



STATE OF MICHIGAN
DEPARTMENT OF EDUCATION
LANSING



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MEMORANDUM

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

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

SUBJECT: Accountability Requirements for Reporting of Homeless Students

Background

The U.S. Department of Education's (USED) Office of Elementary and Secondary Education requires State Education Agencies (SEAs) to submit information to the USED to determine the extent to which states ensure homeless children and youth have access to a free, appropriate public education under Title X, Part C, of the No Child Left Behind Act of 2002.

As you know, the purpose of the Education for Homeless Children and Youth (EHCY) Program, as defined in the McKinney-Vento Homeless Assistance Improvements Act of 2002, is to improve the educational outcomes for children and youth in homeless situations. The statutes for this program are designed to ensure that all homeless children and youth have access to public school education, and that States and Local Education Agencies (LEAs) review and revise policies and regulations to remove any barriers to their enrollment, attendance, and academic success.

Accountability Requirements

Accountability requirements for SEAs and LEAs have been strengthened in this program area, along with many other educational program areas. Accurate reporting of EHCY data is critical to continued federal funding levels. These LEA data are included in the Consolidated State Performance Report (CSPR) for every SEA. Some EHCY data are pre-populated by ongoing submissions to the ED*Facts* report. These data are drawn at any time during the reporting period directly from the Michigan Student Data System (MSDS), formerly the Single Record Student Database (SRSD). MSDS Field 34 is specifically reserved for the entry of the nighttime residence of homeless students. (See revised definitions of codes in Attachment.)

In a year-end MSDS report, all homeless children and youth enrolled in school programs or receiving McKinney-Vento services in a year's time are required to be reflected in LEA data, whether or not the LEA receives McKinney-Vento funds.

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Local homeless liaisons should include nighttime residence data in MSDS Field 34 for any student meeting homeless criteria, including those enrolled in:

- Summer school
- LEA sponsored preschool programs
- Year-round educational programs
- Some ungraded special education programs
- LEA sponsored GED and adult education programs for students age-eligible for free, appropriate, public education

In the current economic climate, counts are expected to increase substantially, so it is essential that LEA reports are accurate in order to maintain funding for the state's programs.

Since all LEAs receiving federal funds through Title I, Part A are required to reserve and spend Title I-A funds to serve homeless students not enrolled in Title I schools, accurate reporting of homeless students provides accountability for these expenditures as well. Coordination of these funds is mandated in McKinney-Vento legislation and must be documented in the mandated LEA Homeless Education Plan. [McKinney-Vento Act, 2002, Subtitle VIIB, Section 722 and ESEA Section 1111(a)(1)].

In addition, the Michigan Department of Education (MDE) homeless program office will require complete, timely, and accurate reporting for the continued funding in the second and third years of the 2009-2012 McKinney-Vento Homeless Education 3 year grant funding cycle.

In the past, Michigan LEAs have drastically under-reported in the SRSD for homeless students served. For example, the collective total of homeless students reported in the current MSDS (SRSD) is less than one-half (1/2) of the total number of homeless students reportedly being served in the grant information provided by the grantees. This is a serious difference. We have previously been cited by the USED for inaccurate or incomplete reporting methods. I cannot overstate the importance of accurate reporting of EHCY data and its impact on continued funding of the Homeless Education program.

Glossary of Terms

A Glossary of Homeless Education Terms is attached to this memorandum to facilitate accurate and complete reporting of homeless students by all LEAs.

Your commitment to serving Michigan's most vulnerable students is appreciated and we encourage you to share this information with your LEA homeless liaison and data reporting staff. If you have any questions regarding accountability and reporting requirements, please contact Pam Kies-Lowe, Homeless Education Consultant, at 517-241-1162 or email to kies-lowep@michigan.gov.

Attachment

GLOSSARY OF HOMELESS EDUCATION TERMS

Adapted from the National Center for Homeless Education at the SERVE Center, University of North Carolina at Greensboro, *Guide for Federally Required State Data Collection for the McKinney-Vento Homeless Education Assistance Improvements Act of 2001, September 2008*

Age 3 through 5 Not Kindergarten: This includes any preschool-aged (3-5) homeless child who is enrolled in a LEA-funded preschool program or enrolled in a preschool program with which the LEA is a partner administratively or financially or has any accountability in serving the children (see definition of *Served*). Children to be included may be attending a specific location or participating in a home-based program. See definition of *Public Preschool Program* for examples of preschool programs and services.

Awaiting Foster Care Placement: The McKinney-Vento Act does not define this term; however, many state and local child welfare agencies and education agencies have developed definitions of who is considered to be “awaiting foster care placement” in their state or locality. State and/or local definition should be the guide for determining this classification. Michigan’s definition is that a student awaiting foster care placement is defined as homeless under the McKinney-Vento Homeless Assistance Act. Additionally, a student placed in a foster care home is considered temporarily placed, thus eligible for McKinney-Vento services, until that student is in the foster care home for a minimum of six (6) months.

