



STATE OF MICHIGAN  
DEPARTMENT OF EDUCATION  
LANSING



JENNIFER M. GRANHOLM  
GOVERNOR

MICHAEL P. FLANAGAN  
SUPERINTENDENT OF  
PUBLIC INSTRUCTION

March 26, 2009

**MEMORANDUM**

TO: Local and Intermediate School District Superintendents  
Public School Academy Directors

FROM: Sally Vaughn, Ph.D. *Sally*  
Deputy Superintendent/Chief Academic Officer

SUBJECT: Regulatory Compliance of Education for Homeless Children and Youth  
Programs - School District Self-Assessment Tool

In our current economic climate, many students and their families are facing financial situations which may lead them to become eligible for homeless assistance services as is required of all public school districts, under Subtitle B of Title VII of the McKinney-Vento Homeless Assistance Improvements Act (Title X, Part C of the No Child Left Behind Act [NCLB] of 2001). As you are preparing for the 2009-2010 school year, you will need to ensure that your district Education for Homeless Children and Youth (EHCY) program is responsive to these needs.

The statutes for district EHCY programs are designed to ensure that all homeless children and youth have access to public school education and that state and local education agencies remove any barriers to their enrollment, attendance, participation, and academic success. The Michigan Department of Education (MDE) is responsible for the administration and supervision of all EHCY programs, whether or not such programs are funded by McKinney-Vento subgrants.

To assist in planning for effective EHCY programs, the MDE Homeless Education Program has provided a district self-assessment tool to aid Local Education Agencies (LEAs), Intermediate School Districts (ISDs), and Public School Academies (PSAs) in understanding requirements and determining compliance status with the McKinney-Vento Act. The attached tool lists specific responsibilities of non-grantee districts, referenced to the law, in addition to suggestions for compliance documentation. (Grant-funded districts have additional compliance and reporting requirements.) Space is provided for districts to include details and comments on each element of the EHCY program requirements. District Homeless Liaisons should be most familiar with these regulations and able to provide the necessary supporting documentation.

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Public school districts are required to complete this self-assessment, attach any pertinent documentation, and submit this information to the MDE Homeless Education Program office no later than April 10, 2009. Collection of this information is a requirement of the NCLB Act of 2001, Title X, Part C.

Experienced EHCY staff have been contracted by the MDE to provide technical assistance and monitoring for each of the five regions in the state. The regional staff will review the district self-assessments to determine technical assistance needs within each region and assess whether districts are in compliance with the requirements of the McKinney-Vento Act. Districts with high risk or high need will participate in monitoring site visits and technical assistance with regional staff. Off-site technical assistance will be offered to other non-funded districts.

If you have any questions about the EHCY program requirements or the self-assessment tool, please contact Pam Kies-Lowe, Homeless Education Consultant, in the Office of School Improvement, at 517-241-1162.

C: District Homeless Liaisons

Attachment



Return by April 30, 2009 to:  
 Homeless Education Program  
 Office of School Improvement  
 P.O. Box 30008  
 Lansing, MI 48909  
 Phone: 517-241-1162

**SCHOOL DISTRICT SELF ASSESSMENT: PART I  
 REGULATORY COMPLIANCE OF  
 EDUCATION OF HOMELESS CHILDREN AND YOUTH (EHCY) PROGRAM**

LEA NAME: _____	ISD NAME: _____	LEA #: _____	REGION #: _____
Authorized Representative/Title: _____		Liaison: _____	
Address: _____		City: _____	Zip Code: _____
E-mail: _____	Phone: _____	Ext.: _____	Fax: _____

The Michigan Department of Education is responsible for the administration and supervision of all EHCY programs, whether or not district receives funds under Subtitle B of Title VII of the McKinney-Vento Homeless Assistance Act. The purpose of this assessment is to monitor regulatory compliance of educational services to homeless children and youth in the district/service area.

