's board of education for resolution.
 - 2. State Level -- If the dispute is not resolved in a satisfactory manner at the LEA level, the complaint may be brought to MO-DESE. Complaints made under this process must be made in writing and signed by the complainant. The following steps are to be taken:
 - A. Address the complaint to:
State Homeless Coordinator
Federal Programs
P.O. Box 480
Jefferson City, Missouri 65102-0480
 - B. The complaint must include
 1. a detailed description of the dispute;
 2. the name(s) and age(s) of the children involved;
 3. the name(s) of involved LEA personnel and the LEA(s) they represent; and
 4. a description of attempts that were made to resolve the issue at the LEA level.
 - C. The Director of Federal Programs (Director) will inform the involved LEA(s) of the complaint. The Director or the Director's designee will gather needed information including documentation and statements of the parties and may conduct an independent investigation through an on-site visit if necessary.
 - D. Within 30 days of receipt of the complaint, the Director will inform the parties, in writing, of the decision**.
 - E. If a complainant disagrees with the Director's decision, the complainant may, within 10 business days, appeal the decision to the Deputy Commissioner of Learning Services. This appeal must be in writing and indicate why the complainant disagrees with the decision.

- F. Within 30 days of receiving the appeal, the Deputy Commissioner of Learning Services will render a final administrative decision and notify the complainant and all other interested parties in writing**.
- G. While the dispute is ongoing, the child(ren) in question must be enrolled in school. If the dispute revolves around which school is the school of best interest for the child, the child shall remain in the school they currently attend until the dispute is resolved unless arrangements already implemented allow the child to attend the school of origin.

*The parties may mutually agree to an extension; however, every effort should be made to resolve the complaint in the shortest possible time.

**Although the standard procedure allows 30 days for a response, every effort will be made to resolve the complaint in the shortest possible time.

3. Support for School Personnel (722(g)(1)(D) of the McKinney-Vento Act): Describe programs for school personnel (including the LEA liaisons for homeless children and youth, principals and other school leaders, attendance officers, teachers, enrollment personnel, and specialized instructional support personnel) to heighten the awareness of such school personnel of the specific needs of homeless children and youth, including runaway and homeless children and youth.
- The following efforts to build awareness of school personnel to the specific needs of homeless children and youths are undertaken by the MO-DESE and the state homeless coordinator:
- Posters explaining the educational rights of homeless children and youths are made available on MO-DESE's website. Posters have a space for each homeless liaison to provide his or her contact information.
 - The state homeless coordinator conducts at least two webinars per year and presents at a number of conferences (Governor's Council to End Homelessness, Continuum of Care, Department of Higher Education FAFSA Frenzy, Missouri Association of Student Financial Aid Personnel, Federal Programs Conference, DHSS School Nurses Conference, National Association for the Education of Homeless Children and Youth Conference and the Conference on the Young Years) in order to raise awareness on topics relevant to the Education of Homeless Children and Youth (EHCY) Program.
 - The state coordinator's office maintains a listserv dedicated to LEA homeless liaisons. The listserv is utilized to disseminate pertinent information about the EHCY Program and update liaisons about upcoming meetings, webinars, conferences, and program updates and legislative changes.
 - MO-DESE posts an updated list of LEA homeless liaisons on MO-DESE's website at least twice per year. The updated list is also disseminated through the homeless education list serve. This list is also used to keep liaisons updated about upcoming meetings, webinars, conferences, web site changes and additions and program and legislative updates as needed throughout the school year.
 - MO-DESE maintains a website dedicated to the EHCY Program. It contains information from recently attended trainings and workshops, district

homeless liaison job responsibilities, Missouri best practices for homeless education, forms, federal and state guidance on homeless issues, homeless data, and other guidance pertinent to the EHCY Program.

- MO-DESE maintains an Administrative Manual for the Homeless Children and Youth Grant Program. The manual provides guidance on the following: the EHCY grant program, the identification of homeless children and youths, responsibilities of the homeless liaison, school assignment and placement of homeless children and youth, school records, testing, immunization, comparable services, transportation, grant funding, staff development, data, and uses of local Title I funds. The manual is available on MO-DESE's website.
- MO-DESE is also in the developmental stages of a statewide professional development online tool, similar to the model being used in Michigan, which will be used to provide ongoing professional development training for the state's LEA homeless liaisons. MO-DESE will utilize the data from this system to provide targeted professional development based on LEA needs.

