



STATE OF MICHIGAN
DEPARTMENT OF EDUCATION
LANSING

GRETCHEN WHITMER
GOVERNOR

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STATE SUPERINTENDENT

MEMORANDUM

DATE: October 5, 2023

TO: Local Education Agency Homeless Liaisons

FROM: Michelle Williams, State Coordinator for Homeless Education
Special Populations Unit, Office of Educational Supports
Division of Educator, Student, and School Supports

SUBJECT: Homeless Education Requirements (Expanded Version)

The Homeless Education Program supports students experiencing homelessness by removing barriers to help them be successful in all aspects of school participation. To meet federal requirements, local education agencies (LEAs), traditional public school districts, intermediate school districts (ISDs) and public school academies (PSAs), must comply with each of the bulleted actions outlined in this memo. These efforts align with the Michigan Department of Education's (MDE) [Top 10 Strategic Education Plan](#), goal 3: improve the health, safety, and wellness of all learners.

This expanded memo includes additional information and resources and is written to support district administrators and local education agency (LEA) Homeless Liaisons as they implement federal requirements. A focused version of this memo was shared with superintendents through MDE's Thursday communications. This memo is the expanded version referenced in that focused memo.

The Homeless Education Program is intended to support students experiencing homelessness by removing barriers to help them be successful in all aspects of school participation. Under the [McKinney-Vento \(MV\) Homeless Assistance Act](#), the term "homeless children and youth" means individuals who lack a **fixed, regular, and adequate nighttime residence**. This specifically includes children and youth who fall into one of the categories below:

- who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason
- [who] are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations
- [who] are living in emergency or transitional shelters
- [who] are abandoned in hospitals

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- [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 within the meaning of section 103(a)(2)(C)
- [who] are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings
- migratory children who are living in the above situations [42 U.S.C. § 11434a(2)]

In lieu of “homeless children and youth,” MDE uses “children and youth experiencing homelessness” to refer to this group of eligible children. Children and youth are the focus. Homelessness or housing instability is the circumstance they are experiencing. The Homeless Education team appreciates your efforts to support this important distinction.

To comply with federal requirements, LEAs must:

➤ **Designate an LEA Homeless Liaison**

- Every LEA, ISD and PSA must designate an LEA Homeless Liaison. This individual must be identified in the [Educational Entity Master](#) (EEM). The LEA must update the contact information if the designee changes. [\[42 U.S.C. §11432\(e\)\(3\)\(c\)\(IV\)\]](#)
- Every LEA Homeless Liaison who is selected to fulfill this role must have the capacity, knowledge, and time, to perform the required duties under the law. [\[42 U.S.C. §11432\(g\)\(6\)\(A\)\]](#) A free resource for considering the capacity to fulfill the required duties is linked here: [Homeless Education: Assessing Liaison Capacity](#).
- All LEA Homeless Liaisons must complete the required SEA training. In Michigan, this training is offered through an asynchronous online module that concludes with an assessment. The training module takes approximately 4 hours to complete. A minimum score of 80% must be obtained on the assessment for successful completion. LEA Homeless Liaisons who completed the course in a prior are not required to repeat the course but may do so as a refresher. SCHECHs are provided for successful course completion. [\[42 U.S.C. §11432\(g\)\(1\)\(J\)\(iv\)\]](#)

Homeless Liaisons needing to complete training are invited to register directly with the vendor.

Instructions:

1. To register, select the link: mckinney-vento.org/register.
2. Type in your name, and email address.
3. Select “I am a homeless project coordinator”.
4. Select your location (State, County/Region, School District).
5. Select “I am a school liaison.”
6. Submit your form by clicking “Create Account.”
7. Once the module is completed, email a copy of the Certificate of Completion to MDE’s Homeless Education team’s email address: McKinney-Vento@michigan.gov.

After your successful registration, please wait for the system administrator approval of your liaison account. Once approved, you will receive an email containing additional instructions on how to set your password and login to your liaison courses. If you have any questions regarding the registration, use of the module, or login and password information, please contact the McKinney-Vento Learning LLC support team at Support@mckinney-vento.org.