REGULATORY COMPLIANCE NCLB (2001) Title X, Part C: McKinney-Vento Homeless Assistance Act, Title VII, Subtitle B	Suggested Supporting Documentation	Comments/Details	Compliance Status	
			YES	NO
<b>Local Homeless Liaison Designation and Duties</b>			<input type="checkbox"/>	<input type="checkbox"/>
1. The LEA has designated a Local Homeless Liaison to assist homeless students, including unaccompanied youth, in enrolling, attending, participating, and succeeding in school. [Sec. 722 (g)(1)(J)(ii), Sec. 722 (g)(6)(A)]	<ul style="list-style-type: none"> <li>Local Homeless Liaison assignment form, submitted to MDE Homeless Education Program office annually</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
2. The LEA must inform school personnel, service providers, and advocates working with the homeless of the duties of the Local Liaison. [Sec. 722 (g)(6)(B)]	<ul style="list-style-type: none"> <li>Documentation of materials used to inform these groups of Liaison duties</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
3. The Local Homeless Liaison ensures that:	<ul style="list-style-type: none"> <li>Documentation of referral and/ identification forms used by school personnel for homeless children/youth</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
(a) Children and youth in homeless situations are located, identified, and referred by school personnel to the Local Liaison. [Sec. 722 (g)(1)]			<input type="checkbox"/>	<input type="checkbox"/>
(b) Homeless students are immediately enrolled in and have full and equal opportunity to succeed in school. [Sec. 722 (g)(3)(C)(i), Sec. 722 (g)(3)E]	<ul style="list-style-type: none"> <li>Documentation of homeless students and the programs in which they participate</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
(c) Homeless families, children and youth receive all educational services for which they are eligible. (Head Start, Even Start, referrals to health, mental health, dental, etc.) [Sec. 722 (g)(1)]	<ul style="list-style-type: none"> <li>Documentation of accommodations made for homeless students</li> <li>Documentation of system to benefit student and learning environment</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>

REGULATORY COMPLIANCE NCLB (2001) Title X, Part C: McKinney-Vento Homeless Assistance Act, Title VII, Subtitle B	Suggested Supporting Documentation	Comments/Details	Compliance Status	
(d) Parents are informed of the educational rights of their children and are provided with meaningful opportunities to participate in the child's education. [Sec. 722 (g)(6)(B)]	<ul style="list-style-type: none"> <li>Documentation of services that homeless families are utilizing</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
(e) Liaison disseminates public notice of the educational rights of homeless students, containing current Liaison contact information, in all school buildings, as well as in places where homeless families/youth are likely to be present. [Sec. 722 (g)(3)E, Sec. 722 (g)(6)B]	<ul style="list-style-type: none"> <li>Posters, brochures, and flyers with distribution list</li> <li>Must include shelters, motels, soup kitchens, etc., and be available in Spanish and other prevalent languages, and geared for low literacy or other community need</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
(f) Homeless families/youth are fully informed of all transportation services to school (school of origin or school of residence) and assists in accessing the transportation services. [Sec. 722 (g)(6)(A)]	<ul style="list-style-type: none"> <li>Meeting minutes, posters, brochures, and flyers and the method of distribution</li> <li>Documentation of transportation forms or assistance provided</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
4. Homeless children and youth who do not have immunizations/medical records are assisted in obtaining necessary documentation, communications or medical records. [Sec. 722 (g)(3)(C)(iii)]	<ul style="list-style-type: none"> <li>Immunization records</li> <li>Liaison records of assisting children with immunizations and/or medical records</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
5. School personnel, service providers, community agencies and homeless advocates are informed of the services of the Liaison and how to refer students. [Sec. 722(g)(6)(B)]	<ul style="list-style-type: none"> <li>Shelter listings, homeless agency listings, social service agency listings, meeting minutes, agendas, training opportunities</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
6. Collaboration and coordination occurs with the state coordinator, local community, and school personnel for the education and services provided to homeless students. [Sec. 722(g)(6)(C)]	<ul style="list-style-type: none"> <li>Documentation of local liaison/district representation on committees, including meeting minutes and agendas</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
<b>Identification of Homeless Students</b>			<b>YES</b>	<b>NO</b>
7. LEAs must establish a procedure to locate and identify homeless children/youth of school age within the district, whether or not they are enrolled. [Sec. 722(g)(1)]	<ul style="list-style-type: none"> <li>Enrollment forms, agendas or meeting minutes to document communication or training with social welfare service agencies, shelters, churches, etc.</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
8. LEAs maintain a cumulative count of the number of homeless children and youth who reside in the district and who are enrolled or not enrolled in school. [Sec. 1111(a)(1)]	<ul style="list-style-type: none"> <li>Records accounting for homeless students in the following categories: Pre-K, K-5, 6-8, 9-12, other (SRSD, MSDS, etc.)</li> <li>Homeless students should be counted, whether being served or not</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
<b>School Selection for Homeless Students</b>				
9. Students are kept and served in their school of origin unless it is against the parent's/guardian's wishes. [Sec. 722 (g)(3)(B)(i)]	<ul style="list-style-type: none"> <li>Listing of homeless students with school of origin and current school attending</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>