2. Access to Services (722(g)(1)(F) of the McKinney-Vento Act): Describe procedures that ensure that:

- i. Homeless children have access to public preschool programs, administered by the SEA or LEA, as provided to other children in the State;
- ii. Homeless youth and youth separated from public schools are identified and accorded equal access to appropriate secondary education and support services, including by identifying and removing barriers that prevent youth described in this clause from receiving appropriate credit for full or partial coursework satisfactorily completed while attending a prior school, in accordance with State, local, and school policies; and
- iii. Homeless children and youth who meet the relevant eligibility criteria do not face barriers to accessing academic and extracurricular activities, including magnet school, summer school, career and technical education, advanced placement, online learning, and charter school programs, if such programs are available at the State and local levels.

Comprehensive Services:

MO-DESE maintains and updates yearly an Administrative Manual for the EHCY Program. The manual contains information on identification of homeless children and youths, responsibilities of the homeless liaison, school assignment and placement of homeless children and youth, school records, testing, immunization, comparable services, transportation, grant funding, staff development, and use of local Title I funds.

(<https://dese.mo.gov/sites/default/files/qs-hmls-admin-manual-16-17.pdf>)

Students experiencing homelessness in Missouri are not segregated from their housed peers on the basis of their homelessness and are included in the appropriate educational programs, including compensatory educational programs for the disadvantaged, educational programs for the handicapped, programs for students with limited English language proficiency, career education programs, programs for the gifted and talented, preschool programs, and school meal programs.

Each LEA in the state of Missouri must have policies and procedures in place outlining how they identify and assess the educational needs of homeless children and youths including removal of barriers to homeless students' education, which may include immediate enrollment, transportation, immunization, residency, records and guardianship.

MO-DESE personnel, through the Tiered Monitoring System, monitor all LEA policies and procedures pertaining to homeless children and youths, identification of homeless children and youths, and the identification of the LEA's homeless liaison.

The state homeless coordinator continues to collaborate with state social service agencies (through the SEAP and SICC) which includes providers of health, mental health, and child development series; preschool programs; community organizations; and other agencies to improve the provision of comprehensive education and related services to homeless preschool-aged children the their families.

Preschool

MO-DESE has the following procedures in place to ensure that homeless children have access to public preschool programs:

- Missouri State Head Start Collaboration Office has a state-level memorandum of understanding with MO-DESE and the Missouri Departments of Health and Senior Services, Social Services, and Mental Health for the purpose of promoting collaboration and partnership to support children and families served by the parties, especially children and families living in poverty. In addition, the memorandum of understanding serves as a basis for the development of local agreements that are tailored to meet the unique needs of programs, necessary partnerships and the value of each collaborative. The state coordinator and the Assistant Director of Missouri State Head Start Collaboration Office are participating members of the Governor's Task Force on Homelessness.
- The SEA will provide ongoing training to ensure all LEAs are compliant with the school of origin inclusion for preschool students and to ensure that preschoolers experiencing homelessness have equal access to public preschool programs administered by the SEA and LEAs as provided to other children.
- The SEA reviews and monitors preschool policies and practices of LEAs through the Tiered Monitoring System, including the requirement that LEAs ensure that homeless preschool-aged children are identified by school personnel. This includes children with disabilities under Part B of the IDEA or qualified students with disabilities under section 504 of the Rehabilitation Act of 1973.
- LEAs are required to remove barriers to enrollment and retention for homeless children including preschool students. For preschool students, LEAs must provide transportation to and from the child's

school of origin at the request of the parent, or for unaccompanied youth, the request of the liaison if staying in the school of origin is in the child's best interest.

Secondary

While Missouri's state minimum graduation requirements are set by the State Board of Education, LEAs are granted latitude in how those requirements are met. Generally, MO-DESE would find that those requirements are met through successful completion of traditional, Carnegie Unit coursework. However, LEAs may also accept transfer credit, award credit for demonstrated mastery of the content, award credit for work experiences, and base credit determinations on an analysis of previous studies and current levels of achievement. Students' individual situations sometimes require consideration of variances and alternatives.

