

FEDERAL PROGRAMS

Missouri Department of Elementary and Secondary Education

HOMELESS CHILDREN AND YOUTH GRANT PROGRAM

TITLE VII-B OF THE MCKINNEY-VENTO HOMELESS ASSISTANCE ACT

AS AMENDED BY THE
EVERY STUDENT SUCCEEDS ACT, DECEMBER 2015

42 U.S.C. 11431 ET SEQ.

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2017-2020 Administrative Manual

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2017-2020 TIMELINE FOR FEDERAL PROGRAMS HOMELESS CHILDREN & YOUTH GRANT PROGRAM

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Timeline	
Application Webinar	June 2017
Letter of Announcement (If required by your LEA)	June 1, 2017
Application Postmark* Deadline	<i>Friday, June 23, 2017</i>
Grant Reading	June/July 2017
Grant Award Announcements	July, 2017
Project Starting Date	July 1, 2017
Project Ending Date	June 30, 2020
Project Evaluation Reports Due	July 31, 2018 (Year 1) July 31, 2019 (Year 2) July 31, 2020 (Year 3)
Final Expenditure Report Due	July 31, 2018 (Year 1) July 31, 2019 (Year 2) July 31, 2020 (Year 3)
Records May Be Destroyed	July 1, 2023
Grant Contact	Donna Cash 573-522-8763 donna.cash@dese.mo.gov

****The original application and 3 copies must be postmarked no later than June 23, 2017.
Or electronic copies of this application will be accepted by the
end of business, 3:30 p.m. on Friday, June 23, 2017.***

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GENERAL APPLICATION INFORMATION

INTRODUCTION

Applicants should review this Administrative Manual as well as the application for the Federal Programs Homeless Children and Youth Grant. The application alone does not contain all instructions and information needed to complete the grant application.

The full text of the McKinney-Vento Homeless Assistance Act is posted on the Department's website at: <https://dese.mo.gov/quality-schools/federal-programs/homeless/legislation-guidance>

This Administrative Manual provides administrative information for the following federal program:

- Homeless Children and Youth Grant Program

We have made a sincere effort to simplify the Local Educational Agencies (LEAs) submission of required information and to make the application procedure more accessible through a web document that can be downloaded, completed, and **returned as a paper copy or an electronic PDF document**.

The remaining sections of this manual provide general guidelines applicable to this grant program.

GENERAL GUIDELINES

PURPOSE

The purpose of the McKinney-Vento Subgrant Program is to facilitate the enrollment, attendance, and school success of homeless children and youth. Services provided **must not replace** the regular academic program and must be designed to expand upon or improve services already provided under the LEA requirements for serving homeless students.

ELIGIBLE APPLICANTS

Individual LEAs are eligible to apply.

FISCAL AND COMPLIANCE AUDITS

All LEAs must arrange for an independent audit of their records, at least biennially and provide a copy of the audit to the Missouri Department of Elementary and Secondary Education (the Department) School Finance Section by October 31 following the audit period.

EXCULSION OF APPLICATIONS

Applications may be excluded from the McKinney-Vento Subgrant Program competition for any one or more of the following reasons:

6. A hand-delivered, postmarked, or electronic grant application was made after the deadline due date.
7. A LEA has failed to maintain maintenance of fiscal effort.
8. The grant application scores a zero in any one grant category.

SUBGRANT AVAILBLE FUNDING

Pending receipt of federal funding for this grant program, grantees who receive funding will be awarded and funded for the 2017-18, 2018-19, and the 2019-2020 school years. Grantees will receive funding at the same funding level for the second and third years of the subgrant *pending availability of federal funding and contingent on subgrantees meeting the monitoring and reporting requirements for the grant program.*

FUNDING FOR SUBGRANTS

LEAs may apply for funding based on the number of homeless children and youth being educated in the LEA up to a maximum level of \$400 per homeless child. The minimum grant award is \$8,000 (20 students). The maximum amount an LEA may apply for is \$150,000 (375+ students) regardless of the number of homeless children and youth being educated in the LEA.

USE OF FUNDS

In addition to fulfilling LEA requirements and liaison duties under the McKinney-Vento Act, there are 16 authorized activities for which subgrant program funds may be used. These 16 activities are listed in Appendix I on pages 62 and 63 of this Administrative Manual.

DURATION OF SUBGRANTS

Subgrants funded under this program can access funding beginning on July 1, 2017. The first program period ends June 30, 2018. Subgrants will be renewable for an additional two years at the same funding level, **assuming federal funds are available, assuming the program is implementing its funded activities, and has submitted the required reporting instruments.** No carryover funding is allowed for this grant program. Any unused grant funding must be refunded to the Department of Elementary and Secondary Education.

APPLICATION

LEAs applying for Homeless Children and Youth funding must submit an application once every three years. **Funds may not be obligated for a given year until July 1 or the date a substantially approvable application date is sent to the LEA from the Department, whichever comes later.**

APPLICATION LENGTH AND FORMAT

Do not include a cover letter or send the instructions back with the grant application.

Submitted applications should begin with page one of the grant application and conclude with page 20 which is *Section IX-B. Homeless Children and youth Program Administrative Costs –Year 3* of the grant application. The grant application cannot exceed 41 pages in length.

Application Format:

- 1-inch margins (except application forms)
- Maximum pages submitted is limited to 41 pages
- Narratives: 12 point font
- Application Forms: **Use the provided form only**
- Font: Times New Roman
- Double-spaced, one-sided pages
- Paper clip original application and submit with original signature
- **No notebooks or binders need be submitted**
- Electronic versions of the grant applications may be submitted by the deadline date to donna.cash@dese.mo.gov

To be eligible to compete for a Homeless Children and Youth Grant, a LEA must have at least 20 identified homeless students. *No faxed copies of the grant application will be accepted.*

All required components are to be received by the Department at the same time and all components must be available for Department staff and grant readers by the grant deadline.

BUDGET AMENDMENTS

A LEA may amend the approved budget throughout the year. The Department will not accept written requests for pre-approvals. Grant recipients are allowed to move 10% of their **total** budget within the budget categories without submitting an amendment. No amendment would be needed to move money within the category between budgeted items. **New expenditures (items) or activities may not be added to the approved budget.**

FINAL EXPENDITURE REPORT (FER)

A LEA with an approved grant application must submit a final expenditure report (FER) 30 days after the ending date of the project. FERs must reflect the actual expenditures/obligations which have been incurred for the grant project. LEAs are allowed to submit revised FERs for federal programs. The FER in ePeGS should reflect what was submitted in the approved budget or the last approved budget revision. Expenditures will be reported by both object and function codes. Expenditures in approved object codes may not exceed 10 percent of the total amount budgeted within each of the approved programs.

REQUIRED DATA COLLECTION AND REPORTS

At the end of each funded school year, subgrantees will be asked to submit a Project Evaluation Report. Subgrant renewal and continuation funding may be delayed if this required report has not been completed for the prior year.

Project Evaluation Reports are used to monitor compliance and ensure programs are meeting performance goals. Reporting is also a method for self-evaluation. Program staff should examine interim student performance and attendance data regularly to determine whether activities are successful in improving attendance and academic performance among homeless students. If improved student performance is not reflected in data, program activities may need revision. Project Evaluation Reports should include data and should include narrative. **Narratives should be at least 3 pages in length, and be submitted to the State Coordinator no later than 30 days after the project ending date of June 30th.**

FEDERAL COMPLIANCE requires a project evaluation.

ENDING DATE OF PROJECT

All project activities and obligations must be concluded by June 30th of the yearly grant cycle.

TITLE I.A SET-ASIDES AND OTHER BUDGETARY SUPPORT

Contributions to project budgets from other sources such as other public funds or services, foundations, donations (whether cash or in-kind assistance), increase the competitiveness of applications and helps to assure district compliance with rules against supplanting.

Districts receiving Title I.A funds must reserve a portion of the total district allocation for services to homeless students. For further guidance on the Title I.A Homeless set-aside, please see pages 26-30.

PROVISION OF SERVICES

Under Section 723 of the McKinney-Vento Act, in general, services provided under McKinney-Vento Subgrant Programs;

- May be provided through programs on school grounds or at other facilities;
- Shall, to the maximum extent practical, be provided through existing programs and mechanisms that integrate homeless children and youths with non-homeless children and youths; and
- Shall be designed to expand or improve services provided as part of a district's regular academic program, but not to replace such services provided under that program.

REQUIREMENTS TO PROVIDE HOMELESS EDUCATION TRAINING

Each year, subgrantees will be obligated to host at least one training event. This training should be made available to other LEAs at no cost. Such training could include peer support, basic liaison duties, district responsibilities, best practices, networking and may also include information on related subjects (e.g., screening and assessment services for early intervention, working with unaccompanied youths, completion of college financial aid applications, etc.).

Training obligations should be documented with agendas, sign-in sheets, and methods of notification to other LEAs and service providers. Once training has occurred, documentation of these trainings should be sent to the State's Homeless Coordinator.

OBLIGATION OF FUNDS

LEAs may use grant funds only for obligations (encumbrances) made during the grant period. The following table shows when an obligation is made for various kinds of property and services.

IF THE OBLIGATION IS FOR--	THEN THE OBLIGATION IS MADE--
Acquisition of real or personal property:	On the date the grantee makes a binding written commitment to acquire the property.
Personal services by an employee of the grantee:	When the services are performed.
Personal services by a contractor who is not an employee of the grantee:	On the date on which the grantee makes a binding written commitment to obtain the services.
Performance of work other than personal services:	On the date on which the grantee makes a binding written commitment to obtain the work.
Public utility services:	When the grantee receives the services.
Travel:	When the travel is taken.
Rental of real or person property:	When the grantee uses the property.
A pre-agreement cost that was properly approved by the Secretary under the cost principles identified in 34 CFR 74.171 or 80.22:	

PAYMENT

Starting with Fiscal Year 2009, each eligible recipient serving as a fiscal agent will be responsible for submitting payment requests to the Department through ePeGS. Districts may access a copy of the DESE Web Systems User ID Request Form at: <https://apps.dese.mo.gov/webLogin/Register.aspx>

Payments and Revisions must be made through ePeGS. Payment request guidance can be found here: <https://dese.mo.gov/financial-admin-services/eseanclb-finance>

INDIRECT AND ADMINISTRATIVE COSTS

The Homeless Children and Youth Program allow indirect costs. However, administrative costs and indirect costs combined **cannot exceed 5 percent** of the LEAs total proposed budget. If indirect cost is applied, the LEAs restricted rate must be used. Indirect costs are calculated by multiplying total direct costs (less costs for capital outlay and interest) by the approved LEAs restricted indirect cost rate. In addition, all administrative costs must comply with the Office of Management and Budget Circular A-87 (Cost Principles for State, Local and Indian Tribal Governments).

https://www.whitehouse.gov/sites/whitehouse.gov/files/omb/circulars/A87/a87_2004.pdf

ACCOUNTING REQUIREMENTS

Separate and identifiable accounting records for receipts and expenditures in each program must be maintained. Records of both obligations and expenditures are to be kept separately by expenditure code. If staff are paid with grant funds (stipends for workshop attendance or hourly rates for out-of-contract time), there must be documentation of time for payment purposes (sign-in forms for workshops and hours listed for out-of-contract time).

The LEA may **not** combine funds under Titles I, II, III, IV, VI, and/or Migrant Education Program, except as they are used in an administrative pool or a school-wide program. When funds are used in an administrative pool or a school wide-program however, the LEA must develop a separate source code for reporting expenses to each of these fiscal strands. **Funds from Homeless Children and Youth Program cannot be placed in an administrative pool.**

REVENUE CODES

The following revenue code should be used by LEAs for discretionary funds received from the federal government through the Department:

Homeless Children and Youth Program	5463
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PROGRAM RECORDS

All records must be retained:

- For three years after the close of the fiscal year in which funds were expended.
- Until any pending audits have been completed.
- Until all findings and recommendations arising from audits or monitoring has been completely resolved.

INVENTORY CONTROL

All materials and capital outlay costing \$1,000 or more per unit/set are subject to specific inventory management and control requirements as follows:

1. Items acquired using federal or state monies shall be physically marked by source of funding.
2. Inventory must be current and available for review and audit. The following information must be included:
 - a description of the property, including manufacturer's model number, if any
 - manufacturer's serial number or other identification number
 - identification of the funding source under which the property was acquired
 - acquisition date and unit cost
 - source of property (company name)
 - percentage of federal funds used in the purchase of the property
 - present location, use, condition of the property, and date the information was reported
 - all pertinent information on the ultimate transfer, replacement, or disposition of the equipment
3. Inventory must be updated as items are purged or new purchases are made.
4. Adequate safeguards must be in effect to prevent loss, damage, or theft of the property. Any loss, damage, or theft must be investigated and fully documented. The LEA is responsible for replacing or repairing lost, damaged, destroyed, or stolen property. If stolen property is not recovered, the LEA should submit copies of the investigative report and insurance claim to the Department. Replaced equipment is automatically considered discretionary grant equipment and should be inventoried accordingly.
5. Adequate maintenance procedures must be implemented.
6. A physical inventory of items must be taken and the results reconciled with the inventory records at least once every two years.

DISPOSITION OF CAPITAL OUTLAY

Equipment is all property costing over \$1,000 that is electrical or mechanical in nature and which would normally be repaired instead of discarded or replaced. Equipment with an acquisition cost of **less than \$2,000** which is at least five years old and no longer effective may be purged or transferred to the LEA at no cost, upon the Department's approval. Records of transferred equipment must be retained for three years from date of transfer. The written request to purge or transfer must include:

- item description (including model and serial number)
- date of acquisition
- original cost
- reason for purge or transfer and anticipated use

LEAs must request from the Department disposition instructions for capital outlay with an acquisition cost of **\$2,000 or more** per unit. LEAs given permission to purge equipment less than five years old will not be given approval to purchase similar equipment until the five-year period has ended.

BUDGET CATEGORIES SUMMARY

6100 *Salaries* - Amounts paid for full- and part-time employees of the LEA, including:

- full- and part-time certificated teachers
- substitute teachers
- supplemental pay (extra-curricular for certificated personnel)

6150 *Non-Certified Salaries* - Amounts paid for full- and part-time employees of the LEA, including:

- full- and part-time non-certificated employee pay
- unused sick or severance pay for non-certificated employees
- supplemental pay (extra-curricular for non-certified personnel)

6200 *Employee Benefits* - Amounts paid by the LEA on behalf of employees over and above the gross salary; not paid directly to employee. Benefits include:

- teacher and non-teacher retirement
- Old Age, Survivors and Disability Insurance (OASDI), and Medicare
- employee insurance (e.g., dental, life)
- worker's compensation
- unemployment compensation
- other employee-provided services

6300 *Purchased Services* - Amounts paid for personnel not on the LEA's payroll, and for services required by the LEA. Such services may be purchased from another LEA. The following may fall under this category:

- professional and technical services (e.g., architectural, legal, dental)
- instructional (e.g., tuition paid to other districts; curriculum consultants)
- pupil and staff services
- audit, data processing, and like services
- property services (e.g., cleaning, repairs, maintenance)
- transportation (contracted and non-contracted)
- staff travel
- insurance (other than employee benefits)
- communication (e.g., advertising, printing)
- other (e.g., contracted food services)

6400 *Supplies and Materials* - Amounts paid for expendable items that are consumed, worn out, or which become part of more complex units or substances. These include:

- general supplies, including freight and cartage
- free and regular textbooks
- library books, periodicals, resource materials
- food (items usually claimed on the School Food Service Reimbursement form)
- energy (electric, gas, oil)
- other supplies and materials

6500 *Capital Outlay* - Expenditures for fixed assets or additions to fixed assets. Capital outlay is considered to be an object that is purchased. Unit cost must be over \$1,000. It covers:

- land, buildings, and other improvements
- regular equipment

- instructional equipment
- vehicles
- other capital outlay

NOTE: Detailed expenditure object codes and function code descriptions may be found in the Missouri Financial Accounting Manual, Section E: Revenue Object Codes and Section F: Function Codes.