<b>REGULATORY COMPLIANCE</b> <b>NCLB (2001) Title X, Part C: McKinney-Vento</b> <b>Homeless Assistance Act, Title VII, Subtitle B</b>	<b>Suggested Supporting Documentation</b>	<b>Comments/Details</b>	<b>Compliance Status</b>	
10. Students are allowed to attend their school of origin the entire time they are homeless and until the end of any academic year in which they become permanently housed. [Sec. 722 (g)(3)(A)(i)]; [Sec. 722(g)(3)(A)(i)(II)]	<ul style="list-style-type: none"> <li>Listing of former homeless students, school of origin, school attending and services provided, including after homelessness has ceased</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
11. Students who become homeless between academic years are allowed to attend the school of origin for the next academic year. [Sec. 722 (g)(3)(A)(i)(I)]	<ul style="list-style-type: none"> <li>Records of homeless students, as above</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
12. If students are sent to a school other than the school of origin or the school requested by the parent or guardian, written explanation must be provided to the parent/guardian, including information on their right to appeal the decision. [Sec.722 (g)(3)(B)(ii)]	<ul style="list-style-type: none"> <li>Written documentation of parent/guardian notification of denial of enrollment in school of origin or school requested</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
<b>Enrollment of Homeless Students</b>			<b>YES</b>	<b>NO</b>
13. Students are immediately enrolled in school, even if they lack records that are normally required for enrollment. [Sec. 722 (g)(3)(C)(i)]; [Sec. 722 (g)(3)(C)(iii)]	<ul style="list-style-type: none"> <li>Enrollment records, timeline showing date of receiving student and date enrolled</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
14. Records are obtained (process facilitated by Liaison) as soon as possible from the students' previous school. [Sec. 722 (g)(3)(C)(ii)]	<ul style="list-style-type: none"> <li>Written documentation of communication with other schools, including date(s) of contact</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
15. Student records (academic, immunization, medical, birth certificates, guardianship records, special evaluations) are maintained so they are readily available. [Sec. 722 (g)(3)(D)]	<ul style="list-style-type: none"> <li>Student records, record of providing copies to parents/guardians, documentation of fees paid to obtain any such records (i.e., birth certificates)</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
16. Homeless students are automatically qualified on enrollment to participate in free school nutrition programs. [Sec. 722 (g)(4)]; Child Nutrition & WIC Act, Sec. 104 (5)(A)(i), (iii), & (iv)] and [Sec. 107 (a)(3)(iv-vi)]	<ul style="list-style-type: none"> <li>Free and reduced meals forms, lists of homeless students utilizing free nutrition programs</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
17. LEA has reviewed and revised policies and procedures which could act as barriers to the enrollment, attendance, participation, and success of homeless children and youth. [Sec.722 (g)(1)(G)]	<ul style="list-style-type: none"> <li>Board minutes, revised policies and procedures</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
18. Homeless families/youth are provided with written information on their right to dispute placement and enrollment decisions, as well as the procedure for doing so. [Sec. 722 (g)(3)E and (g)(3)(B)(ii)]	<ul style="list-style-type: none"> <li>Documents listing rights of homeless to dispute enrollment decisions, dispute resolution policy, and written process provided to parents/youth</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>