Barrier: For the purposes of federal data collection, a barrier is defined as a situation in which difficulties or conflicts have arisen related to the enrollment, attendance, and provision of services for homeless students. Included would be those difficulties that have required the intervention of the local liaison or other homeless education staff to resolve. This information should be available from the technical assistance logs of homeless education staff.

CSPR Report: The Consolidated State Performance Report (CSPR) is required of all states and includes data that tracks progress in implementing the No Child Left Behind Act. It is one of the components of data collection for *EDFacts*. Data supplied by states for the CSPR report include data on adequate yearly progress, state performance assessments, highly qualified teachers, and school choice options.

Doubled-Up: The McKinney-Vento Act defines this term as “sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason” [725(2)(B)]. * This classification particularly requires a case-by-case determination, keeping in mind that the determining factor is whether the accommodation is a “fixed, regular, and adequate nighttime residence” (see definition of same).

EDEN: Education Data Exchange Network is a centralized portal through which states submit their educational data to the U.S. Department of Education. EDEN is comprised of three main components: (1) The EDEN Submission System (ESS), an electronic data system capable of receiving data on over 100 data groups at the state district and local levels; (2) the EDEN Survey Tool (EST), which collects data supplementary to the ESS data; and (3) the EDEN staging database, a holding area for newly submitted data.

EDFacts: *EDFacts* centralizes performance data supplied by K-12 state education agencies (SEAs) with other data assets, such as financial grant information, with the Department to enable better analysis and use in policy development, planning, and management. *EDFacts* relies on the Education Data Exchange Network (EDEN) for data submission.

Eligibility: To be eligible for services according to the McKinney-Vento Act, a homeless student must meet the Act's definition of homeless. The McKinney-Vento Act defines "homeless children and youths" as "individuals who lack a fixed, regular, and adequate nighttime residence." Lacking any one of these three conditions would make a child eligible. In other words, if the residence is not fixed, regular, or adequate, it is considered a homeless situation.

Enrolled: The McKinney-Vento Act definition of "enrolled" is those students attending classes and participating fully in school activities. For data collection purposes, enrolled includes any child for whom a current record exists.

Fixed, Regular and Adequate: According to the McKinney-Vento Act, individuals who lack a fixed, regular, and adequate residence are considered homeless. A "fixed residence" is one that is stationary, permanent, and not subject to change. A "regular residence" is one that is used on a regular (i.e. nightly) basis. An "adequate residence" is one that is sufficient for meeting both the physical and psychological needs typically met in home environments.

IDEA: The Individuals with Disabilities Education Act (IDEA) is a law ensuring services to children with disabilities throughout the nation. IDEA governs how states and public agencies provide early intervention, special education, and related services to more than 6.5 million eligible infants, toddlers, children, and youth with disabilities. For the purpose of data collection, Children with Disabilities (IDEA) are defined as any child served under IDEA that has a current Individualized Education Program (IEP). This does not include students receiving accommodations under a 504 plan.

LEP: Refers to national origin minority individuals who are "limited English proficient" (LEP); that is, they cannot speak, read, write, or understand the English language at a level that permits them to interact effectively with health care providers and social service agencies. For the purposes of data collection, an LEP student is defined as any child who has been identified by the district as needing English Language Learner (ELL) services.

McKinney-Vento Subgrant: Funds that State Education Agencies (SEAs) make available to an LEA for the purpose of facilitating the enrollment, attendance, and success in school of homeless children and youth [723(a)(1)].*

Migratory Children/Youth: To be included in the homeless education federal data collection, migratory children/youth are those who have Certificates of Eligibility and fit the McKinney-Vento definition of homeless. These children are identified through coordination with the migrant education program.

Primary Nighttime Residence: The type of residence (e.g. shelter, hotel, doubled-up in the home of a friend or relative) where a homeless child or unaccompanied youth was staying at time of enrollment or type of residence where a currently enrolled child or youth was staying when he or she was determined eligible for McKinney-Vento services.

A homeless student's Primary Nighttime Residence is reported in Field 34 of the SRSD. Options for Field 34 in the SRSD are to report the living situation of the student during the duration of homelessness, even if the student has since gained permanent housing. Michigan reporting codes are included within federal reporting categories; they do not match the federal reporting categories. **Field 34 codes 6, 7, and 8 (shown below) are no longer to be used in reporting residence codes for homeless students since these are not included in any federal reporting guidelines.**

- | | |
|---|-----------------------|
| 6 | Other location |
| 7 | Temporary arrangement |
| 8 | Unknown |

UPDATED Michigan Codes for SRSD Field 34 - (see specific definitions in this Glossary)