<https://dese.mo.gov/financial-admin-services/school-finance/mo-financial-accounting-manual>

SECTION IX- A. - HOMELESS CHILDREN AND YOUTH PROGRAM ACTIVITY BUDGET—YEAR 1	
BUDGET ITEMIZATION	GRANT FUNDS REQUESTED
6100: CERTIFICATED SALARIES	
Homeless Liaison (.50 FTE)	\$23,000
Homeless Case Manager (1 FTE)	\$42,659
6100 SUBTOTAL	\$65,659
6150: NON-CERTIFICATED SALARIES	
6150 SUBTOTAL	\$00.00
6200: EMPLOYEE BENEFITS (OPTIONAL CATEGORIES)	
FICA	
Medicare	\$3,127
Retirement (Teacher or Non-Teacher)	\$3,872
Health, Life, and/or Dental Insurance	\$4,416
Other Benefits	\$1,175
6200 SUBTOTAL	\$12,590
6300: PURCHASED SERVICES	
Professional Development to attend local and national conferences -	\$5,000
Transportation costs – cabs, bus passes, mileage reimbursement	\$40,000
SAMPLE	
6300 SUBTOTAL	\$45,000
6400: MATERIALS/SUPPLIES	
School supplies	\$4,000
School clothing	\$1,000
Books	\$1,000
Hygiene supplies	\$1,000
Program supplies (office supplies)	\$500
Snack for tutoring	\$250
6400 SUBTOTAL	\$7,750
6100-6400 SUBTOTAL	\$130,999
INDIRECT COST OPTIONAL (Restricted Rate: ____% X Subtotal)	\$0
6500: CAPITAL OUTLAY	
Laptop for shelter tutoring - \$1,000	\$1,000
6500 SUBTOTAL	\$1,000
TOTAL - (TRANSFER TO SECTION I – TOTAL BUDGETS BY PROGRAM)	\$131,999

STUDENT PRIVACY AND SOCIAL SECURITY NUMBERS

The Privacy Act of 1972, among other things, established the criteria by which an organization can legitimately request certain kinds of personal information from its patrons. In the case of Social Security numbers, the law is interpreted to mean that any organization or agency wishing to use this number must have a legitimate reason for doing so. Employers, for example, may require it in order to comply with reporting obligations to the Internal Revenue Service.

Since LEAs have no such obligations, that is, no legitimate reason for having the number, they may *not* require or even suggest students provide a Social Security number to enroll in school. While having the number may be a convenience, requiring it is in clear violation of the law. Appendix D contains the Guidelines Regarding the Use of Social Security Numbers.

Certain entities with which many schools are associated can and do legitimately require Social Security numbers. Two common ones are social services, such as Medicaid, and college and university scholarship sources. In these cases, LEAs can explain the reasons for using Social Security numbers, and instruct the student or parent(s) wishing to apply for the service to do so directly, *without giving the number to the school*. Some other services used by LEAs, such as the state Dropout Hotline, request Social Security numbers but cannot require them; here again the number is used as a convenience.

In summary, LEAs should take the following steps to ensure no one is discouraged from enrolling in public schools:

- Remove all blanks for Social Security numbers from enrollment forms and other school documents.
- Instruct all LEA staff, both professional and support, that Social Security numbers are not required of students to enroll in school, *or to apply for and receive free or reduced lunches*.
- Refrain from asking for any other information or documents that can be tied to U.S. residency.

PARTICIPATION OF PRIVATE SCHOOL CHILDREN AND EDUCATORS

LEAs are encouraged to discuss with private schools the services that may be provided by the Homeless Children program to eligible private school children, their teachers, or other educational personnel. Services to nonpublic school children must be performed on public or neutral grounds if applicable to a specific discretionary program. The Constitution and laws of the State of Missouri and federal laws apply. If you have specific questions about the participation of private school children and educators, please call the Director of Federal Compliance at 573-751-3468.

CONTROL OF PUBLIC FUNDS

The public school district controls funds, employment, and contracts used to provide services to nonpublic students. Services shall be provided by employees of a public agency or through contract with an individual, association, agency, or organization independent of the private school and any religious organization. The LEA makes the final decision with respect to the services provided to nonpublic children with funds from the federal or state discretionary programs.

COMPLAINT RESOLUTION PROCEDURES

LEAs **must** have board-adopted, written procedures to resolve allegations of violations of requirements under the federal or state programs. The procedures should be made known and a copy maintained in each building. The Department has adopted written procedures in the event a complainant disputes a LEA decision. LEAs must disseminate, free of charge, adequate information about the complaint procedures to parents of students and appropriate LEA officials or representatives. To review the complaint resolution process recommended by the Department of Elementary and Secondary Education, please visit our website at:

<https://dese.mo.gov/sites/default/files/ComplaintProcedure.pdf>

SUSPENSION OF APPROVAL

When the Department finds a LEA receiving funds under a federal or state program has failed to comply with legal requirements or with the approved application, corrective action must be taken immediately and documentation must be submitted to the Department within a reasonable period of time (generally within two months). Failure to respond adequately will result in either or both of the two following actions:

- Suspension of further payments for the noncompliant program until appropriate documentation is provided;
- Denial of the use of funds for all or part of the cost of the program activity not in compliance.

MONITORING

The Department will monitor recipients receiving McKinney-Vento funds by either/or:

- On-site monitoring of McKinney-Vento grants.
- On-site monitoring of any program out of compliance which receives McKinney-Vento funding.
- Desk monitoring of all recipients of McKinney-Vento funds through the Project Evaluation Report.
- On-site monitoring if desk monitoring suggests deficiencies with programs receiving McKinney-Vento funding.
- On-site monitoring or desk monitoring of McKinney-Vento grants when a LEA is scheduled for a Federal Monitoring review.

The following tools will be used during those monitoring visits:

- Federal Compliance personnel will monitor LEAs receiving McKinney-Vento funding on-site using the tiered monitoring process.
 - If the LEA is in compliance, a letter will be sent informing the LEA they are in compliance.
 - If the LEA is not in compliance, a letter will be sent informing the LEA what is needed to ensure compliance with a deadline.
 - If the LEA is not in compliance and a follow up visit is required, Federal Compliance personnel will set up additional on-site monitoring visits.
 - Once the LEA is in compliance, a letter will be sent informing the LEA they are in compliance.
 - If the LEA is not able to become in compliance, funding will be in jeopardy.
- Federal Compliance personnel will monitor LEAs receiving McKinney-Vento funding yearly through a desk monitoring using the Project Evaluation Report.
- Additionally, Federal Compliance personnel, monitor LEAs receiving and those not receiving McKinney-Vento funds through the tiered monitoring process. Monitoring will include a review of all the policies and procedures pertaining to the LEAs homeless children and youth program. This will include: monitor all the policies and procedures pertaining to enrollment identification, needs assessment, placement, services, records transfer, resolution of grievances, and the district identification of a working Homeless Liaison. Through this process, LEAs are assigned to one of three cohort groups. Additionally, the tiered monitoring process has four components: desk audit, desk-monitoring, on-site monitoring, and telephone monitoring. Implementation of these components will be phased in over a five year period beginning in SY 2011-2012.

For more information on the tiered monitoring process, see: <https://dese.mo.gov/quality-schools/federal-programs/nclb-tiered-monitoring>

A list of cohort groups is available on-line at: <https://dese.mo.gov/sites/default/files/qs-fc-cohort-list-aug-2015.pdf>

SCHOOL BUSES

School buses are the safest way of transporting children since buses are designed with special safety features called compartmentalization. Compartmentalization is a passive crash protection system that includes strengthened bus bodies, close spacing of the seats, padded, flexible, and higher seat backs.

LEAs may use LEA-owned buses or contract with a school bus company to provide transportation services. The school bus contractor must comply with all state statutes and State Board of Education regulations that govern transportation by Missouri public LEAs.

PUPIL TRANSPORTATION IN VEHICLES OTHER THAN SCHOOL BUSES 5 CSR 30-261.045

PURPOSE: Section 304.060, RSMo, authorizes vehicles other than approved school buses to be used for transportation of students. This rule establishes standards for transportation in vehicles other than approved school buses.

- (1) Requirements for transportation of students in vehicles designed for transporting more than ten (10) passengers including the driver.
 - (A) After July 1, 2001, newly purchased, newly leased, newly placed into service, newly contracted vehicles or vehicles replaced under contracted services with a rated capacity, as defined by the manufacturer, to carry more than ten (10) passengers including the driver that are used to transport students to or from school or to transport students to or from any place for educational purposes or school purposes shall meet state and federal specification and safety standards applicable to school buses. Contract common carriers meeting federal Department of Transportation standards may be used for field trips as outlined in section (3) of this rule.
- (2) Requirements for transportation of students in vehicles designed for transporting ten (10) passengers or less including the driver.
 - (A) The number of passengers, including students and driver, that may be transported at any one (1) time shall be limited to the number the manufacturer suggests as appropriate for that vehicle in accordance with section 304.060, RSMo, or if not posted in the vehicle, then limited to the number of seat belts in the vehicle.
 - (B) The driver and each passenger shall be properly secured with the appropriate seat restraint at all times while the vehicle is in motion.
 - (C) Motor vehicles designed for enclosed passenger transportation may be used subject to approval by the local board of education.
 - (D) Motor vehicles shall be licensed according to law and shall display a current state safety inspection sticker.
 - (E) The driver of a LEA owned or LEA contracted vehicle shall have a valid Missouri operator's license for the motor vehicle and comply with section 302.272, RSMo, and 5 CSR 30-261.010(2)(A)1-3, not to include a parent or guardian transporting only their children under a written contract with the LEA and who is not compensated by the LEA. The parent or guardian shall have a valid Missouri operator's license for the vehicle operated as per 5 CSR 30-261.010(2)(A).
 - (F) The driver of a privately owned vehicle who is not compensated by the LEA to transport students to and from school or school related events shall have a valid Missouri operator's license for the vehicle operated as per 5 CSR 30-261.010(2)(A). This shall include any person who transports school children as an incident to employment with a school or LEA, such as a teacher, coach, administrator, secretary, school nurse, or janitor unless such person is under contract with or employed by a school or LEA as a school bus operator as per section 302.010 (19), RSMo. Compensation shall be defined for the purpose of this section as any reimbursement received by the driver that exceeds the average cost of operating a car per mile as established by the American Automobile Association.

- (G) Motor vehicles shall have liability insurance coverage in accordance with section 537.610, RSMo, and as required by the local board of education.
 - (H) When transportation service in motor vehicles other than those licensed as school buses is contracted, there shall be a written contract between the LEA and the individual or firm providing the service.
- (3) Requirements for Transportation of Students in Authorized Common Carriers.
- (A) Authorized common carriers shall only be used to transport students to and from field trips or other special trips for educational purposes and shall not be used to transport students to and from school. Authorized common carriers, as used in this rule, are over-the-road intercity-type coaches equipped with reclining seats, air conditioning and restroom facilities, and holding authority from the Missouri Department of Economic Development, Division of Motor Carrier and Railroad Safety, or the Federal Motor Carrier Safety Administration.
 - (B) There shall be a written contract between the LEA and individual or firm providing the vehicle.
 - (C) All contracts with authorized common carriers shall include:
 - 1. Proof of liability insurance in the amount of five (5) million dollars per accident; and
 - 2. Proof of safety inspection and compliance with applicable federal Motor Carrier Safety Regulations.
 - (D) The driver of an authorized common carrier shall hold a valid Missouri commercial driver's license or a similar license valid in any other state and shall comply with all applicable driver qualifications of the federal Motor Carrier Safety Regulations.

If you have any questions regarding the above information, refer to the School Transportation Administrator's Handbook found on the following website: <https://dese.mo.gov/financial-admin-services/school-transportation/administrators-handbook>

**HOMELESS CHILDREN AND YOUTH PROGRAM
TITLE VII-B OF THE MCKINNEY-VENTO HOMELESS ASSISTANCE ACT, AS
AMENDED BY THE EVERY STUDENT SUCCEEDS ACT**

SPECIFIC GUIDELINES

INTRODUCTION

The Education for Homeless Children and Youth (EHCY) program is authorized under Title VII-B of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.) (McKinney-Vento Act). The McKinney-Vento Act was originally authorized in 1987 and most recently re-authorized in December 2015 by the Every Student Succeeds Act (ESSA).

The EHCY program provides state education agencies with grant funds to carry out policies ensuring homeless children and youth access to a free, appropriate public education including a public preschool education which is provided to the children of a resident of a state and is consistent with the state's school attendance laws. In addition, funds are used to review and revise the residency requirements of compulsory state school attendance laws if these laws present barriers to free and appropriate education of homeless children and youth.

Under the McKinney Act, each state is required to:

- ensure that each child of a homeless individual and each homeless youth has equal access to the same free, appropriate public education, including a public preschool education, provided to other children and youth;
- review and undertake steps to revise such laws, regulations, practices, or policies having a compulsory residency requirement as a component that may act as a barrier to enrollment, attendance, or success in school of homeless children and youth and to ensure them the same free, appropriate public education provided to other children and youth;
- ensure that homelessness alone should not be sufficient reason to separate students from the mainstream school environment; and
- ensure homeless children and youth access to education and other services such children and youth need to meet the same challenging state student performance standards to which all students are held.

In accordance with the McKinney-Vento Homeless Assistance Act, as amended by the Every Student Succeeds Act (ESSA), the State of Missouri is in the process of updating its State Plan for Homeless Children and Youth. This updated plan will be designed to aid Missouri's LEA's with the federal and state educational requirements of homeless children and youth.

The current State Plan is available at the following link and the updated State Plan will also be made available in the Fall of 2017:

<https://dese.mo.gov/quality-schools/federal-programs/homeless/serving-homeless-children>

ELIGIBLE GRANT APPLICANTS

LEAs having an identified homeless population of 20 or more homeless children and youth per year are eligible to apply, on a competitive basis, for grant funds to provide educational support services for homeless children and youth.

HOMELESS CHILDREN & YOUTH GRANT FUNDING

LEAs may apply for funding based on the number of homeless children and youth being educated in the LEA up to a maximum level of \$400 per homeless child. The minimum amount of an approvable grant is \$8,000. The maximum amount any LEA may apply for is \$150,000 (375+ students) regardless of the number of homeless children and youth being educated in the LEA.

ALLOWABLE USE OF GRANT FUNDS

LEAs must use McKinney-Vento funds to assist homeless children and youths in enrolling, attending, and succeeding in school. (722(g)(6), 723(d)). In particular, the funds may support the following activities:

1. Tutoring, supplemental instruction, and other educational services that help homeless children and youths reach the same challenging State academic standards the State establishes for other children and youths. (Section 723(d)(1)). As clearly specified in the ESEA, all academic enrichment programs for disadvantaged students, including programs for homeless students, must be aligned with State standards and curricula. Additionally, when offering supplemental instruction, LEAs should focus on providing services for children and youths that reflect scientifically based research as the foundation for programs and strategies to ensure academic success.
2. Expedited evaluations of eligible students to measure their strengths and needs. (Section 723(d)(2)). These evaluations should be done promptly in order to avoid a gap in the provision of necessary services to those children and youths. Evaluations may also determine a homeless child or youth's possible need or eligibility for other programs and services, including educational programs for gifted and talented students; special education and related services for children with disabilities under Part B of the IDEA; special education or related aids and services for qualified students with disabilities under Section 504; early intervention services for eligible infants and toddlers with disabilities under Part C of the IDEA; programs for English learners; career and technical education; meals through the National School Lunch Program and School Breakfast Program; and other appropriate programs or services under the ESEA. (Section 723(d)(2)).
3. Professional development and other activities for educators and specialized instructional support personnel that are designed to heighten the understanding and sensitivity of such personnel to the needs of homeless children and youths, the rights of such children and youths under the McKinney-Vento Act, and the specific educational needs of runaway and homeless youths. (Section 723(d)(3)).
4. Referrals of eligible students to medical, dental, mental, and other health services. (Section 723(d)(4)).
5. Assistance to defray the excess cost of transportation not otherwise provided through Federal, State, or local funds, to enable students to remain in their schools of origin. (Section 723(d)(5)).
6. Developmentally appropriate early childhood education programs for preschool-aged homeless children that are not provided through other Federal, State, or local funds. (Section 723(d)(6)).
7. Services and assistance to attract, engage, and retain homeless children and youths, particularly homeless children and youths who are not enrolled in school, in public school programs and services provided to non-homeless children and youths. (Section 723(d)(7)).