REGULATORY COMPLIANCE NCLB (2001) Title X, Part C: McKinney-Vento Homeless Assistance Act, Title VII, Subtitle B	Suggested Supporting Documentation	Comments/Details	Compliance Status	
			YES	NO
<b>Dispute Resolution Procedures for Homeless Students</b>				
19. A written process for the prompt resolution of disputes regarding the educational placement of homeless students is provided to parents/youth. (See also #13, above.) [Sec. 722 (g)(3)E]	<ul style="list-style-type: none"> <li>Dispute resolution policy and written process provided to parents/youth</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
20. Enrollment disputes are initially mediated by the Local Liaison. [Sec. 722 (g)(3)(E)]	<ul style="list-style-type: none"> <li>Documentation of dispute resolution process, beginning with Liaison, through the SEA level</li> </ul>			
21. A homeless student is immediately enrolled in the school of choice pending the resolution of any dispute. [Sec. 722 (g)(3)E]	<ul style="list-style-type: none"> <li>Documentation of dispute resolution process</li> </ul>			
<b>Transportation for Homeless Students</b>				
22. Homeless families/youth are fully informed of all transportation services to school (of origin, choice, or residence) and assists in accessing the transportation services. [Sec. 722 (g)(6)(A)]	<ul style="list-style-type: none"> <li>Meeting minutes, posters, brochures and flyers, and the method of distribution</li> <li>Documentation of transportation forms or assistance provided</li> </ul>			
23. Transportation is provided to the school of origin at the request of the parent. [Sec.722 (g)(1)(J)(iii)]	<ul style="list-style-type: none"> <li>LEA and/or Liaison transportation records</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
24. If transportation to school of origin is across district lines, LEAs involved are responsible for sharing costs. If LEAs cannot agree, they must share the costs equally. [Sec. 722 (g)(1)(J)(iii) and (g)(4)(A)(II)]	<ul style="list-style-type: none"> <li>Records of transportation cost-sharing with contiguous LEAs</li> </ul>			
<b>Segregation of Homeless Students/Programs</b>				
25. LEA has adopted policies and practices to ensure that homeless children and youth are not segregated or stigmatized on the basis of their homeless status. [Sec. 722 (g)(1)(J)(i)]	<ul style="list-style-type: none"> <li>Documentation of how the homeless program operates in relation to the rest of the school system</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
<b>Unaccompanied Homeless Youth</b>				
26. LEA assures that unaccompanied youth have equal access to all programs administered by the LEA/SEA. (This applies to all federal, state, local public before- and after-school programs, etc.) [Sec.722 (g)(3)(B)(iii)]	<ul style="list-style-type: none"> <li>Documentation of assistance with enrollment of unaccompanied youth</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
27. The Local Liaison acts as <i>parentis in loco</i> to assist unaccompanied youth in school selection/enrollment decisions. [Sec.722 (g)(3)(B)(iii)]	<ul style="list-style-type: none"> <li>Documentation of assistance with enrollment of unaccompanied youth</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
28. The Local Liaison assists unaccompanied youth in requesting transportation to the school of origin. [Sec. 722 (g)(1)(J)(iii)]	<ul style="list-style-type: none"> <li>Documentation of assistance with transportation for unaccompanied youth, transportation records</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>

<b>REGULATORY COMPLIANCE</b> <b>NCLB (2001) Title X, Part C: McKinney-Vento</b> <b>Homeless Assistance Act, Title VII, Subtitle B</b>	<b>Suggested Supporting Documentation</b>	<b>Comments/Details</b>	<b>Compliance Status</b>	
<b>Preschool-Aged Homeless Children</b>			<b>YES</b>	<b>NO</b>
29. LEA assures that homeless children have equal access to preschool programs administered by the LEA/SEA. (This applies to all federal, state/local public before- and after-school programs, including Head Start, Even Start, etc.) [Sec.722 (g)(3)(B)(iii)]	<ul style="list-style-type: none"> <li>Documentation of assistance with enrollment of homeless children in such programs</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
<b>Homeless Students with Disabilities</b>			<b>YES</b>	<b>NO</b>
30. Children with disabilities who are homeless have the same right to FAPE under Part B as non-homeless children with disabilities. Homeless children with disabilities and their parents are subject to the same IDEA protections and requirements as children with disabilities and their parents who are not homeless. [IDEA, Part B-34 CFR, Sec. 104.33 (b)(2)]	<ul style="list-style-type: none"> <li>Records of homeless students evaluated for and placed in special education or related services</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
<b>Comparable Services and Academic Standards</b>			<b>YES</b>	<b>NO</b>
31. LEA assures that homeless children/youth are provided services/programs comparable to those received by other students in the LEA, including transportation, special education, Title I, advanced/ accelerated, ELL, vocational/tech. education, school nutrition, before- and after-school, and preschool programs, etc. [Sec. 722 (g)(4) and (g)(1)(F)]	<ul style="list-style-type: none"> <li>LEA Consolidated Plan, including details for Homeless Education Plan</li> <li>Records of homeless students in each of these programs/services</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
32. LEA assures that homeless children/youth have access to education and other services needed to ensure that they have the opportunity to meet the same challenging state standards that all students are expected to meet. [Sec. 1111 (a)(1)]	<ul style="list-style-type: none"> <li>LEA Homeless Education Plan</li> <li>Records of homeless students</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
33. Parents/guardians/youth are informed of educational and related opportunities available to all LEA's students. [Sec. 1111 (a)(1)]	<ul style="list-style-type: none"> <li>Documentation of informational items distributed on such opportunities</li> </ul>			
<ul style="list-style-type: none"> <li><b>Title I, Part A Funding and Coordination (applies to all LEAs receiving funding under Title I, Part A)</b></li> </ul>			<b>YES</b>	<b>NO</b>
34. LEA has a local plan describing the coordination of services provided to homeless children/youth, including services provided from the Title I, Part A Set-Aside. [Sec. 1112 (a)(1), Sec. 1112 (b)(1)(O)]	<ul style="list-style-type: none"> <li>LEA Consolidated Plan, including details for Homeless Education Plan</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
35. LEA reserves a specified amount of Title I, Part A funding to provide comparable services for homeless children not attending Title I-funded schools, including children in shelters and other eligible locations. [Sec.1113 (c)(3)(A)]	<ul style="list-style-type: none"> <li>Documentation of set aside funding, method/formula used to determine amount, and details of services provided with Title I, Part A funds</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>