UPDATED for 2009-2012 to align with federal reporting guidelines

- 1 Shelters** — are defined as supervised publicly or privately operated facilities designed to provide temporary living accommodations.
NOTE: Youth shelters and victim shelters (previously separate categories #2 and #3 in the SRSD codes) are now included within this category.
- 2 Transitional housing** — is temporary accommodation for homeless individuals and families provided as a step to permanent housing. Residents of transitional housing continue to be considered homeless until they move into permanent housing.
- 3 Awaiting Foster Care Placement** — is defined in Michigan as Michigan's definition is that a student awaiting foster care placement is defined as homeless under the McKinney-Vento Homeless Assistance Act. Additionally, a student placed in a foster care home is considered temporarily placed, thus eligible for McKinney-Vento services, until that student is in the foster care home for a minimum of six (6) months. (Also see previous definition in this Glossary.)
- 4 Doubled-Up** — sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason. This classification requires a case by case determination; keeping in mind the determining factor is whether the accommodation is a "fixed, regular and adequate nighttime residence."
- 5 Hotel/Motel** — a hotel is a building or commercial establishment where people pay for lodging; a motel is a hotel intended to provide short-term lodging for traveling motorists, usually situated close to a highway and having rooms accessible from the parking area.
- 6 Unsheltered** — includes cars, parks, campgrounds, temporary trailers, abandoned buildings, and substandard housing. Substandard housing may be determined by local building codes, community norms, and/or as a case by case determination as to whether the accommodation is a "fixed, regular, and adequate nighttime residence."
NOTE: Because FEMA trailers are considered temporary trailers, FEMA trailers primary nighttime residence category would be "Unsheltered."

Proficiency Level: According to the No Child Left Behind Act, Sec. 200.8(2) proficiency level is actual student academic achievement measured against the state's academic achievement standards (each state sets its own achievement standards and measures).

Public Preschool Program: This pertains to preschool programs funded by an LEA or preschool programs with which the LEA is a partner administratively or financially or has any accountability in serving the children (preschool-aged (3-5) homeless children) (see the Glossary for definition of Served). Children to be included may be attending at a specific location or participating in a home-based program.

Examples of public preschool programs would include:

- LEA pre-K mandatory or universal pre-K
- LEA pre-K non-mandatory
- Head Start program receiving funding or support from the LEA (whether located in the schools or community-based organizations or home-based services)
- Preschool special education services that are supported in any way by the LEA (may be arranged by a county agency at home or at an approved special education preschool not operated by a school district)

- Preschool-aged children enrolled in Title I, Even Start, or any other state-funded preschool services that are administered or supported by the LEA
- Children who receive home-based services, such as Parents as Teachers or Parent/Child Home Program that are funded and administered by an LEA

School of Origin: It is defined as the school that the student attended when permanently housed or the school in which the student was last enrolled.

School Year: It is the period of time required by state or local policy in which students must attend school. For the purposes of this data collection, a school year is determined to be the period July 1 through June 30.

School-Aged: This is the age determined by state law for compulsory education.

Served: Includes homeless children who have been served in any way through McKinney-Vento funds. Services would include both direct services, as outlined in the McKinney-Vento Act (Sec. 723), and indirect services, such as those provided by a staff member whose position is supported through McKinney-Vento funds.

Shelter: This is a supervised publicly or privately operated facility designed to provide temporary living accommodations.

Substandard Housing: The definition of substandard housing is determined by local building codes, community norms, and/or a case-by-case determination as to whether the accommodation is "fixed, regular, and adequate."

Transitional Housing: This is a temporary accommodation for homeless individuals and families provided as a step to permanent housing. Residents of transitional housing continue to be considered homeless until they move into permanent housing.

Unaccompanied Youth: A homeless unaccompanied youth is a youth who is not in the physical custody of a parent or guardian and who fits the McKinney-Vento definition of homeless. There is no age range specified for an unaccompanied youth in the law. The upper age range is determined by what a state defines as school aged, unless the child is in special education, in which case, the upper age range is twenty-one (21) years of age. There is no lower age range.

Ungraded: Means that the students are served in an educational unit that has no separate grades or standard grade designation. For example, some schools have primary grade groupings that are not traditionally graded or ungraded groupings for children with learning disabilities. In some cases, ungraded students may include children receiving special education services or transitional bilingual students. Children attending summer school may be included in the ungraded category. Youth who are working on a (General Education Development (GED) or taking Adult Basic Education (ABE) classes through or supported by a public K-12 institution or LEA should be included in this category.

Unsheltered: This includes cars, parks, campgrounds, temporary trailers, FEMA trailers, abandoned buildings, and substandard housing. Unsheltered situations require a case-by-case determination as to whether the accommodation is "fixed, regular, and adequate."

Note: Because FEMA trailers are considered temporary trailers, FEMA trailers primary nighttime residence category would be "Unsheltered."^{*}

^{*} Citations in brackets refer to McKinney-Vento statutes.

Disclaimer: Some definitions included are not part of the McKinney-Vento statute, ESEA 1965, or federal guidance. They are provided for the purpose of clarifying the data elements required for the federal data collection on homeless education programs. These definitions enable submission of consistent data based on the same interpretation of terminology by LEAs and SEAs.