8. Before- and after-school, mentoring, and summer programs for homeless children and youths in which a teacher or other qualified individual provides tutoring, homework assistance, and supervision of educational activities. (Section 723(d)(8)).
9. Payment of fees and costs associated with tracking, obtaining, and transferring records necessary to enroll homeless children and youths in school. The records may include birth certificates, immunization or other required health records, academic records, guardianship records, and evaluations for special programs and services. (Section 723(d)(9)).
10. Education and training for parents and guardians of homeless children and youths about the rights of, and resources available to, such children and youths, and other activities designed to increase the meaningful involvement of parents and guardians of homeless children or youths in the education of such children or youths.
11. Coordination between schools and agencies providing services to homeless children and youths in order to expand and enhance such services. Coordination with programs funded under the Runaway and Homeless Youth Act must be included in this effort. (Section 722(g)(5)(A)(i)).
12. Specialized instructional support services, including violence prevention counseling, and referrals for such services. (Section 723(d)(12)).
13. Programs addressing the particular needs of homeless children and youths that may arise from domestic violence and parental mental health or substance abuse problems. (Section 723(d)(13)).
14. Providing supplies to non-school facilities serving eligible students and adapting these facilities to enable them to provide services. (Section 723(d)(14)).
15. Providing school supplies, including those to be distributed at shelters or temporary housing facilities, or other appropriate locations. (Section 723(d)(15)).
16. Providing extraordinary or emergency services needed to enable homeless children and youths to attend school and participate fully in school activities. (Section 723(d)(16)).

MAINTENANCE OF FISCAL EFFORT

LEAs may receive funding under the Homeless Children and Youth Program without penalty only if the combined state and local expenditures for free public education for any fiscal year was not less than 90 percent of the combined state and local expenditures for the prior fiscal year. DESE determines maintenance of fiscal effort using data from the Annual Secretary of the Board Report. For more information on Maintenance of Fiscal Effort (MOE) please visit:

<https://dese.mo.gov/sites/default/files/comparmanefforwksht.pdf>

REQUIREMENTS FOR SERVING HOMELESS CHILDREN AND YOUTH

Every LEA in the state should be aware of the following information regardless of whether they receive a McKinney-Vento Subgrant for Homeless Children and Youth.

LEA HOMELESS LIAISON

The local liaison serves as one of the primary contacts between homeless families and school staff, district personnel, shelter workers, and other service providers. Every LEA, whether or not it receives a McKinney-Vento subgrant, is required to designate a local liaison. (Section 722(g)(1)(J)(ii)). The liaison coordinates services to ensure that homeless children and youths enroll in school and have the opportunity to succeed academically.

Local liaisons must ensure that:

- Homeless children and youths are identified by school personnel through outreach and coordination activities with other entities and agencies;
- Homeless children and youths are enrolled in, and have full and equal opportunity to succeed in, the school or schools of the LEA;
- Homeless families and homeless children and youths have access to and receive educational services for which such families, children, and youths are eligible, including services through Head Start programs (including Early Head Start programs), early intervention services under Part C of the IDEA, and other preschool programs administered by the LEA;
- Homeless families and homeless children and youths receive referrals to health, dental, mental health, and substance abuse services, housing services, and other appropriate services;
- Parents or guardians of homeless children and youths are informed of educational and related opportunities available to their children and are provided with meaningful opportunities to participate in the education of their children;
- Public notice of the educational rights of homeless students is disseminated in locations frequented by parents and guardians of such children and youths, and unaccompanied youths, including schools, shelters, public libraries, and soup kitchens, in a manner and form understandable to the parents and guardians and unaccompanied youths;
- Enrollment disputes are mediated in accordance with the requirements of the McKinney-Vento Act;
- Parents and guardians and unaccompanied youths are fully informed of all transportation services, including transportation to and from the school of origin and are assisted in accessing transportation services;
- School personnel receive professional development and other support; and
- Unaccompanied youths are enrolled in school, have opportunities to meet the same challenging State academic standards as the State establishes for other children and youths, are informed of their status as independent students under section 480 of the Higher Education Act of 1965 (HEA) (20 U.S.C. 1087vv), and their right to receive verification of this status from the local liaison. (Section 722(g)(6)(A)).

IDENTIFICATION

Section 725(2) of the McKinney-Vento Act defines “homeless children and youths” as individuals who lack a fixed, regular, and adequate nighttime residence. The term includes—

- Children and youths who are:
 - sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason (sometimes referred to as “doubled-up”);
 - living in motels, hotels, trailer parks, or camping grounds due to lack of alternative adequate accommodations;
 - living in emergency or transitional shelters; or
 - abandoned in hospitals;
- 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;
- Children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and
- Migratory children who qualify as homeless because they are living in circumstances described above.

The first category may include some individuals who have moved in with others, and consideration of each individual case, along with the permanency of the situation, will probably be needed in order to identify those who are homeless.

The inclusion of substandard housing in the definition of homeless children and youths has caused some confusion because standards for adequate housing may vary by locality. In determining whether a child or youth is living in “substandard housing,” an LEA may consider whether the setting in which the family, child, or youth is living lacks one of the fundamental utilities such as water, electricity, or heat; is infested with vermin or mold; lacks a basic functional part such as a working kitchen or a working toilet; or may present unreasonable dangers to adults, children, or persons with disabilities. Each city, county, or State may have its own housing codes that further define the kind of housing that may be deemed substandard.

The U.S. Department of Education issued non-regulatory guidance, which included the following:

- The McKinney-Vento Act no longer includes children and youths who are awaiting foster care placement in the definition of “homeless children and youths.” For Missouri, this change is effective on December 10, 2016. This means that after the effective date, children who are awaiting foster care placement will no longer be considered homeless and will therefore not be eligible for McKinney-Vento services unless they meet the revised definition of “homeless children and youths.”
- Children who are runaways should be considered homeless even if their parents have provided or are willing to provide a home for them.
- Children who are “throwaway children” should be considered homeless until a fixed, regular, and adequate residence is established for them.
- All abandoned children are homeless until a fixed, regular, and adequate residence is established.
- Children who live with friends or relatives because of loss of housing or other similar situation should be considered homeless.
- Children living in “doubled up” families may be considered homeless if the family is doubled up or tripled up because of loss of housing or a similar situation.
- School aged, unwed mothers or mother-to-be who resides in a home for unwed mothers should be considered homeless if they have no other available living accommodations.
- Migrant children should not be considered homeless unless they meet the definition in the McKinney Act.

STUDENT PRIVACY AND SOCIAL SECURITY NUMBERS

Refer to page 45 for information regarding these guidelines.

SCHOOL ASSIGNMENT OF HOMELESS CHILDREN AND YOUTH

Homeless children and youths frequently move, and maintaining a stable school environment is critical to their success in school. To ensure this stability, LEAs must make school placement determinations on the basis of the “best interest” of the homeless child or youth based on student-centered factors. (Section 722(g)(3)(B)). Using this standard, an LEA must –

- (a) Continue the child’s or youth’s education in the school of origin for the duration of homelessness when a family becomes homeless between academic years or during an academic year; and for the remainder of the academic year even if the child or youth becomes permanently housed during an academic year; or
- (b) Enroll the child or youth in any public school that non-homeless students who live in the attendance area in which the child or youth is actually living are eligible to attend. (Section 722(g)(3)(A)).

In determining a child’s or youth’s best interest, an LEA must presume that keeping the homeless child or youth in the school of origin is in the child’s or youth’s best interest, except when doing so is contrary to the request of the child’s or youth’s parent or guardian, or in the case of an unaccompanied youth, the youth. (Section 722(g)(3)(B)(i)). When determining a child’s or youth’s best interest, an LEA must consider student-centered factors, including factors related to the impact of mobility on achievement, education, health, and safety of homeless children and youths, giving priority to the request of the child’s or youth’s parent or guardian or (in the case of an unaccompanied youth) the youth. (Section 722(g)(3)(B)(ii)). We encourage an LEA to also consider the school placement of siblings when making this determination.

If, after conducting the best interest determination and considering student-centered factors, the LEA determines that it is not in the child’s or youth’s best interest to attend the school of origin or school requested by the parent or guardian, or (in the case of an unaccompanied youth) the youth, the LEA must provide the child’s or youth’s parent or guardian or the unaccompanied youth with a written explanation of the reasons for its determination, in a manner and form understandable to such parent, guardian, or unaccompanied youth. (Section 722(g)(3)(B)(iii)). This written explanation must also include information regarding the right to appeal (Section 722(g)(3)(B)(iii); *see also* 722(g)(3)(E)(ii)) and should be provided in a timely manner.

The LEA has an ongoing obligation to remove barriers to the enrollment and retention of homeless children and youths. (*See* sections 721(2), 722(g)(1)(I)). A school selected on the basis of a best interest determination must **immediately** enroll the homeless child or youth, even if the child or youth is unable to produce the records normally required for enrollment (such as previous academic records, records of immunization and other required health records, proof of residency, proof of guardianship, birth certificates, or other documentation), has missed application or enrollment deadlines during a period of homelessness, or has outstanding fees. (Section 722(g)(3)(C)(i); *see also* 722(g)(1)(H)). The enrolling school must also immediately contact the school last attended by the child or youth to obtain relevant academic or other records. (Section 722(g)(3)(C)(ii)). In addition, an LEA should ensure that homeless students are attending classes and participating fully in school activities immediately upon the student being identified as eligible for McKinney-Vento rights and services.

If a child or youth needs to obtain immunizations or other required health records, the enrolling school must immediately refer the parent, guardian, or unaccompanied youth to the local liaison, who must assist in obtaining the immunizations, screenings, or immunization or other required health records. (Section 722(g)(3)(C)(iii)). Any records ordinarily kept by the school—including immunization or other required health records, academic records, birth certificates, guardianship records, and evaluations for special services or programs—must be maintained so that they are available in a timely fashion when the child enters a new

school or school district. (Section 722(g)(3)(D)(i)). To facilitate immediate enrollment, timely transfer of records from school to school should also take into account procedures for inter-State record transfers.

LEAs must have procedures to ensure that homeless children and youths who meet the relevant eligibility criteria do not face barriers to accessing academic and extracurricular activities, including magnet school, summer school, career and technical education, advanced placement, online learning, and charter school programs, if such programs are available at the State or local levels. (Section 722(g)(1)(F)(iii)). Additionally, outstanding fines or fees or absences must not present barriers to enrollment for homeless students. (*See* section 722(g)(1)(I)). LEAs should anticipate and accommodate the needs of McKinney-Vento-eligible students to enter charter schools, magnet schools, and other schools, programs, and activities despite missing application and enrollment deadlines due to a period of homelessness. In addition, LEAs should consider giving homeless children and youths priority if there is a waitlist for these schools, programs, and activities. Local liaisons must assist homeless children and youths with activities such as enrolling in school and accessing school services, including free meals through the U.S. Department of Agriculture's (USDA's) National School Lunch Program and School Breakfast Program.

PLACEMENT IN APPROPRIATE LEVEL OF INSTRUCTION

Placing a student at the appropriate class level or level of instruction when he/she enters school is always a challenge; however, it is a special challenge for a child with no records from the school(s) previously attended. In such situations for homeless children and youth, school personnel are urged to do a quick, appropriate assessment of the child's strengths, weaknesses, and achievements and then make the best possible temporary placement until more information is available. If records are not received in ten or more school days, the State Homeless Coordinator may be contacted for assistance in resolving the matter.

TESTING

Homeless students should be tested as quickly as possible when the need becomes apparent for such testing. Districts are encouraged, however, to obtain all relevant information about prior testing to avoid duplication. Possible methods of obtaining this information include phone contact with the school principal or the Homeless Liaison in the previous district, interviews with the parents and/or student, and review of any available records, which may indicate test results. Other valuable information can be obtained quickly through informal assessment procedures, including interviews, oral readings, and other techniques used by school counselors, special education teachers, and Title I teachers.

IMMUNIZATION RECORDS

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. According to McKinney-Vento, the student must be enrolled in the interim. If the Homeless Liaison is unable to obtain prior immunization records within thirty (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 § 167.181, RSMo. See <http://www.moga.mo.gov/>.

PROVIDING COMPARABLE SERVICES IN REGULAR PROGRAMS

Because of the temporary nature of their school enrollment, homeless students are often denied access to programs available to other students. Homeless students should be given the opportunity to participate in all available school programs. These programs may include, but are not limited to, transportation services, counseling programs, elective classes, incentive grant programs, fine arts classes, and industrial/vocational classes, gifted/talented programs, and school nutrition programs.

In the case of a homeless student who is a member of a minority group, Title VI of the Civil Rights Act of 1964 provides that these students may not be discriminated against in the assignment to schools, classes, programs, or activities. The McKinney-Vento Act provides that homeless students may not be isolated or stigmatized because of their homelessness.

PROVIDING COMPARABLE SERVICES IN SPECIAL PROGRAMS

Children who suffer the effects of homelessness are often moved from town to town and school to school. As a result of the rapidly changing and transient lifestyle imposed upon them, these children may not receive the special services to which they are entitled, or for which they have great need. The McKinney-Vento Act requires that homeless children are entitled to these comparable services regardless of the permanency of their residence in the district. These services include programs for children with disabilities and educational programs for students with limited English proficiency.

TRANSPORTING HOMELESS CHILDREN

The McKinney-Vento Act not only requires an LEA to provide comparable services, including transportation services, to homeless students (Section 722(g)(4)(A)), but it also requires an LEA, at the request of a parent or guardian, to provide or arrange for transportation to and from the school of origin (Section 722 (g)(1)(J)(iii)).

An LEA receiving McKinney-Vento subgrant funds may use these funds to defray the excess cost of school of origin transportation as (up to 35% of grant funding). An LEA may also use Title I, Part A funds reserved in homeless set-aside to defray the excess costs of transporting homeless students to and from their school of origin. (ESEA section 1113(c)(3)(C)(ii)(II)).

The excess cost is the difference between what an LEA normally spends to transport a student to school and the cost of transporting a homeless student to school. If the LEA provides transportation through a regular bus route, there is no excess cost. If the LEA provides special transportation only for the homeless student (e.g., through a private vehicle or transportation company), the entire cost can be considered excess. If the LEA must re-route busses to transport a homeless student enrolled in one of its schools, the additional cost of this rerouting can be considered excess cost.

INTRA-DISTRICT TRANSPORTATION

The attendance center is assigned by local school district officials for each pupil residing within its boundaries. If a student becomes homeless during the school year and temporarily resides in a different attendance area, the parent, guardian, or unaccompanied youth and the district Homeless Liaison should decide whether or not it is in the student's best interest to remain at the school of origin. Local district policy determines at what distance (less than 3 ½ miles) the school district will provide transportation for its pupils. Therefore, depending upon each local district's policy, transportation may be provided and state aid claimed for transporting the homeless student to and from the school of origin.

State transportation aid can be claimed and paid on all pupils living one (1) mile or greater from their assigned attendance center.

Pupils living less than one (1) mile from their assigned attendance center may be transported by the district; however, no state aid can be claimed for these pupils.

INTER-DISTRICT TRANSPORTATION

When the school of origin is in a LEA different from the one in which the homeless student is temporarily residing and a determination is made that the student should remain at the school of origin, transportation may be provided. An agreement may exist between the resident school district and the school district in which the school of origin is located, for the intention of transporting the homeless student.

Both districts must equally split the cost of transporting a homeless student to the school of origin, or if the school of origin is not determined to be in the best interest of the child, to the school of best interest.

The resident school district may claim state aid for providing transportation through a variety of options:

- A. the resident school district may provide the transportation;
- B. the resident school district may contract with the school district of attendance to have it provide the transportation; or
- C. the resident district may contract with a school bus contractor, taxi cab company, homeless shelter, or an individual with the proper license/permit to provide the transportation to and from the assigned attendance center.

Refer to the School Transportation Administrator's Handbook for guidance concerning pupil transportation in vehicles other than school buses. The Handbook is available on line at:

<https://dese.mo.gov/sites/default/files/sf-AdminHandbook1314.pdf>

Also, refer to the National Center for Homeless Education's McKinney-Vento Law Into Practice Brief: *Transporting Children and Youth Experiencing Homelessness*. Available on line at:

<http://center.serve.org/nche/downloads/briefs/transportation.pdf>

TRANSPORTATION AND EXTRACURRICULAR ACTIVITIES

SEAs and LEAs have a broad, ongoing requirement to review policies or practices that may act as barriers to, among other things, the enrollment of homeless children and youths. (*See, e.g.*, sections 721, 722(g)(1)(I)). Enrollment includes attending classes and "participating fully in school activities." (Section 725(1)). The McKinney-Vento Act further emphasizes that homeless students must not face barriers to accessing extracurricular activities. (*See* section 722(g)(1)(F)(iii)). **Therefore, to the extent that lack of access to transportation is a barrier to extracurricular activities for a particular student, an LEA would be required to provide this student with transportation to or from extracurricular activities.**

HOMELESS STATE SCHOOL TRANSPORTATION

When a homeless student attends a state school, the school district where the student resides and the school district where the state school is, will split the excess cost of transporting the homeless student to the state school.

CLAIMING STATE TRANSPORTATION AID

The transportation of a homeless student will be treated and reimbursed at the same rate as all other pupil transportation expenditures. The resident district must have route miles on its Route Approval Report submitted to the local board of education for approval and on the Application for State Transportation Aid (as with any other route mileage); and the expenditures must be reported on the Annual Secretary of the Board Report in an appropriate transportation line.