REGULATORY COMPLIANCE NCLB (2001) Title X, Part C: McKinney-Vento Homeless Assistance Act, Title VII, Subtitle B	Suggested Supporting Documentation	Comments/Details	Compliance Status	
36. LEA assures that services provided to homeless students through Title I supplement and do not supplant district services. [Sec. 723 (a)(3), Sec. 1111 (a)(1)]	<ul style="list-style-type: none"> <li>Records of homeless children in non-Title I buildings and the services received</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
37. LEA assures access to Title I services by homeless students in all its public schools, whether or not Title I funded, including services in a Targeted Assistance School Program. [Sec. 115 (b)(2)(E)]	<ul style="list-style-type: none"> <li>Records of homeless children in Title I and non-Title I buildings and the services received</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
38. Title I and Homeless Education programs are coordinated to meet the needs of homeless children and youth. [Sec. 112 (b)(1)(E)]	<ul style="list-style-type: none"> <li>Documentation of meetings between Title I and Local Liaison to coordinate programming</li> </ul>		<input type="checkbox"/>	<input type="checkbox"/>
<b>Coordination with LEAs and Agencies</b>			<b>YES</b>	<b>NO</b>
39. LEA coordinates services with local social services and other agencies providing assistance to homeless children and youth. This coordination is to ensure that homeless children have access and proximity to all education and support services as well as to raise the awareness of school personnel and service providers.	<ul style="list-style-type: none"> <li>Documentation of coordination with social service agencies and other agencies providing assistance to the homeless</li> </ul> [Sec. 722 (g)(5)(A)(i) and (g)(5)(C)]		<input type="checkbox"/>	<input type="checkbox"/>
40. LEAs are required to coordinate services with other LEAs on inter-district issues. This coordination is to ensure that homeless children have access and proximity to all education and support services as well as to raise the awareness of school personnel and service providers.	<ul style="list-style-type: none"> <li>Documentation of coordination with other LEAs regarding services to homeless children and youth</li> </ul> [Sec. 722 (g)(5)(A)(ii) and (g)(5)(C)]		<input type="checkbox"/>	<input type="checkbox"/>
41. Liaison coordinates with state and local housing agencies to minimize educational disruption for children and youth who become homeless, and to ensure that homeless children have access and proximity to all education and support services as well as to raise the awareness of school personnel and service providers.	<ul style="list-style-type: none"> <li>Documentation of coordination with housing agencies</li> </ul> [Sec. 722(g)(5)(B)] and [Sec. 722(g)(5)(C)]		<input type="checkbox"/>	<input type="checkbox"/>

**Required Names:**

\_\_\_\_\_  
LEA Homeless Education Liaison

\_\_\_\_\_  
LEA Superintendent

\_\_\_\_\_  
MDE Monitor

**Required Signatures:**

\_\_\_\_\_  
Signature of Homeless Education Liaison

\_\_\_\_\_  
Signature of LEA Superintendent

\_\_\_\_\_  
Signature of MDE Monitor

\_\_\_\_\_  
Date Signed

\_\_\_\_\_  
Date Signed

\_\_\_\_\_  
Date Signed