If a local board chooses to allow these variances and alternatives, it must do so through officially adopted policies and through procedures that will ensure a fair and consistent application of its policies. Local boards of education have authority to establish reasonable, nondiscriminatory policies for determining grade placement of transfer students, recognizing credit from their prior schools, and other non-routine methods of establishing educational attainment. Following are descriptions of areas in which local boards of education may adopt policies that vary from the state standard minimum graduation requirements:

- When students transfer between LEAs with significantly different schedules structures, LEAs (in order to be equitable to students as well as to maintain district graduation requirements) may transcribe credit through translation tables. Instances may include students transferring across four-, eight-, and ten-block schedules.
- Further, credit structures from other states may require multiplication or division of existing credit by comparing state graduation requirements. For example, an algebra class worth 10 credits in one state may translate to a single credit in Missouri. To recognize and accommodate these differences, LEAs are encouraged to establish a clearly written policy detailing how to manage such transfers when they occur.

Such policies should be fair and equitable to students (including those identified as homeless or in foster care), take into consideration the schedule and graduation requirements of the sending LEA, and ensure that students will meet the graduation standards of the receiving LEA.

3. Strategies to Address Other Problems (722(g)(1)(H) of the *McKinney-Vento Act*): Provide strategies to address other problems with respect to the education of homeless children and youth, including problems resulting from enrollment delays that are caused by—
 - i. requirements of immunization and other required health records;
 - ii. residency requirements;

- iii. lack of birth certificates, school records, or other documentation;
- iv. guardianship issues; or
- v. uniform or dress code requirements.

Immunization and Other Health Records

Once LEA officials have determined that an enrolling student is homeless, the LEA's homeless liaison must assist the student in obtaining his/her education, immunization, medical, and other records. According to McKinney-Vento, the student must be enrolled in the interim. If the homeless liaison is unable to obtain prior immunization records within 30 days of enrolling and the student is still eligible for services under the homeless education program; the student must begin the immunization series and demonstrate that satisfactory progress has been accomplished within 90 days. If the homeless student maintains that he/she is exempted from receiving immunizations, then after thirty 30 days the student must provide documentation in accordance with the exemption requirements provided for in state statute § 167.181.3, RSMo.

<http://health.mo.gov/living/wellness/immunizations/pdf/1516surveyform.pdf>

Residency Requirements

Homeless children and youth are not subject to the same residency requirements as other students as defined in §167.020.2 and 3, RSMo.

Birth Certificates, School Records or Other Documentation

Once LEA officials have determined that an enrolling student is homeless, the LEA's homeless liaison must assist in the student in obtaining his/her education, immunization, medical and other records.

Other Services and Opportunities

Children and youths in homeless situations are entitled to services comparable to those offered to other students. These include, but are not limited to, services for children and youths with disabilities, programs for students with limited English proficiency, vocational and technical education programs, and programs for gifted and talented students.

Children and youths who are homeless are also eligible for school nutrition programs sponsored by the U.S. Department of Agriculture and for services under Title I of the Elementary and Secondary Education Act that target students most at risk of failing in school.

- 4. Policies to Remove Barriers (722(g)(1)(I) of the McKinney-Vento Act): Demonstrate that the SEA and LEAs in the State have developed, and shall review and revise, policies to remove barriers to the identification of homeless children and youth, and the enrollment and retention of homeless children and youth in schools in the State, including barriers to enrollment and retention due to outstanding fees or fines, or absences.

The SEA monitors LEAs through the Tiered Monitoring of Federal Programs and reviews LEAs policies used to identify homeless children and youth. This includes a review of enrollment and retention policies for homeless children and youth. SEA staff also reviews policies and procedures concerning homeless students for any barriers to enrollment and retention due to outstanding fees, fines, or absences. Through the use of the Tiered Monitoring, LEAs are required to submit documentation to the SEA outlining the procedures that are used to survey the enrolled student body and how the LEA identifies those students who are homeless. Those identification efforts must be

coordinated with school personnel and community agencies. LEAs are required to use student enrollment forms to help identify homeless students and are required to have ongoing communication and professional development with community partners in an effort to increase awareness of McKinney-Vento and help the LEA identify potentially homeless students.

5. Assistance from Counselors (722(g)(1)(K)): A description of how youths described in section 725(2) will receive assistance from counselors to advise such youths, and prepare and improve the readiness of such youths for college.

Every LEA in Missouri is required to have a staff member designated as the homeless liaison. Homeless liaisons advocate for youths described under 725(2). Among the advocacy duties are ensuring that students receive support from counselors to assist such youths to prepare and improve readiness for college.

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