TIPS FOR SUPPORTING THE TRANSPORTATION OF HOMELESS CHILDREN AND YOUTHS

Transportation has been reported as one of the main barriers to the education of homeless children and youths; thus, coordination between staff is crucial. Below are some tips for effectively implementing this requirement.

- Convene a meeting of local liaisons and transportation directors to establish a plan that may be immediately implemented when transportation is needed for a homeless child or youth. Addressing issues of cost, responsibility, and logistics before the need occurs will prevent delays in a homeless student's school attendance.
- Use technology, such as a transportation database, to make electronic transportation requests, maintain current records of homeless students receiving transportation, and determine what specialized bus routes have been established.
- Develop forms, such as homeless student transportation requests, parent agreements, and inter-district transportation agreements that may be accessed easily at any school or online.
- Explore flexible bus routes that can be implemented easily. Maintain a list of shelters, hotels, motels, campgrounds, and other areas where homeless families may live so that these locations can be included in bus routes on short notice, recognizing that establishing a stop directly in front of these locations can stigmatize students.
- Be aware that students in homeless families and unaccompanied homeless youths move frequently and that transportation plans must be adjusted accordingly. Encourage families and youths to inform the local liaison when they are moving.
- Identify a transportation staff member who will serve as the point person to arrange transportation for homeless students.
- Train bus drivers and dispatchers on the rights and needs of homeless students, as well as on the need for sensitivity and confidentiality.
- Be mindful of State and local policies for pupil transportation safety. The McKinney-Vento Act does not override safety policies.
- Consider economical approaches to providing transportation. Brainstorm cost-saving solutions with LEA and community stakeholders.

STAFF DEVELOPMENT FOR TEACHERS

Professional development activities should be provided for school personnel that are designed to heighten their sensitivity to the needs of homeless children and youth, the rights of such children and youth, and the specific educational needs of runaway and homeless youth. Homeless children and youth must not be isolated or stigmatized, and teachers and other school personnel must feel comfortable working with them and their families if they are to make them feel safe and welcome in the school. A LEA may provide their staff with professional development activities provided by knowledgeable shelter personnel or staff from other school districts.

Areas in which school districts and local liaisons may need technical assistance include:

- Understanding the requirements of the McKinney-Vento Act;
- Establishing procedures to address problems related to school enrollment and selection;
- Establishing procedures to ensure homeless children and youth receive full and partial credit for work completed;
- Arranging transportation, including across district and State lines;
- Resolving disputes in an efficient and effective manner;
- Determining LEA needs and developing a plan for services;
- Creating school district and community awareness of the needs of eligible students;
- Identifying Federal, State, and local resources;
- Identifying homeless children and youths;
- Monitoring attendance, chronic absenteeism, dropout rates, suspensions, and expulsions among homeless children and youths;
- Collecting and reporting data;
- Enhancing parental involvement activities; and
- Identifying strategies for improving academic achievement.

TITLE I

Homeless children and youths are automatically eligible for services under Title I, Part A of the ESEA, whether or not they live in a Title I school attendance area or meet the academic standards required of other children for eligibility. (ESEA section 1115(c)(2)(E)). For example, homeless children and youths may receive Title I educational or support services from schoolwide and targeted assistance school programs.

A homeless child or youth who becomes permanently housed during a school year continues to remain eligible for Title I, Part A services for the remainder of that school year. This helps ensure school stability for formerly homeless children. For example, it may be appropriate in certain circumstances for an LEA to use Title I, Part A funds to transport formerly homeless students to or from their school of origin for the remainder of the school year in which they become permanently housed.

Title I, Part A funds may be used to provide a wide variety of services to homeless students. In addition to providing services to assist homeless students in meeting the State's challenging academic standards, Title I, Part A funds may be used to provide services to homeless children and youths, including those in Title I schools, that may not ordinarily be provided to other Title I students. (ESEA section 1113(c)(3)(C)(ii)). For example, to help homeless students effectively take advantage of educational opportunities, an LEA may use Title I, Part A funds to provide, where appropriate, items or services including, but not limited to:

- Items of clothing, particularly if necessary to meet a school's dress or uniform requirement;
- Clothing and shoes necessary to participate in physical education classes;
- Student fees that are necessary to participate in the general education program;
- Personal school supplies such as backpacks and notebooks;
- Birth certificates necessary to enroll in school;
- Immunizations;
- Food; (in a school setting)
- Medical and dental services;
- Eyeglasses and hearing aids;

- Counseling services to address anxiety related to homelessness that is impeding learning;
- Outreach services to students living in shelters, motels, and other temporary residences;
- Extended learning time (before and after school, Saturday classes, summer school) to compensate for lack of quiet time for homework in shelters or other overcrowded living conditions;
- Tutoring services, especially in shelters or other locations where homeless students live;
- Parental involvement specifically oriented to reaching out to parents of homeless students;
- Fees for AP and IB testing;
- Fees for college entrance exams such as SAT or ACT; and
- GED testing for school-age students.

Two principles govern the use of Title I, Part A funds to provide such services to homeless students. First, the services must be reasonable and necessary to assist homeless students to take advantage of educational opportunities. (ESEA section 1113(c)(3)(A); 2 CFR § 200.403(a)). Second, Title I, Part A funds must be used only as a last resort when funds or services are not available from other public or private sources, such as the USDA's National School Lunch Program and Breakfast Program, public health clinics, or local discretionary funds (sometimes provided by the PTA) used to provide similar services for economically disadvantaged students generally. (*See* ESEA section 1115(e)(2)).

Under section 1113(c)(3)(A) of the ESEA, an LEA must reserve sufficient Title I funds to provide services to homeless students who attend non-Title I schools that are comparable to those provided to students in Title I schools.

These services may include providing educationally related support services to children in shelters and other locations where homeless children live. Services should be provided to assist homeless students to effectively take advantage of educational opportunities. In addition to serving homeless children and youths who attend non-Title I schools, the homeless set-aside may be used to provide services to homeless students in Title I schools that are not ordinarily provided to other Title I students.

Determining the Title I Set-Aside

Funds reserved for comparable services under section 1113(c)(3)(A)(i) of the ESEA may be determined based on a needs assessment of homeless children and youths in the LEA, taking into consideration the number of homeless children and youths identified by the LEA and their unique needs. This needs assessment may be the same as the needs assessment conducted by the LEA in applying for local McKinney-Vento subgrant funds. (ESEA section 1113(c)(3)(C)(i)).

One method for the LEA needs assessment is to look at homeless student enrollment averages or trends in the district over a two- or three-year period and the average per-pupil cost of providing Title I-funded services in the current fiscal year and multiplying those two numbers. However, the needs of homeless children and youths that affect their enrollment, attendance, and success in school can be unique and distinct from housed students and should be reviewed periodically and regularly, at least more than once per school year. Other factors to consider are the presence of other State and Federal education grants that can provide the same or similar services as well as other community resources; these also change annually or regularly. Finally, the LEA should consider what is necessary and reasonable for each student to fulfill the purposes of the Title I and McKinney-Vento programs in their district, as well as the effectiveness of past activities in accomplishing the goals of those programs for individual students as well as the overall programs.

Under section 1112(b)(6) of the ESEA, an LEA must describe in its Title I, Part A plan the services it will provide homeless children and youths, including services provided with funds reserved under section 1113(c)(3)(A) of the ESEA, to support the enrollment, attendance, and success of these children and youths. An LEA's Title I, Part A application also should include a description of the method used for determining the amount reserved, whether by a needs assessment or some other method (e.g., past homeless student enrollment and support service cost data), and how the liaison was consulted or involved in determining the set-aside.

Tips for Facilitating Collaboration Between Title I and McKinney-Vento Act Programs

The Title I, Part A program is a significant Federal education resource for the education of homeless children and youths. Therefore, effective coordination between these two programs (given the requirements in both programs to serve homeless children and youths) can have substantive impacts on many homeless students. Consider the following recommendations for facilitating stronger collaboration:

- Ensuring that LEA local liaisons attend Title I conferences and in-service days and that Title I Coordinators attend homeless education conferences and in-service professional development days;
- Encouraging local Title I Coordinators and LEA local Liaison to work together to develop and implement a plan that identifies ways that Title I funds and programs will serve children and youths experiencing homelessness;
- Collecting and sharing within and across districts concrete data on the needs of homeless children and youths;
- Leading district-wide efforts to make organizational accommodations for eligible students, as necessary, in such areas as transportation, remaining in the school of origin, records transfer, class scheduling, and special services that will help them enroll, attend, and succeed in school;
- Ensuring that the needs of highly mobile students are included in the school improvement plans and not addressed as a separate issue;
- Establishing and widely disseminating information on district-wide policies, procedures, and guidelines to identify and serve eligible students;
- Including homeless parents in Title I parental involvement policies and creating opportunities for homeless parents to be involved.

May Title I, Part A funds reserved under section 1113(c)(3)(A) of the ESEA be used to fund the local liaison position?

Yes. Title I, Part A homeless set-aside funds may be used to fund all or part of the Homeless Liaison's salary even if that person has no Title I duties. (ESEA section 1113(c)(3)(C)(ii)(II)). In larger districts with significant numbers of identified homeless students enrolled, an LEA may also use Title I funds to support, as necessary, additional staff carrying out the required duties of the local liaison.

Title I of the Elementary and Secondary Education Act (ESEA) targets those students most at risk of failing in school. Among students at risk of school failure are children and youth experiencing homelessness.

Homeless children and youth often face unique barriers when accessing educational programs and striving for academic success, ensuring that these students receive “comparable” services may require additional programming that is not provided to other Title I students. For instance, Title I, Part A, states that it is appropriate to provide educationally-related support services, such as tutoring, to children at shelters or other places where homeless children may live, such as motels. [20 USC 6313(c)(3)(A)]. In addition, Guidance from the U.S. Department of Education states that LEAs may use reserved funds to provide homeless students with services that are not ordinarily provided to other Title I students and that are not available from other sources. The guidance offers an example of using reserved funds to provide clothing to meet a school's dress

or uniform requirements. Hence, in determining appropriate expenditures for the funds set-aside for homeless students, it is important to note that *comparable* services do not mean services that are necessarily *identical* to other Title I, Part A, services.

In addition to serving homeless students not enrolled in Title I schools, U.S. Department of Education Guidance states that set-asides also can be used to provide services to homeless students who *are* attending Title I schools. In determining the set-aside amount, LEAs should allow for the provision of services to homeless students who attend Title I schools that will meet the unique needs of these children above and beyond the regular Title I programs at those schools, as well as for the provision of services to homeless students who do not attend Title I schools.

SUGGESTIONS FOR SERVICES

After assessing the needs of homeless students, the Homeless Liaison and Title I Coordinator, along with other district-level administrators, may consider funding the following:

- Before-school, after-school, and/or summer programs
- Outreach services to students living in shelters, motels, and other temporary residences to help identify homeless children and youth and advise them of available school programming
- Basic needs such as clothing, uniforms, school supplies, and health-related needs
- Counseling services
- The hiring of teachers, aides, and tutors to provide supplemental instruction to students whose achievement is below grade level
- The work of the local liaison
- Parental involvement programs that make a special effort to reach out to parents in homeless situations
- Research-based programs that benefit highly mobile students
- Data collection to assess the needs and progress of homeless and other highly mobile students

MANDATORY RESERVATIONS OF FUNDS

Section 1113(c) (3) (A) states, “A local educational agency shall reserve such funds as necessary under this part to provide services comparable to those provided to children in schools funded under this part to serve homeless children who do not attend participating schools, including providing educationally related support services to children in shelters and other locations where children may live.”

The LEA must set-aside funds for services to homeless children on Step 3 of the Title I Breakdown of Allocation form. School districts must establish their own methods for allocating Title I, Part A, set-asides for homeless children and youth who are not attending Title I schools. Generally, these methods involve conducting a needs assessment for homeless students in the school district or basing the set-aside amount on a formula, such as a per pupil expenditure. Determining an appropriate amount requires coordination between the Title I Coordinator and Homeless Liaison.

Below are some methods that may be used to calculate your Title I, Part A, set-aside:

Method #1 Reserve the set-aside amount on what you would be eligible for if you were applying for a McKinney-Vento subgrant. In Missouri, the competitive McKinney-Vento Homeless application allows school districts to apply for funding based on the number of homeless children and youth being educated in the district up to a maximum level of \$400 per homeless child. **If your district has not identify any**

homeless children and youth, a minimum of \$400 should be set-aside in case a homeless student should arrive in your district.

Method #2 Reserve the set-aside amount based on a percentage. A specific percentage of funds for homeless children and youth can be reserved based on your Title I, Part A allocation, or on your district's poverty data. Generally, if you have a higher poverty percentage, you will have a higher number of homeless children and youth.

Method #3 Reserve the set-aside amount based on your homeless student count and Title I, Part A per-pupil allocation. To reserve funds by using this method you will need to take your homeless children and youth count multiplied by your Title I, Part per-pupil allocation.

Method #4 Reserve the set-aside amount based on homeless student's needs. Based on your district's prior years expenses related to fulfilling the requirements set out in Section 722(g)(6) of McKinney-Vento, set-aside an amount that will allow you to provide appropriate services.

Method #5 Reserve based on free/reduced lunch count. Statistically, 10% of children living in poverty will experience homelessness within any given year.* Using your free/reduced lunch count, you could estimate the number of students in your district that may experience homelessness during the school year. For example:

Your free/reduced lunch count =100 students
10% of whom could become homeless =10 students
Your Title IA per pupil allocation is \$869 per student

Using this method, your Title IA Homeless set-aside would be: \$8,690.00

*Burt, Martha and Laudan, Aron. *American's Homeless II: Populations and Services*, The Urban Institute, 2000.

Your district should indicate the method that you have chosen to set-aside an amount for homeless children and youth, under the Comments Section of Step 3, Breakdown of Allocation.

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Appendix A

DIRECTIONS FOR COMPLETION OF THE FEDERAL PROGRAMS APPLICATION FOR THE MCKINNEY-VENTO HOMELESS CHILDREN AND YOUTH GRANT

LEAs may apply for funding based on the number of homeless children and youth being educated in the LEA up to a maximum level at \$400 per homeless child. The minimum grant award is \$8,000 (20 students). The maximum amount any LEA may apply for is \$150,000 (375+ students) regardless of the number of homeless children and youth being educated in the LEA.

Applicants may submit grant applications via email, hand delivery, or by mail by the deadline date of 4:00 p.m. **Friday, June 23, 2017**. LEAs may choose to submit an electronic PDF grant application via email to donna.cash@dese.mo.gov or hand deliver a grant application to the 7th floor of the Jefferson State Office Building located at 205 Jefferson Street, Jefferson City, Missouri or they may choose to submit their grant by mail postmarked no later than the deadline to the following address:

Federal Programs, McKinney-Vento Homeless Children and Youth Grant Application
Department of Elementary and Secondary Education
7th Floor, 205 Jefferson Street, PO Box 480
Jefferson City, MO 65102-0480

Narratives cannot exceed page limits and must be typed in Times New Roman 12 point font, double-spaced with 1 inch margins.

SECTION I - TOTAL BUDGETS BY PROGRAM—Year 1

The total budget for year 1 of the homeless grant must be completed and shown in the grid on page one. The codes on the left side of the budget grid are function codes. Function code descriptions mean the action or purpose for which a person or thing is used or exists. Function includes the activities or actions which are performed to accomplish the objective of the school district. For further information on function codes, consult the School Finances' Missouri Financial Accounting Manual. <https://dese.mo.gov/financial-admin-services/school-finance/accounting-manual>

SECTION II – LOCAL EDUCATION AGENCY AND PROGRAM INFORMATION

List the name of the LEA, the board-authorized representative, and the grant contact information. The grant contact should be someone who knows the grant well and will be in daily contact with the project staff.

SECTION II – continued - ASSURANCES AND CERTIFICATION

Original signature of the superintendent or authorized representative guarantees means that all assurances will be met. Applications not signed, are considered non-responsive and will not be scored.

SECTION III – PROGRAM STATUS

LEA level information can be located in the Missouri Comprehensive Data System under District Information

- Student Enrollment: (School District Report Card)
- Free and Reduced Lunch Percentage: (School District Report Card)
- Dropout Rate: (School District Report Card)
- Homeless Children and Youth Count conducted by the District on the total number of homeless children and youth served on any one day **OR** by the total number of homeless children and youth served during the entire previous school year **OR** the results of DESE's (June Core Data) as required by federal legislation.
- USDA County Poverty Percentage for 2015:

SECTION IV – PROGRAM DESCRIPTION NARRATIVE

Narratives cannot exceed 8 pages and must be typed in Times New Roman 12 point font, double-spaced with 1 inch margins. The program description narrative should provide the following information:

1. How the grant is consistent with the purpose of and encompasses all aspects of the McKinney-Vento Homeless Assistance Act.
2. How the services and programs funded by this grant will address the needs identified by the local education agency's assessments and how these are linked to the needs, objectives, activities, and outcomes of the program.
3. The programs activities as they are proposed in the grant.
4. How the proposed activities do not replace the regular academic program but instead, expand upon or improve services provided to homeless students as part of the school's regular academic program.
5. How the program will be staffed and managed. Also describe how the local education agency coordinates with other service providers/agencies; including, but not limited to Title I.A., Migrant, English Language Learners (ELL), and Preschool programs.
6. Current policies and procedures that exist or will be implemented to eliminate the stigmatization or isolation of homeless children and youth.

SECTION V – GRANT NEEDS ASSESSMENT NARRATIVE

Narratives cannot exceed 6 pages and must be typed in Times New Roman 12 point font, double-spaced with 1 inch margins. The program status and statement of need assessment narrative should include:

- Current status of the Local Education Agency's Homeless program; including,
 - socio-economic and demographic data and trends.
- Available resources; including:
 - program coordination (Title I, Special Education, community resources, etc.)
 - outreach programs,
 - Local Education Agency support and federal program supports are in place, and
 - percentage of time that the local liaison and others devote to homeless education.
- Identification of major needs of homeless children and youth in the Local Education Agency that will be addressed with this grant.
 - identify program development and planning (include the Local Education Agency's current needs assessment).

SECTION VI – COLLABORATION DESCRIPTION

Title I and McKinney-Vento Homeless Education Coordination (Grant Requirement) page 4
Narratives should be limited to the space provided on the application.

Provide a description of:

1. The actual set-aside for SY 2016-17 and the activities funded.
2. Planned set-asides for year 1 through year 3 of the grant and the activities being planned.
3. Describe what percentage of the 2016-17 Title I set-asides were spent on homeless children and youth. If this is less than 100%, explain why those funds were not expended.

SECTION VI – COLLABORATION DESCRIPTION (continued)

Title I and McKinney-Vento Homeless Education Coordination (Grant Requirement page 5)
Narratives should be limited to the space provided on the application.

Provide a description of:

1. The process used to determine the amount of the Title I Homeless set-aside.
2. How are ongoing collaborations between Title I and the McKinney-Vento staff conducted?

SECTION VI – COLLABORATION DESCRIPTION (continued)

Collaborations within the Local Education Agency (Grant Requirement page 6)

Narratives should be limited to the space provided on the application.

Describe the collaboration between the departments, the activities conducted, and those that are or were planned, and who provided those services or resources.

SECTION VI – COLLABORATION DESCRIPTION (continued)

Collaborations in the Community (Grant Requirement page 7)

Narratives should be limited to the space provided on the application.

Describe the collaboration between the agencies and the LEA, the activities conducted, and those that are or were planned, and who provided those services or resources.

SECTION VII A. – PROGRAM EVALUATION NARRATIVE

Narratives cannot exceed 7 pages and must be typed in Times New Roman 12 point font, double-spaced with 1 inch margins. (Narrative page 8) The program evaluation narrative should provide a description of:

1. How the grant activities will be monitored and how feedback will be obtained for decision-making through the life of the grant.
2. How feedback data will be used for guiding the grant's process during the term of the grant.
3. The criteria used to judge the success of the grant.
4. The methods of evaluation used for this grant and how activities differ from year one to year three for this grant.

SECTION VII B. – OBJECTIVES, ACTIVITIES, AND DATA SOURCES

MINIMUM OF 3 AND MAXIMUM OF 6 OBJECTIVES (pages 8 through 13)

Objectives could be for all three years or for an individual year. **Narratives should be limited to the space provide on the application. A narrative should be included for each of the objectives as outlined in the grant.** Describe the objective and the year of the grant if applies to. Also describe the activities. Provide a description of how the activities will achieve the objective, the number of homeless students impacted by the objectives and the time frame of the activity. Describe the measurable outcomes and the data sources the LEA will use to measure their outcomes.

SECTION VIII – PROGRAM SUPPORTING DATA PAGE

Indicates the positions funded with McKinney-Vento subgrant monies and the required certification (if any) for those positions. All federally-funded positions, whether certified or non-certified, are to be reported. All positions are to be reported according to the duties actually performed by staff person(s). Reported positions should not be different from what would be observed on site during a review or monitoring. For more information on federal programs' position coding, please refer to Exhibit 15 of the Core Data Manual.

SECTION IX– A. – HOMELESS CHILDREN AND YOUTH PROGRAM ACTIVITY BUDGET

Year 1 (page 15)

Complete these sections to indicate total costs of implementing all activities. Provide a brief itemization of the line item and its cost. Each cost area must be subtotaled and then a grand total given. For examples, see Administrative Manual, page 11.

These totals (from year 1) must be copied to *Section I - Total Budgets By Program*.

Example: Program total funds should be transferred to *Section I - Total Budgets By Program*.

SECTION I - TOTAL BUDGETS BY PROGRAM								
PROGRAM: Homeless Children and Youth	6100 Certified Salaries	6150 Non- Certificated Salaries	6200 Employee Benefits	6300 Purchased Services	6400 Materials Supplies	6500 Capital Outlay	6600 Other	TOTAL

The Homeless Children and Youth Grant Program allows for indirect cost. **Administrative costs and indirect costs combined cannot exceed 5 percent** of the district’s total proposed budget. If indirect cost is applied, the district’s restricted rate must be used. Indirect costs are calculated by multiplying total direct costs (less costs for capital outlay and interest) by the approved school district restricted indirect cost rate.

SECTION IX– B. – HOMELESS CHILDREN AND YOUTH PROGRAM ADMINISTRATIVE COSTS Year 1 (page 16)

Complete this section to indicate the program’s administrative costs. **Administrative costs and indirect costs combined cannot exceed 5 percent of the district’s total proposed budget.** Provide a brief itemization of the line item and its cost. Each cost area must be subtotaled and then a grand total given.

SECTION IX– A. – HOMELESS CHILDREN AND YOUTH PROGRAM ACTIVITY BUDGET Year 2 (page 17)

The Homeless Children and Youth Grant Program is now a three year grant program. This section is the “proposed” budget for year two. Final budget allocations will be determined in July 2018. A finalized budget will be due at that time and is contingent on Federal funding to the SEA.

SECTION XI-B. – PROPOSED HOMELESS CHILDREN & YOUTH PROGRAM ADMINISTRATIVE COSTS Year 2 (page 18)

The Homeless Children and Youth Grant Program is now a three year grant program. This section is the “proposed” budget for year two. Final budget allocations will be determined in July 2018. A finalized budget will be due at that time and is contingent on Federal funding to the SEA.

SECTION IX– A. – HOMELESS CHILDREN AND YOUTH PROGRAM ACTIVITY BUDGET Year 3 (page 19)

The Homeless Children and Youth Grant Program is now a three year grant program. This section is the “proposed” budget for year three. Final budget allocations will be determined in July 2019. A finalized budget will be due at that time and is contingent on Federal funding to the SEA.

SECTION XI-B. – PROPOSED HOMELESS CHILDREN & YOUTH PROGRAM
ADMINISTRATIVE COSTS Year 3 (page 20)

The Homeless Children and Youth Grant Program is now a three year grant program. This section is the “proposed” budget for year three. Final budget allocations will be determined in July 2019. A finalized budget will be due at that time and is contingent on Federal funding to the SEA.

Donna Cash, Coordinator, McKinney-Vento Homeless Program
Missouri Department of Elementary and Secondary Education
Federal Programs
PO Box 480
Jefferson City, MO 65102-0480

Appendix B

MISSOURI FREQUENTLY ASKED QUESTIONS

Q. Where can I find the definition of homeless children or youths?

- A. The McKinney-Vento Act states children and youth who lack "a fixed, regular, and adequate nighttime residence" will be considered homeless. 42 U.S.C. §11434A(2)(A). The Act does not define those terms.

However, the following may be used as a reference:

Fixed: Securely placed or fastened; not subject to change or fluctuation. (*Merriam- Webster's Collegiate Dictionary, Tenth Edition*). A fixed residence is one that is stationary, permanent, and not subject to change.

Regular: Normal, standard; constituted, conducted, or done in conformity with established or prescribed usages, rules, or discipline; recurring, attending, or functioning at fixed or uniform intervals. (*Merriam-Webster's Collegiate Dictionary, Tenth Edition*).

Adequate: For a specific requirement; lawfully and reasonably sufficient. (*Merriam-Webster's Collegiate Dictionary, Tenth Edition*). An adequate residence is one that is sufficient for meeting both the physical and psychological needs typically met in home environments.

Section 167.020.1, RSMo, is the state statute defining Missouri's public school residency requirements and conforms to the federal definition.

<http://www.moga.mo.gov/mostatutes/stathtml/16700000201.html>

Missouri school districts should have adopted a written "Homeless Education Program" or "Admission of Homeless Students" policy or regulations which, includes this definition. Homeless Liaisons and school admissions personnel should familiarize themselves with their policy.

Section 167.020.1, RSMo, the state statute defining Missouri's public school residency requirements, conforms to the federal definition. <http://www.moga.mo.gov/mostatutes/stathtml/16700000201.html>

Most Missouri school districts have adopted a written "Homeless Education Program" or "Admission of Homeless Students" policy or regulation that includes this definition. Homeless Liaison and school admissions personnel should familiarize themselves with this policy.

Q. Are homeless children and youths subject to the same residency requirements as other students?

- A. No. Pursuant to § 167.020.6, RSMo, homelessness is an exception to the residency requirements defined in § 167.020.2 and 3, RSMo.

Q. What is meant by "immediate" enrollment?

- A. It means that a homeless student should be enrolled without undue or unreasonable delay. The goal is to ensure that the district does not create a barrier to enrollment.

Q. May a school district wait until a new semester begins to enroll a homeless child?

- A. No. The McKinney-Vento Act supersedes district practice regarding enrollment. District personnel should review their board-adopted policy regarding the enrollment of homeless students.

- Q. How does the school district determine if a student fits the definition of “awaiting foster care”?**
- A. The Department recommends contacting the Children’s Division of the Department of Social Services for assistance in making a determination as to a student’s care status.
- Q. What is Missouri’s policy on immunizations for homeless children and youths?**
- A. Once district officials have determined that an enrolling student is homeless, the district’s Homeless Liaison must assist in 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 thirty (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 § 167.181.3, RSMo. See the following website:
<http://www.moga.mo.gov/statutes/C100-199/1670000181.HTM>
- Q. If a parent is incarcerated is the child automatically considered a homeless student?**
- A. A review of the facts specific to the child should assist the district in determining whether homelessness is a consequence of the incarceration. It may depend on the immediacy and longevity of the parent’s incarceration; it may also depend on who has custody of the child during the parent’s incarceration and/or whether the student is residing in a fixed, regular, and adequate nighttime residence during the incarceration. If the child isn’t identified as homeless, s/he may be residing in the district as the result of hardship or good cause.
- Q. If a Homeless Liaison suspects that a “homeless” child is not truly homeless, how would the district prove that a person is not homeless?**
- A. McKinney-Vento requires homeless children to be enrolled immediately even if the student can’t provide education records. Until the district determines otherwise, the student should be enrolled. Most school districts have a standard enrollment/registration form and/or a proof of residency waiver form that should provide the Homeless Liaison enough information to make a determination as to the student’s homeless status. If not, the Liaison can continue to monitor the child’s status throughout the school year if the form doesn’t provide enough information for the Liaison to initially make an informed decision.
- Q. At what age can districts begin using grant funds to serve homeless children and youths? Do they need to only serve school-aged children as our state defines it?**
- A. McKinney-Vento addresses the needs of homeless children and youths from pre-school through grade 12 and requires comparable services for enrollment in preschool programs for which non-homeless preschool students are eligible. Therefore, a school district that operates a pre-school program in one or more schools should be providing comparable services for children who are homeless. School districts wanting to use grant funds for preschool may do so only for students who meet the age requirements of the district preschool program.
- Q. Does our school district need to provide transportation for detention?**
- A. A homeless student receiving an after-school detention would be treated comparably to other students who have been detained after school. In some cases, that may mean the school provides after hours transportation.

- Q. May school districts use transportation funds to transport a 19 year-old from a shelter to take GED classes? The student is not enrolled in the school district at this time.**
- A. The use of federal funds would not be appropriate for this purpose since the student is not enrolled in high school. On the other hand, a homeless student participating in a district’s GED Option Program would still be eligible for transportation since the student remains enrolled in high school.
- Q. Are school districts required to provide transportation to alternative schools for homeless students?**
- A. If the student is assigned to an alternative school by the district, then transportation must be provided to the school.
- Q. Are school districts required to provide transportation during summer school for homeless children and youth?**
- A. Transportation during summer school is only required when it is provided to non-homeless students. Transportation should be provided if summer school is required for the homeless student to advance to the next grade.
- Q. Once a homeless child is permanently housed are districts required to provide transportation for the remainder of the school year?**
- A. For the sake of educational continuity, a school district has the discretion to use Title I or Title V funds to continue transporting the student for the remainder of the year.
- Q. Is the school district required to transport a homeless student to the school of origin/best interest if the student disobeys the rules in a cab and the driver refuses to transport the child for safety reasons and the district has no other means to transport the child?**
- A. All students are subject to the school district’s discipline policies including those related to student transportation. Subject to the district’s discipline policy, a homeless student may temporarily or permanently lose access to transportation if it’s warranted under the circumstances.
- Q. Which school is the “school of origin”?**
- A. The term “school of origin” is defined as the specific school building in a school district that the student attended when permanently housed or the school in which the student was last enrolled before becoming homeless.
- Q. Is a school of origin required to enroll kindergarteners who are siblings of homeless students at the beginning of the new school year?**
- A. Again, it comes down to determining the school of best interest for that child. However, if an entire family is homeless, the district can presume the kindergartener is too.
- Q. Once a child is homeless, who determines the “school of best interest”?**
- A. The school of origin shall comply, to the extent feasible, with the request of a parent or guardian regarding school selection; however, the school district ultimately determines the school of best interest. If the school district elects to send a child or youth to a school other than the school of origin or a school requested by the parent or guardian, district officials shall provide a written explanation, including the right to appeal the decision, and a copy of the standard complaint resolution to the parent or guardian or unaccompanied youth. While the school of best interest is being determined the child must be enrolled in the school of the parents’ choice until a final decision is made.

Q. Which school district is responsible for providing transportation to the school of best interest?

A. If the school of origin and the school of residence can not agree upon providing transportation, then McKinney-Vento requires the school districts to share the responsibility and cost for transportation equally.

Q. Are migrant children considered homeless?

A. The McKinney-Vento Act definition of homeless children and youths makes specific reference to “migratory children”. Therefore, migrant children’s circumstances should be reviewed with this definition in mind. Many migrant families share housing. Not all families who “double up” consider themselves homeless; sometimes families choose to live together. Other families are forced to double up because they’ve been made homeless due to unforeseen circumstances or because the immediacy of a circumstance requires sharing a residence. Migrant children residing in a fixed, regular, and adequate nighttime residence may not appear to be homeless; however, by definition, migrant families/children are highly mobile and often resort to residing in substandard housing. Therefore, the house they live in may not be fixed, regular or adequate. School districts should review the McKinney-Vento definition of homeless and evaluate each situation on a case-by-case basis.

Q. Are families living in Section 8 housing considered homeless? Are families living in transitional housing considered homeless?

A. The U.S. Department of Housing and Urban Development (HUD) Section 8 housing is considered as fixed, regular and part of a permanent housing plan. Other HUD housing is designed to serve as transitional housing for no more than two years at a time. School personnel will need to review the terms of housing contracts to determine if they are Section 8 (fixed, regular) or transitional (time limitations are imposed). For more information regarding HUD requirements go to: http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/homeless

Q. What if the student remains in transitional housing for four years, would they be considered homeless for all 4 years?

A. For HUD purposes some transitional housing is defined as two years or less. In cases where transitional housing is not supplied by HUD, the district may have to review the student’s circumstances to determine whether or not the student remains homeless. For example, if a student continues to reside in a shelter or in some other housing that is not intended to be fixed and regular or is not adequate, then the student is defined as homeless under the McKinney-Vento definition of homeless. Homelessness is not always temporary; sometimes it’s chronic.

Q. A family is sharing the housing of other persons for one year. During the year the children were transported to their school of origin in another district. A new school year is about to begin. Is the school that transported/enrolled them last year required to do so again? Or should the family enroll in their school district of residence? How long is a school district required to transport/enroll doubled up extended situations?

A. Homelessness is not limited in time and can, over time, become chronic. Therefore, the district of origin should review the family’s current living situation for purposes of determining whether the family remains homeless. For example, a family may have lost their home in a fire. If the home is being re-built, but is not yet finished, then the family may still be homeless. This question can only be answered by reviewing the McKinney-Vento definition of homeless and determining whether the family still falls within that definition.

Q. A district has a family that has been living in a hotel located in another district for three years. The children have been transported and enrolled each year in the non-resident district. Does the non-resident district have to continue to enroll and transport them for the fourth year since the once temporary situation now seems permanent?

A. While living temporarily in a hotel qualifies as homeless, the above situation may not be considered fixed, regular, and adequate enough to stop providing McKinney-Vento services to the students. The school must determine whether the living arrangement is due to the lack of an alternative adequate accommodation.

Q. What if a family is homeless during one school year and the next year they are still homeless, what does a school district have to do to provide services for that child?

A. If a child is homeless during one school year they can receive services for the remainder of that school year as a homeless child. If the child returns to the school district the next school year claiming to be homeless, the Homeless Liaison should reevaluate the situation prior to determining whether the child should remain in the district. Some questions to consider are: What is the family's current housing situation? Does it continue to meet one of the definitions of homeless under McKinney-Vento or § 167.020, RSMo? Is the child staying in the same location or is it a different location from the previous school year? What are the parents' plans? How far is it between the school of origin and the district of residence? Would it be in the child's best interest to enroll in the district of residence at the start of the new school year? What are the parents' plans?

Q. A homeless student violates the Safe Schools Act and is suspended or expelled from the school of origin. Is the school of residence required to immediately enroll this student?

A. Any time the enrolling district knows that a student has been suspended or expelled from another school as the consequence of the Safe Schools Act, the district must review its written discipline policy to determine if it would have suspended or expelled the student for the same reason. If so, the district would not have to enroll the student until such time as the suspension or expulsion expires. If the homeless student has an IEP, the school in which the student was enrolled must continue to provide a free and adequate education as required under the IDEA. If the district does not know about the Safe Schools Act violation, the student should be enrolled until the district receives the student's disciplinary record from the school he/she previously attended. If the district has reason to suspect that a child poses an immediate danger to others the superintendent may convene a hearing within five working days of the request to enroll to determine the appropriate course of action.

Q. Are there reliable web sources of information I can refer to when I have questions about educating homeless children and youth?

A. The Department's "Homeless Children and Youth Program" website is located at <https://dese.mo.gov/quality-schools/federal-programs/homeless-children-youth> This site provides links to useful informational sources such as the National Center for Homeless Education (NCHE) and the National Association for the Education of Homeless Children and Youth (NAEHCY).

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Appendix C

STANDARD COMPLAINT RESOLUTION PROCESS AS IT APPLIES TO DISPUTES REGARDING THE EDUCATION OF HOMELESS CHILDREN AND YOUTH

Disagreements and disputes are to be settled as close to the point of conflict as possible. Each LEA's (Local Educational Agency) Homeless Liaison shall assist the family and school to ensure compliance with federal and state legislation and policy governing the education of children and youth experiencing homelessness.

The Homeless Liaison shall work with the appropriate school representatives to address any policies or procedures that are identified as barriers in the access to and success within a free appropriate public education. The Office of the State Coordinator of Homeless Education may be consulted at any time for technical assistance.

The Department of Elementary and Secondary Education has a complaint resolution process in place. In a case where a dispute occurs regarding the education of a homeless child or youth, the following application of that process may be used:

Level I—

LEA Level—Every effort must be made to resolve the complaint or dispute at the local level before it is brought to the Department of Elementary and Secondary Education. It is the responsibility of the LEA to inform the complainant of the LEA's Complaint Resolution Procedure when a question concerning the education of a homeless child or youth arises.

A. If a question concerning the education of a homeless child or youth arises, the first person to contact in the LEA is the Homeless Coordinator. Someone in every school or in the office of the Superintendent will be able to identify the homeless coordinator. If a complaint needs to be registered, the complainant should ask for a copy of the local complaint procedure and follow it. If the district does not have a complaint procedure in place, the following steps are suggested:

1. Discuss the complaint with the Homeless Coordinator and ask for copies of the policies that the Board of Education in the LEA has adopted concerning the education of homeless children and youth.
2. Determine if the decision causing the complaint is covered by board policy and is in line with that policy.
3. If the complaint still seems justified, present it in writing and discuss it again with the Homeless Coordinator.
4. Ask for a written proposed resolution of the complaint or plan of action within five (5) days of the date of the written complaint.

B. If the complaint is not resolved at this level within five (5) days, it may be taken to the Superintendent of the LEA. In addition to presenting the written complaint, ask for an appointment to see the Superintendent to discuss the complaint. At the end of the discussion with the Superintendent, ask for a written resolution within five (5) days of the date of the discussion.

- C. If the complaint is still not resolved, it may be possible to appeal to the LEA Board of Education.

Level II—

State Level—If the complaint is not resolved in a satisfactory manner at the (LEA) local level and if it involves a state or federal program, the complaint may be brought to the Department of Elementary and Secondary Education. 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 the State Homeless Coordinator, Federal Programs, P.O. Box 480, Jefferson City, Missouri 65102-0480.
- B. Include in the complaint:
 - 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;
 - 4. a description of attempts that were made to resolve the issue at the LEA level.
- C. The Director of Federal Programs (the 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 thirty (30) days* after receiving a complaint, the director will resolve the complaint and will inform the parties, in writing, of the decision.
- E. If a complainant disagrees with the director's decision, the complainant may, within ten (10) working days, appeal the decision to the Missouri's Deputy Commissioner of Education. This appeal must be in writing and state why the complainant disagrees with the decision made by the director.
- F. Within thirty (30) days** after receiving the appeal, the Deputy Commissioner of Education 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) or youths in question must be enrolled in school. If the dispute revolves around which school is the school of best interest the child(ren) or youths 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 on an extension; however, every effort should be made to resolve the complaint in the shortest possible time.

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

Rev. 3/1/2017

Appendix D

PART D—GUIDELINES REGARDING THE USE OF SOCIAL SECURITY NUMBERS AND THE ATTENDANCE AT SCHOOL OF UNDOCUMENTED STUDENTS

(This memo was sent to all district superintendents in January, 1998)

The United States Supreme Court ruled in *Plyler v. Doe*, 457 U.S. 202, 102 S. Ct. 2382 (1982) that a state may not deny undocumented school-aged children entry into the public school system of that state. The Supreme Court overturned a Texas state law denying state aid to school districts admitting undocumented children of parents coming into the country illegally. For Missouri schools, this means that a district cannot deny admission to school or participation in any program based on a student's undocumented status. Any such discrimination would be a denial of the equal protection of the laws in violation of the Fourteenth Amendment of the United States Constitution.

Undocumented students are also protected under the federal law regarding student records. The Family Educational Rights and Privacy Act (FERPA) require that educational student records be kept confidential. Information that may be in school records regarding a student's undocumented status must be kept confidential. Disclosure should be made only after parental consent or based upon express authority provided under FERPA.

The Privacy Act of 1974 addresses the use of social security numbers by federal, state, or local governmental agencies. The Act states, in part that it is:

“unlawful for any federal, state, or local government agency to deny to any individual any right, benefit, or privilege provided by law because of such individual's refusal to disclose his social security number.”

Agencies that collect social security numbers must disclose how that number will be used and the limits of its use. Any request to disclose a social security number must be accompanied by the following statement:

“Any federal, state, or local government agency which requests an individual to disclose his social security number shall inform that individual whether the disclosure is mandatory or voluntary, by what statutory authority such number is solicited, and what uses will be made of it.”

If mandatory disclosure is not specifically authorized under the Privacy Act, then the disclosure is voluntary. A school district may not require disclosure of a social security number or use the refusal of a student to provide a social security number as a basis for denial of enrollment. Instead, districts should have in place a procedure for assigning a school-generated number to use in place of a social security number. Parents completing a free or reduced lunch application should be allowed to write “NONE” in the blank for their children's social security number.

Students enrolling in the Missouri public schools, including those with undocumented status, are exercising a right guaranteed under the laws of the State of Missouri. To deny enrollment based on undocumented status or based on a failure to disclose a social security number violates the equal protection clause of the Fourteenth Amendment and the federal statutes previously cited. School staff responsible for enrolling students must be aware of these requirements. Questions regarding school attendance for students with undocumented status should be directed to Julia Cowell, Director, Federal Compliance at 573-751-3468.

Appendix E

FUNCTION CODE DESCRIPTIONS

1200: Supplemental Instruction

Instructional activities designed primarily to deal with pupil exceptionalities. The Special Program Service Area includes pre-kindergarten, kindergarten, elementary and secondary service for the Gifted and Talented, Mentally Retarded, Physically Handicapped, Socially and/or Emotionally Handicapped, Culturally Disadvantaged, Pupils with Learning Disabilities, Bilingual Education, and Other Special Programs for other types of students.

1400: Student Activities

Direct and personal services for public school pupils, such as entertainment, publications, clubs, band and orchestra, that are managed or operated by the student body under the guidance and direction of an adult, and are not a part of the regular instructional program. These activities are characterized by being not-for-credit, other than school hours, interest of students, and partially or wholly self-sustaining via dues and admissions. This code may be incremented sequentially by one to cover the various activities individually.

2100: Non Instructional Support Services

Activities that are designed to assess and improve the well being of pupils and to supplement the teaching process.

2200: Professional Development

Activities that are designed primarily for assisting instructional staff in planning, developing, and evaluating the process of providing learning experiences for pupils. These activities include curriculum development, techniques of instruction, child development and understanding, staff training teacher mentor/professional development, etc.

2500: Pupil Transportation

Activities concerned with providing transportation for students.

3000: Community Services

Activities concerned with providing community services to the community as a whole or for some segment of the community.

Appendix F

CORE DATA REPORTING GUIDELINES FOR FEDERAL PROGRAMS Screens 18 and 20 (Exhibit 15)

All federally-funded positions, whether certified or non-certified, are to be reported. This includes **ALL** assignments approved in applications, full or part-time, during or outside of school hours. All positions are to be reported according to what the staff person is actually doing. Reported positions should not be different from what would be observed on site.

Enrollment for elementary teachers funded with federal funds is reported as the total number served for each subject. (Do not list each specific class, i.e. Supplemental Reading six times.) If an elementary teacher is assigned more than one subject, each is listed as a separate assignment with the total enrollment for each subject indicated. If the building is departmentalized, each class is reported as a separate assignment with the enrollment in each class indicated. Paras do not have a caseload; therefore, no enrollment is reported.

Instructional minutes are to be reported per week for each class/assignment. Teachers paid with federal funds have the **same** number of instructional and planning minutes as classroom staff. (See Federal Programs Administrative Manual for further clarification.)

After-school tutoring is to be provided by a certified teacher in small groups and is reported on Screens 18 and 20. The Extra Duty Salary or Career Ladder amount is entered on Screen 18, and may be revised at the end of the school year to reflect the correct amount. On Screen 20 the appropriate code to reflect what the teacher is tutoring (Supplemental Communication Arts/Reading/Math), the weekly minutes, the average weekly number of students, the program code to identify the funding source (Career Ladder would have no program code), and the Delivery System “H” for all before or after-school tutoring are entered. The “H” Delivery System will not increase the teacher’s total instructional minutes. **Note:** Federal funds may not pay for tutoring to meet state guidelines/requirements as in Senate Bill 319.

Teachers who are assisted by a paraprofessional should have the para’s name noted in the “Comment” box. Accordingly, the teacher(s) the para is assisting should be entered in the Comment box on their Screen 20. If course code 887900 (Other Pupil Personnel) is used, enter the specific job title in the “Comment” box.

Note: Course codes 994210 (At-Risk), 994020 (Life Skills), and 998800 (ISS) are to be used **ONLY** for Title I Neglected/Delinquent Institution programs or the Title IV.A program as indicated in the following chart.

Certification and training determine the name and course code to be used for Title I Reading programs. **Note:** There have been some changes in course code numbers. Please refer to the following chart to complete screens 18 and 20 for **all staff** funded with Federal Programs.

(Exhibit 10) Course Number	Program/ Position Title	(Exhibit 13) Program Code	(Exhibit 3) Position Code	(Exhibit 14) Delivery System	(Exhibit 12) Grade Level	Required Certification
	Title X, Part C: Homeless					
881750	Homeless Liaison	14	10	--	--	Any certificate at any grade level or Social Work Degree
888400	Secretary	14	80	--	--	None
See Exhibit 10	Teacher	14	60	--	--	Appropriate teaching certification
---	Early Childhood Educator	14	60	--	PK	Early Childhood (PK)
888200	Para- professional (Teacher Assistant)	14	80	--	PK	60 hrs. or ParaPro Praxis
887600	Nurse	14	70	--	--	Licensed RN
887400	Social Worker	14	70	--	--	Social Work Degree
887900	Case Manager	14	70	--	--	Appropriate training and/or experience
See Exhibit 10	Guidance Counselor	14	50	--	--	Appropriate guidance certificate
---	Personal Assistant (Child Care)	14	90	--	--	Appropriate training and/or experience
889650	Translator for ELL	14	90	--	--	Fluent in English and in translated language

Appendix G

MEMORANDUM to ED GRANTEEES REGARDING THE USE OF GRANT FUNDS FOR CONFERENCES AND MEETINGS (June 2012)

This memorandum; from the U.S. Department of Education, is to remind you that grantees must take into account the following factors when considering the use of grant funds for conferences and meetings:

- Before deciding to use grant funds to attend or host a meeting or conference, a grantee should:
 - Ensure that attending or hosting a conference or meeting is consistent with its approved application and is reasonable and necessary to achieve the goals and objectives of the grant;
 - Ensure that the primary purpose of the meeting or conference is to disseminate technical information, (e.g., provide information on specific programmatic requirements, best practices in a particular field, or theoretical, empirical, or methodological advances made in a particular field; conduct training or professional development; plan/coordinate the work being done under the grant); and
 - Consider whether there are more effective or efficient alternatives that can accomplish the desired results at a lower cost, for example, using webinars or video conferencing.
- Grantees must follow all applicable statutory and regulatory requirements in determining whether costs are reasonable and necessary, especially the:
 - Cost Principles for Federal grants set out at 2 CFR Part 225 (OMB Circular A-87, State, Local, and Indian Tribal Governments):
http://www.whitehouse.gov/omb/circulars_a087_2004/
 - 2 CFR Part 220 (OMB Circular A-21, Educational Institutions),
http://www.whitehouse.gov/omb/circulars_index-education/ and
 - 2 CFR 230 (OMB Circular A-122, Non-Profit Organizations)
http://www.whitehouse.gov/omb/circulars_index-education/

In particular, remember that:

- Federal grant funds cannot be used to pay for alcoholic beverages; and
- Federal grant funds cannot be used to pay for entertainment, which includes costs for amusement, diversion, and social activities.
- Grant funds may be used to pay for the costs of attending a conference. Specifically, Federal grant funds may be used to pay for conference fees and travel expenses (transportation, per diem, and lodging) of grantee employees, consultants, or experts to attend a conference or meeting if those expenses are reasonable and necessary to achieve the purposes of the grant.
 - When planning to use grant funds for attending a meeting or conference, grantees should consider how many people should attend the meeting or conference on their behalf. The number of attendees should be reasonable and necessary to accomplish the goals and objectives of the grant.
- A grantee hosting a meeting or conference may not use grant funds to pay for food for conference attendees unless doing so is necessary to accomplish legitimate meeting or conference business.

- A working lunch is an example of a cost for food that might be allowable under a Federal grant if attendance at the lunch is needed to ensure the full participation by conference attendees in essential discussions and speeches concerning the purpose of the conference and to achieve the goals and objectives of the project.
- A meeting or conference hosted by a grantee and charged to a Department grant must not be promoted as a U.S. Department of Education conference. This means that the seal of the U.S. Department of Education must not be used on conference materials or signage without Department approval.
 - All meeting or conference materials paid for with grant funds must include appropriate disclaimers, such as the following:

The contents of this (insert type of publication; e.g., book, report, film) were developed under a grant from the Department of Education. However, those contents do not necessarily represent the policy of the Department of Education, and you should not assume endorsement by the Federal Government.
- Grantees are strongly encouraged to contact their project officer with any questions or concerns about whether using grant funds for a meeting or conference is allowable prior to committing grant funds for such purposes.
 - A short conversation could help avoid a costly and embarrassing mistake.
- Grantees are responsible for the proper use of their grant awards and may have to repay funds to the Department if they violate the rules on the use of grant funds, including the rules for meeting- and conference-related expenses.

Appendix H

Education for Homeless Children and Youths Program
Non-Regulatory Guidance
Title VII-B of the McKinney-Vento Homeless Assistance Act, as amended by the
Every Student Succeeds Act
July 27, 2016
Updated March 2017

Executive Summary and Key Changes

The Education for Homeless Children and Youth (EHCY) program is authorized under Title VII-B of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.) (McKinney-Vento Act). The McKinney-Vento Act was originally authorized in 1987 and most recently re-authorized in December 2015 by the Every Student Succeeds Act (ESSA).

The McKinney-Vento Act is designed to address the challenges that homeless children and youths have faced in enrolling, attending, and succeeding in school. This particularly vulnerable population of children has been increasing; from the 2006-2007 school year to the 2013-2014 school year, the total number of homeless children and youths approximately doubled from 679,724 to 1,301,239 students, according to EHCY program data. Under the McKinney-Vento Act, State educational agencies (SEAs) must ensure that each homeless child and youth has equal access to the same free, appropriate public education, including a public preschool education, as other children and youths. Homeless children and youths must have access to the educational and related services that they need to enable them to meet the same challenging State academic standards to which all students are held. In addition, homeless students may not be separated from the mainstream school environment.³ SEAs and local educational agencies (LEAs) are required to review and undertake steps to revise laws, regulations, practices, or policies that may act as barriers to the identification, enrollment, attendance, or success in school of homeless children and youths.

The McKinney-Vento Act includes, among other things, new or changed requirements focused on:

1. Identification of homeless children and youths;
2. Preschool-aged homeless children, including clarification that local liaisons must ensure that these children and their families have access to and receive services, if eligible, under LEA-administered preschool programs, including Head Start, Part C of the Individuals with Disabilities Education Act (IDEA) (Early Intervention Program for Infants and Toddlers with Disabilities), and other preschool programs administered by the LEA;
3. Collaboration and coordination with other service providers, including public and private child welfare and social services agencies; law enforcement agencies; juvenile and family courts; agencies providing mental health services; domestic violence agencies; child care providers; runaway and homeless youth centers; providers of services and programs funded under the Runaway and Homeless Youth Act; and providers of emergency, transitional, and permanent housing, including public housing agencies, shelter operators, and operators of transitional housing facilities;
4. Professional development and technical assistance at both the State and local levels;
5. Removing enrollment barriers, including barriers related to missed application or enrollment deadlines, fines, or fees; records required for enrollment, including immunization or other

required health records, proof of residency, or other documentation; or academic records, including documentation for credit transfer;

6. School stability, including the expansion of school of origin to include preschools and receiving schools and the provision of transportation until the end of the school year, even if a student becomes permanently housed;

7. Privacy of student records, including information about a homeless child or youth's living situation; and

8. The dispute resolution process.

In addition, the ESSA removes "awaiting foster care placement" from the definition of "homeless children and youths."

The McKinney-Vento Act strongly emphasizes the importance of school stability for homeless children and youths. Changing schools multiple times significantly impedes a student's academic and social growth. The research on highly mobile students, including homeless students, indicates that a student can lose academic progress with each school change. Highly mobile students have also been found to have lower test scores and worse overall academic performance than peers who do not change schools frequently. Therefore, the McKinney-Vento Act calls for LEAs to maintain students in their school of origin to promote school stability and greater educational outcomes overall, unless it is not in the student's best interest.

Significantly, a number of the changes that the ESSA made to the McKinney-Vento Act highlight and respond to the needs of homeless children and youths across the educational spectrum. There is an increased focus on services for preschool-aged homeless children, which data show compose a major share of the overall homeless population;⁷ this includes the explicit inclusion of preschools in the definition of "school of origin." A number of changes also draw attention to the need for homeless youths in secondary school to be college- and career-ready, and the important role that school staffs play in the transition to postsecondary education. The ESSA also requires that SEAs implement procedures to ensure full and partial credit transfer for these students. Additionally, the McKinney-Vento Act now has a strengthened emphasis on the unique needs of, and supports for, unaccompanied homeless youths, such as through the verification of independent student status for the purposes of the Free Application for Federal Student Aid (FAFSA) and improved coordination with other federally funded homeless assistance programs for which these youths may be eligible.

Transition to ESSA Amendments

In general, SEAs and LEAs must begin implementing the new McKinney-Vento Act requirements by October 1, 2016. As noted above, however, the ESSA amended section 725 of the McKinney-Vento Act, removing "awaiting foster care" from the definition of "homeless children and youths." This change is effective on December 10, 2016, for most States.

This guidance also addresses certain provisions under Title I, Part A of the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the ESSA, that are specifically relevant to homeless children and youths, including changes to requirements for determining the LEA set-aside for homeless children and youths. In general, these provisions take effect beginning with the 2017-2018 school year. Thus, SEAs and LEAs should begin planning for the implementation of these changes in spring 2017, and SEAs should have mechanisms in place to provide technical assistance and guidance, as well as a coordinated review process between the Office of the Coordinator and SEA-level Title I, Part A program staff.

Purpose of the Guidance

This revised non-regulatory guidance for the McKinney-Vento program replaces the July 2004 guidance and includes new questions that reflect both the amendments to the McKinney-Vento Act made by the ESSA, which take effect on October 1, 2016,⁹ and new technical assistance on promising practices for implementing homeless education requirements at the State and local levels. The guidance describes the requirements of the new statute and provides recommendations for addressing many of those requirements.

The Department has determined that this guidance is significant guidance under Office of Management and Budget's Final Bulletin for Agency Good Guidance Practices, 72 Fed. Reg. 3432 (Jan. 25, 2007). See www.whitehouse.gov/sites/default/files/omb/fedreg/2007/012507_good_guidance.pdf. Significant guidance is non-binding and does not create or impose new legal requirements.

Introduction

A. Rights and Eligibility

A-1. What is meant by the term “homeless children and youths”?

Section 725(2) of the McKinney-Vento Act¹⁰ defines “homeless children and youths” as individuals who lack a fixed, regular, and adequate nighttime residence.

The term includes—

¹⁰ All statutory citations are to the McKinney-Vento Act unless otherwise indicated.

¹¹ For “covered” States (i.e., those that have a statutory law that defines or describes the phrase “awaiting foster care placement” for purposes of a program under subtitle B of title VII of the McKinney-Vento Homeless Assistance Act), the effective date for this change is December 10, 2017. (ESSA section 9105(b)).

Throughout this document, unless otherwise indicated, citations to the ESEA refer to the ESEA, as amended by the ESSA.

- Children and youths who are:
 - sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason (sometimes referred to as “doubled-up”);
 - living in motels, hotels, trailer parks, or camping grounds due to lack of alternative adequate accommodations;
 - living in emergency or transitional shelters; or
 - abandoned in hospitals;
- 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;
- Children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and
- Migratory children who qualify as homeless because they are living in circumstances described above.

A-2. Are children who are awaiting foster care placement still eligible for services under the McKinney-Vento Act?

The McKinney-Vento Act no longer includes children and youths who are awaiting foster care placement in the definition of “homeless children and youths.” For all non-“covered” States, this change is effective on December 10, 2016. This means that after the effective date, children who are awaiting foster care placement will no longer be considered homeless and will therefore not be eligible for McKinney-Vento services unless they meet the revised definition of “homeless children and youths.”

The Elementary and Secondary Education Act of 1965 (ESEA), as amended by the ESSA includes new provisions for ensuring the educational stability of children in foster care under Title I, Part A.

A-3. What criteria may an LEA consider when determining if a child or youth lives in “substandard housing”?

The inclusion of substandard housing in the definition of homeless children and youths has caused some confusion because standards for adequate housing may vary by locality. In determining whether a child or youth is living in “substandard housing,” an LEA may consider whether the setting in which the family, child, or youth is living lacks one of the fundamental utilities such as water, electricity, or heat; is infested with vermin or mold; lacks a basic functional part such as a working kitchen or a working toilet; or may present unreasonable dangers to adults, children, or persons with disabilities. Each city, county, or State may have its own housing codes that further define the kind of housing that may be deemed substandard.

A-4. How can SEAs and LEAs ensure that homeless children and youths have equal access to the same free, appropriate public education, including public preschool education, as provided to other children and youths?

The McKinney-Vento Act includes a broad, ongoing requirement for SEAs and LEAs to review policies or practices that may act as barriers to the identification, enrollment, attendance, and school success of homeless children and youths, including barriers due to outstanding fees or fines or absences. (*See, e.g.,* sections 721, 722(g)(1)(I)). It is important for SEAs and LEAs to consistently review their policies and practices with regular input from homeless parents, youths, and advocates so that new barriers, or barriers that the SEA or LEA staff may be unaware of, do not prevent children and youths from receiving the free, appropriate public education to which they are entitled.

In addition, where laws, regulations, practices, or policies may act as a barrier to the identification, enrollment, attendance, or success in school of homeless children and youths, SEAs and LEAs must 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. (Sections 721, 722(g)(1)(I), 722(g)(7)). The process of reviewing and revising policies should include a review of school discipline policies that disproportionately impact homeless students, including those who are also children and youths of color; those who identify as lesbian, gay, bisexual, transgender, and queer or questioning (LGBTQ); English learners¹⁴; and students with disabilities. In addition, SEAs and LEAs retain their obligations to ensure that homeless children and youths who are eligible children with disabilities under Part B of the IDEA or qualified students with disabilities under section 504 of the Rehabilitation Act of 1973 (Section 504) retain the rights and protections of those laws, including their right to receive a free appropriate public education (FAPE). (*See* 34 CFR part 300 (the Department’s regulations implementing Part B of the IDEA) and 34 CFR part 104 (the Department’s regulations implementing Section 504)). State lead agencies, and LEAs, if applicable, also retain their responsibilities to ensure that eligible infants

Additional information about an LEA’s obligations to EL students and limited English proficient parents under Title VI and EEOA is available in a Dear Colleague Letter jointly released by ED and the Department of Justice in January 2015, available at <http://www2.ed.gov/about/offices/list/ocr/letters/colleague-el-201501.pdf>. The Department’s English Learner Tool Kit helps SEAs and LEAs to fulfill these obligations and support ELs. The Tool Kit has 10 chapters (one for each section of the DCL), contains an overview, sample tools, and resources, and is available at <http://www2.ed.gov/about/offices/list/oela/english-learner-toolkit/eltoolkit.pdf>.

A-5. What Federal civil rights requirements apply to school districts in educating homeless children?

As recipients of Federal financial assistance and as public entities, school districts must not discriminate against homeless children in their educational programs based on race, color, national origin, sex, age, or disability. The Department's Office for Civil Rights (OCR) enforces Federal laws that prohibit discrimination on the basis of—

- race, color, or national origin, including discrimination based on a person's limited English proficiency or English learner status or discrimination based on a person's actual or perceived shared ancestry or ethnic characteristics (Title VI of the Civil Rights Act of 1964);
- sex, including discrimination based on pregnancy or parental status, sex stereotypes (such as treating persons differently because they do not conform to sex-role expectations or because they are attracted to or are in relationships with persons of the same sex), and gender identity or transgender status (Title IX of the Education Amendments of 1972);
- age (Age Discrimination Act of 1975); and
- disability (Section 504 of the Rehabilitation Act of 1973, as applied to recipients of Federal financial assistance, and Title II of the Americans With Disabilities Act of 1990, as applied to public educational entities, regardless of Federal funds).

To find contact information for a regional OCR office, visit:

<https://wdcrobcolp01.ed.gov/CFAPPS/OCR/contactus.cfm>.

A-6. What are the responsibilities of LEAs regarding the privacy of information about a student's homelessness?

Information about a student's living situation that is maintained by the LEA is part of the student's record, subject to the protections of the Family Educational Rights and Privacy Act (FERPA). FERPA protects the privacy of student education records. FERPA gives parents certain rights with respect to their children's education records. These rights transfer to the student when he or she reaches the age of 18 or attends a school beyond the high school level. Students to whom the rights have transferred are called "eligible students." Parents or eligible students have the right to inspect and review the student's education records maintained by the LEA. Parents or eligible students also have the right to seek to correct records that they believe to be inaccurate or misleading. FERPA also prohibits an LEA from disclosing personally identifiable information (PII) from students' education records without the consent of a parent or eligible student; unless an exception to FERPA's general consent rule applies.

One such exception to FERPA's general consent rule is for information that the LEA has designated as "directory information," which is information that would not generally be considered harmful or an invasion of privacy if disclosed, such as a student's name or photograph, under the conditions set forth in the FERPA regulations at 34 CFR § 99.37. Although an LEA or an educational institution may designate a student's address as directory information under FERPA, under the McKinney-Vento Act, information regarding a student's living situation is not considered directory information (section 722(g)(3)(G)). As a result, information about a student's living situation must be provided the same protections as other non-directory, PII contained in student education records under FERPA. The early intervention and education records of infants and toddlers and children with disabilities also are protected by the confidentiality of information provisions in Parts B and C of the IDEA. (*See* 20 U.S.C. 1417(c) and 1442 and 34 CFR §§ 300.610 through 300.626 (Part B) and 34 CFR §§ 303.401 through 303.417 (Part C)). These IDEA regulations incorporate many of the protections of, and are consistent with, the FERPA statute and regulations, including the FERPA requirement to obtain prior written consent of the parent (or in the case of Part B, a student who has reached the age of majority under State law) and the FERPA exceptions to the prior written consent requirement. (*See* 34 CFR § 300.622 (Part B) and 34 CFR § 303.414 (Part C)).

A-7. What requirements must be met in order for an LEA to disclose PII from education records?

Generally, LEAs must obtain prior written consent from the parent or eligible student in order to disclose any PII from a student's education record. However, there are a number of exceptions to this general requirement. For example, FERPA allows, but does not require, LEAs to disclose PII from a student's education records, without prior written consent, to the following parties under the following conditions:

- school officials with legitimate educational interests;
- other schools or school systems to which a student seeks or intends to enroll or to transfer under the conditions set forth in the FERPA regulations at 34 CFR § 99.34;
- authorized representatives of specified officials to conduct audits or evaluations of Federal- or State-supported education programs under the conditions set forth in the FERPA regulations at 34 CFR § 99.35;
- appropriate parties in connection with a student's application for, or receipt of, financial aid;
- organizations conducting certain studies for or on behalf of the school or the LEA under the conditions set forth in the FERPA regulations at 34 CFR § 99.31(a)(6);
- accrediting organizations to carry out their accrediting functions;
- appropriate officials in cases of health and safety emergencies under the conditions set forth in the FERPA regulations at 34 CFR § 99.36;
- State and local authorities, within a juvenile justice system, pursuant to State law under the conditions set forth in the FERPA regulations at 34 CFR §§ 99.31(a)(5) and 99.38; or
- to comply with a judicial order or lawfully issued subpoena under the conditions set forth in the FERPA regulations at 34 CFR § 99.31(a)(9).

As noted in response to question A-6, the confidentiality of information provisions applicable to the disclosure of PII from the education records of children with disabilities under Part B of the IDEA, and from the early intervention records of infants and toddlers with disabilities, where applicable.

B. Prohibition Against Segregation

B-1. May States or districts segregate homeless children and youths in separate schools or in separate programs within a school?

No. Homelessness is not sufficient reason to separate students from the mainstream school environment. (Section 721(3)). If a State receives funds under the McKinney-Vento program, every district in that State—whether or not it receives a McKinney-Vento subgrant from its SEA—is prohibited from segregating homeless students in separate schools¹⁸ or in separate programs within schools, based on the child's or youth's homeless status. (Section 722(e)(3)). SEAs and LEAs must adopt policies and practices to ensure that students are not segregated or stigmatized on the basis of their homeless status. (Section 722(g)(1)(J)(i)).

Schools may not provide services with McKinney-Vento funds on school grounds in settings that segregate homeless children and youths from other children and youths (except as necessary 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). (Section 723(a)(2)(B)(ii)). In addition, services provided with McKinney-Vento Act funds must not replace the regular academic program and must instead be designed to expand upon or improve services provided as part of the school's regular academic program. (Sections 723(a)(2)(A)(iii), 723(a)(3)).

B-2. May a district educate homeless children at an off-site facility, such as at a shelter?

No. Homeless children and youths must be educated as part of a school's regular academic program and services must be provided to homeless children and youths through programs and mechanisms that integrate homeless children and youths with their non-homeless peers. (See sections 721(1), 721(3), 722(e)(3),

722(g)(1)(J)(i)). Services provided with McKinney-Vento funds must expand upon or improve services provided as part of the regular school program. (Section 723(a)(2)(iii)).

B-3. May a school separate a child from the regular school program if he or she resides in a domestic violence shelter?

No. However, schools can and should coordinate with domestic violence service providers and others, as appropriate, to take all other necessary steps to protect any child who is a victim of domestic violence (including as a witness), such as protecting the child’s identity in school data systems, arranging for anonymous pick-up and drop-off locations for school buses, enrolling the child in a different school, sensitizing bus drivers and school personnel to the child’s circumstances, training school staff on confidentiality laws and policies, and helping the family to file copies of protective orders with the school. In this way, schools can address safety concerns and provide equal educational opportunities without causing further disruption in children’s lives.

State Activities

C. Federal Awards to States

C-1. On what basis does the Department award McKinney-Vento funds to States?

The Department awards McKinney-Vento funds to States by formula. The amount that a State receives in a given year is based on the proportion of funds allocated nationally that it receives under Title I, Part A of the ESEA, for that year. (Section 722(c)(1)). For the purpose of determining allocations, the term “State” includes each of the fifty States, the District of Columbia, and Puerto Rico. (Section 725(5)).

C-2. Are the outlying areas and the Bureau of Indian Education (BIE) eligible to receive McKinney-Vento funds?

Yes. The Department is authorized to reserve 0.1 percent of each year’s appropriation to award grants to the outlying areas (i.e., the U.S. Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands). (Section 722(c)(2)(A)). In addition, the Department transfers, under a memorandum of agreement, one percent of each year’s appropriation to the BIE for programs for homeless Indian students served by schools funded by the BIE. (Section 722(c)(2)(B)).

D. State Uses of Funds

D-1. For what purposes may a State use its McKinney-Vento allocation?

A State may use its McKinney-Vento allocation for the following purposes:

- *State activities* - A State that receives an allocation greater than the State minimum allotment (i.e., greater than \$150,000) may reserve for State-level activities up to 25 percent of its allocation for that fiscal year. A State funded at the minimum level may reserve for State-level activities up to 50 percent of its allocation for that fiscal year.
- *Subgrants to LEAs* - An SEA must award funds not reserved for State-level activities to LEAs on a competitive basis.

(Section 722(e)(1)).

D-2. For what purposes may a State use McKinney-Vento funds that are reserved for State-level activities?

A State may use McKinney-Vento funds, which are made available for State use, to support the broad array of activities conducted by the Office of the Coordinator. (See Section 722(f) and Part E of this guidance.) The SEA may conduct these activities directly or through grants or contracts. (Section 722(e)(2)).

E. Office of the Coordinator

E-1. What are the primary responsibilities of the Office of Coordinator for Education of Homeless Children and Youths?

The primary responsibilities of the Office of Coordinator (State Coordinator) are to:

- Gather and make publicly available reliable, valid, and comprehensive information on homeless children and youths, as described in more detail in question E-5;
- Develop and carry out the State's McKinney-Vento plan;
- Collect and transmit to the Department, at such time and in such manner as the Secretary may reasonably require, a report containing the information that the Department determines is necessary to assess the educational needs of homeless children and youths;
- Coordinate activities and collaborate with educators and social service providers on behalf of the McKinney-Vento program; and
- Provide technical assistance to, and conduct monitoring of, LEAs in coordination with local liaisons to ensure that LEAs comply with the McKinney-Vento Act, also responding to inquiries from parents, guardians and homeless youths to ensure they receive the full protections of the law and relevant services.

E-2. What are State Coordinators' responsibilities regarding technical assistance and professional development?

Through strong leadership, and collaboration and communication with local liaisons, the State Coordinator should help ensure that districts carry out the requirements of the McKinney-Vento Act. State Coordinators should establish clear-cut policies and procedures at the State level and communicate this information to districts in order to facilitate the smooth and consistent implementation of the McKinney-Vento Act.

State Coordinators must provide professional development opportunities for LEA personnel, including the local liaison, to assist the personnel and liaison in identifying and meeting the needs of homeless children and youths. This includes providing training for local liaisons on the definitions of terms related to homelessness and eligibility requirements for Federal programs that serve homeless individuals. (Section 722(f)(6)). For more information, please see questions L-4 and L-5. Finally, State Coordinators must respond to inquiries from parents and guardians of homeless children and youths, and from unaccompanied homeless youths, to ensure that each child or youth who is the subject of the inquiry receives the full protections and services provided under McKinney-Vento. (Section 722(f)(7)).

E-3. By what means should State Coordinators provide technical assistance and professional development?

The State Coordinator may provide a wide range of technical assistance activities. These may include, but are not limited to, conferences, guidance, a State website that addresses McKinney-Vento issues, a directory of State resources, listservs, a toll-free help line, and newsletters or bulletins.

State-level technical assistance will be essential to familiarize new local liaisons with the requirements of the McKinney-Vento Act and to provide guidance on serving eligible students.

E-4. What are examples of technical assistance or professional development that school districts may need?

Areas in which school districts and local liaisons may need technical assistance include:

- Understanding the requirements of the McKinney-Vento Act;
- Establishing procedures to address problems related to school enrollment and selection;
- Establishing procedures to ensure homeless children and youth receive full and partial credit for work completed;
- Arranging transportation, including across district and State lines;
- Resolving disputes in an efficient and effective manner;

- Determining LEA needs and developing a plan for services;
- Creating school district and community awareness of the needs of eligible students;
- Identifying Federal, State, and local resources;
- Identifying homeless children and youths;
- Monitoring attendance, chronic absenteeism, dropout rates, suspensions, and expulsions among homeless children and youths;
- Collecting and reporting data;
- Enhancing parental involvement activities; and
- Identifying strategies for improving academic achievement.

E-5. What are the State Coordinator’s duties pertaining to information collection?

The State Coordinator is required to gather and make publicly available reliable, valid, and comprehensive information on:

- The number of homeless children and youths identified in the State;
- The nature and extent of the problems homeless children and youths encounter in gaining access to public preschool programs and to public elementary schools and secondary schools;
- The difficulties in identifying special needs and barriers to participation and achievement of such children and youths;
- Any progress made by the SEA and LEAs in the State in addressing such problems and difficulties; and
- The success of McKinney-Vento programs in identifying homeless children and youths and allowing children and youths to enroll in, attend, and succeed in, school.

E-6. What information does the McKinney-Vento Act require the SEA to post on its website?

The McKinney-Vento Act requires that the number of children and youths identified as homeless in each State be posted annually on the SEA’s website. (Section 722(f)(1)(A)). The homeless student data should be the latest verified and certified statewide homeless student enrollment total.

In addition, the SEA must post an annually updated list of the local liaisons on its website. (Section 722(f)(1)(A)). The Department recommends that each SEA have a McKinney-Vento website where this information, together with the homeless student count, can be easily located and ensure that the updated local liaison list and homeless student enrollment total be published before the next school year begins.

E-7. What Federal performance reporting requirements must State Coordinators meet?

The McKinney-Vento Act gives the Department the authority to collect from States, at such times as the Department may reasonably require, information necessary to assess the educational needs of homeless children and youths. All LEAs and SEAs must provide data as requested by the Secretary or required in the McKinney-Vento Act and other Federal laws, such as the ESEA. (Sections 722(f)(3), 724(h)(1)(D)). Any data submitted to the Department should meet standards of quality, validity, completeness, and reliability set by the Department. This data should also be used by LEAs and SEAs to identify areas for improvement related to identifying and educating homeless children and youths.

Local liaisons, State Coordinators, *EDFacts* coordinators, Consolidated State Performance Report (CSPR) coordinators, and data stewards should coordinate training and technical assistance efforts to ensure that school, LEA, and SEA personnel are aware of requirements and standards for data reporting. To ensure that data submitted to the SEAs, and subsequently to the Department, is accurate and timely, *EDFacts* coordinators, CSPR coordinators, and data stewards within the LEAs and SEAs should provide local liaisons and State Coordinators with access to program data, allow them to verify data accuracy, and notify them prior to submitting original files or corrections to the SEA or Education Data Exchange Network (EDEN) Submission System.

E-8. What are the State Coordinator’s responsibilities regarding the coordination of services?

Under Section 722(f)(4), State Coordinators must coordinate activities and collaborate with: 14

- **Educators**, including teachers, special education personnel, administrators, and child development and preschool program personnel;
- **Providers of social services** to homeless children and youths and their families, including public and private child welfare and social services agencies, law enforcement agencies, juvenile and family courts, agencies providing mental health services, domestic violence agencies, child care providers, runaway and homeless youth centers, and providers of services and programs under the Runaway and Homeless Youth Act (RHYA) (Public Law 110-378);
- **Providers of emergency, transitional, and permanent housing** to homeless children and youths, and their families, including public housing agencies, shelter operators, operators of transitional housing facilities, and providers of transitional living programs for homeless youths;
- **Local liaisons**; and
- **Community organizations and groups** representing homeless children and youths and their families.

State Coordinators must also coordinate services with State and local housing agencies responsible for developing comprehensive affordable housing strategies under Section 105 of the Cranston/Gonzalez National Affordable Housing Act (Public Law 101-625) to minimize educational disruption for children and youths who become homeless. (Section 722(g)(5)(B)). Additionally, State Coordinators should coordinate housing, health, and other services with the regional representatives of the **United States Interagency Council on Homelessness**.

More information on the United States Interagency Council on Homelessness can be found at <https://www.usich.gov/>.

Coordinators should also coordinate and consult with State and local policymakers to ensure that legislation and policies do not create barriers for the education of homeless children and youths, which may in some cases fall under their ongoing obligation to review and revise such barriers. For example, status offense laws or ordinances that criminalize homelessness can make it more difficult for homeless families and youths to get to school ready to learn. Likewise, a lack of affordable housing within a community may make it difficult for families to obtain permanent housing and escape the cycle of homelessness.

E-9. What are the monitoring requirements for State Coordinators?

State Coordinators must conduct monitoring of LEAs, in coordination with local liaisons, to ensure that all LEAs are complying with the requirements of the McKinney-Vento Act. (Section 722(f)(5)). SEAs have a range of options for monitoring, including conducting data and document reviews and interviews remotely, having other staff conduct consolidated program monitoring, and hiring contractors to do the monitoring. The monitoring process should include a formal letter of notification; protocols for interviews, observations, and document review, as applicable; a written report of whether requirements were met or corrective actions are required; and a process for resolving corrective actions.

Tips for Ensuring that State Coordinators and Local Liaisons Have Sufficient Capacity and Knowledge

The McKinney-Vento Act highlights the need for SEAs and LEAs to provide adequate training to State Coordinators and local liaisons and to ensure that State Coordinators and liaisons have sufficient capacity to carry out their duties. Although some States and LEAs serve a comparatively small number of homeless students, many State Coordinators and local liaisons have a significant number of other responsibilities as well.

Regardless of their varying responsibilities, there are common monitoring and reporting requirements, as well as background information, that State Coordinators and local liaisons should be knowledgeable of to be effective in their duties. To confirm what these are, when an SEA appoints a new State Coordinator, he or she should contact the National Center for Homeless Education (NCHE) to receive Federal updates, information about training opportunities, and McKinney-Vento program communications. NCHE also operates a listserv for local liaisons and homeless educators, and offers a variety of professional development through webinars and written products.

For background knowledge, State Coordinators and local liaisons should understand the challenges faced by impoverished and homeless children, youths, and families, including unaccompanied youths and preschool aged children, as well as the rights and services provided to homeless children and youths through the McKinney-Vento Act and other Federal and State laws and programs. They should also be familiar with the full SEA and LEA context in which the law will be implemented, including the budgeting system, State student data collection system, and State-specific or local policies pertaining to homeless children and youths.

In addition, local liaisons and State Coordinators should be familiar with community and local public agency resources for homeless children and youths. SEAs and LEAs should allocate sufficient time for State Coordinators and local liaisons to do their jobs effectively and should support them in fulfilling their duties as outlined in the law and in making timely decisions. SEA and LEA administrators should review the legal requirements for the position, data indicating the prevalence and needs of homeless children and youths in the State or school district (including efforts that may be necessary to improve the identification of such children and youths), and past technical assistance provided to the LEAs in order to determine how much time the McKinney-Vento program requires to be managed well at the State and LEA levels. Consideration should be given to the number of LEAs in the State or schools and students in the district; the number of identified homeless students in the State or district as a percentage of students living in poverty; the number of LEAs identifying zero homeless students; and any recent Department and State monitoring findings. For the State Coordinator, time allocation should also allow for conducting the subgrant process and LEA monitoring. For local liaisons, administrators may wish to discuss the time allocation with former local liaisons in the LEA, liaisons from other LEAs, or the State Coordinator to determine what is realistic and is being prioritized in a given year, for example, new data collections or monitoring visits.

Appendix I

For what activities may an LEA use McKinney-Vento subgrant funds?

LEAs must use McKinney-Vento funds to assist homeless children and youths in enrolling, attending, and succeeding in school. (*See, e.g.*, sections 722(g)(6), 723(d)). In particular, the funds may support the following activities:

1. Tutoring, supplemental instruction, and other educational services that help homeless children and youths reach the same challenging State academic standards the State establishes for other children and youths. (Section 723(d)(1)). As clearly specified in the ESEA, all academic enrichment programs for disadvantaged students, including programs for homeless students, must be aligned with State standards and curricula. Additionally, when offering supplemental instruction, LEAs should focus on providing services for children and youths that reflect scientifically based research as the foundation for programs and strategies to ensure academic success.
2. Expedited evaluations of eligible students to measure their strengths and needs. (Section 723(d)(2)). These evaluations should be done promptly in order to avoid a gap in the provision of necessary services to those children and youths. Evaluations may also determine a homeless child or youth's possible need or eligibility for other programs and services, including educational programs for gifted and talented students; special education and related services for children with disabilities under Part B of the IDEA; special education or related aids and services for qualified students with disabilities under Section 504; early intervention services for eligible infants and toddlers with disabilities under Part C of the IDEA; programs for English learners; career and technical education; meals through the National School Lunch Program and School Breakfast Program; and other appropriate programs or services under the ESEA. (Section 723(d)(2)).
3. Professional development and other activities for educators and specialized instructional support personnel that are designed to heighten the understanding and sensitivity of such personnel to the needs of homeless children and youths, the rights of such children and youths under the McKinney-Vento Act, and the specific educational needs of runaway and homeless youths. (Section 723(d)(3)).
4. Referrals of eligible students to medical, dental, mental, and other health services. (Section 723(d)(4)).
5. Assistance to defray the excess cost of transportation not otherwise provided through Federal, State, or local funds, to enable students to remain in their schools of origin. (Section 723(d)(5)).
6. Developmentally appropriate early childhood education programs for preschool-aged homeless children that are not provided through other Federal, State, or local funds. (Section 723(d)(6)).
7. Services and assistance to attract, engage, and retain homeless children and youths, particularly homeless children and youths who are not enrolled in school, in public school programs and services provided to non-homeless children and youths. (Section 723(d)(7)).
8. Before- and after-school, mentoring, and summer programs for homeless children and youths in which a teacher or other qualified individual provides tutoring, homework assistance, and supervision of educational activities. (Section 723(d)(8)).

9. Payment of fees and costs associated with tracking, obtaining, and transferring records necessary to enroll homeless children and youths in school. The records may include birth certificates, immunization or other required health records, academic records, guardianship records, and evaluations for special programs and services. (Section 723(d)(9)).
10. Education and training for parents and guardians of homeless children and youths about the rights of, and resources available to, such children and youths, and other activities designed to increase the meaningful involvement of parents and guardians of homeless children or youths in the education of such children or youths.
11. Coordination between schools and agencies providing services to homeless children and youths in order to expand and enhance such services. Coordination with programs funded under the Runaway and Homeless Youth Act must be included in this effort. (Section 722(g)(5)(A)(i)).
12. Specialized instructional support services, including violence prevention counseling, and referrals for such services. (Section 723(d)(12)).
13. Programs addressing the particular needs of homeless children and youths that may arise from domestic violence and parental mental health or substance abuse problems. (Section 723(d)(13)).
14. Providing supplies to non-school facilities serving eligible students and adapting these facilities to enable them to provide services. (Section 723(d)(14)).
15. Providing school supplies, including those to be distributed at shelters or temporary housing facilities, or other appropriate locations. (Section 723(d)(15)).
16. Providing extraordinary or emergency services needed to enable homeless children and youths to attend school and participate fully in school activities. (Section 723(d)(16)).