➤ **Protect Student Rights**

- Students experiencing homelessness have certain rights and are eligible for certain protections that must be safeguarded by the LEA. These rights and protections include:
 - immediate enrollment and attendance in classes (*regardless of missing paperwork*)
 - preference for school of origin during best interest placement decisions
 - transportation to school of origin, if requested
 - access to services comparable to other students
 - removal of barriers to full access and school participation
 - written determinations on a student's eligibility under the McKinney-Vento Act
 - information and support for dispute resolution
 - unaccompanied homeless youth protections
 - support from an identified and trained Homeless Liaison who serves as an advocate for the student

The United States Department of Education provides the following resource for school administrators and LEA Homeless Liaisons as they work to ensure these rights and protections are supported by local policies and procedures:

[Supporting the Success of Children and Youth Experiencing Homelessness](#).

- Information on student rights and protections under the McKinney-Vento Homeless Assistance Act should be posted throughout your school and in the community where families experiencing homelessness may frequent. Ensure the contact information for your Homeless Liaison is included on the posters. A limited number of posters may be ordered **for free** from the National Center for Homeless Education. [NCHE Order Form Link](#)
- Information regarding the housing status of students experiencing homelessness is specifically protected in the McKinney-Vento Homeless Assistance Act [[42 U.S.C. §11432\(g\)\(3\)\(G\)](#)] and under the Family Educational Rights and Privacy Act ([FERPA](#)). Safeguards to ensure confidentiality and privacy of shared data or information should be in place and staff should be informed of this protection.

➤ **Utilize the State's Dispute Resolution Process**

- Every LEA must have a locally adopted dispute resolution process based on the MDE Dispute Resolution Process [[42 U.S.C. §11432\(g\)\(3\)\(E\)\(i-iv\)](#)] on file and ready to use should the need arise. The MDE process as well as sample forms are available for download and local adoption on the MV Homeless Education website, www.michigan.gov/homeless under Dispute Resolution Process heading.

- A sample [Written Notification of MV Enrollment Decision Form](#) is also provided on our website. LEAs may adopt this version or modify it as needed.

➤ **Leverage the Title I, Part A, Homeless Set Aside**

The Title I, Part A requires all LEAs to reserve funds to ensure comparable services for children and youth experiencing homelessness and as determined by a needs assessment, and to reserve funds to provide children and youth experiencing homelessness with services not ordinarily provided to other students. [[Section 1113\(c\)\(3\) ESEA](#)]

The Office of Educational Supports (OES) provides a [6-Step Process for Guidance on Determining Title I, Part A Homeless Set Aside Reservations](#). A [worksheet](#) is also provided for LEA during the identification of needs and program planning. LEAs must, at minimum, engage the LEA Homeless Liaison and the Title I Program Lead in this conversation.

➤ **Consider Data when Determining the Title I, Part A Homeless Set-Aside Amount**

LEAs will use data reported in Michigan Student Data System (MSDS) to reviewing the identification of students experiencing homelessness and mischooldata.org to analyze on attendance and achievement outcomes for students experiencing homelessness. This data along with other information from the LEA Homeless Liaison to determine if the district is accurately identifying all eligible students and to inform the needs assessment process.

LEAs may compare identification rates to national or state averages or consider other local data related poverty. As a point of comparison, LEAs may use either of the following percentages when considering their identification rates of eligible students experiencing homelessness:

- 5.5% of the LEA's Free & Reduced Lunch counts (FRL)
- 2.5% of the LEA's full enrollment

These comparison points will also assist the LEA if the LEA has **not** identified any students experiencing homelessness and has a zero count. With this point of comparison, LEAs may consider the following questions:

- What does housing instability look like for students in our community?
- Which community agencies can we partner with to deepen our understanding of homelessness in our area?
- What insights can we learn from the district's Homeless Liaison, the MV Regional Grant Coordinator, and other consortium member districts?
- What is the root cause of the lack of identification?

➤ **Support Students with the Free Application for Federal Student Aid (FAFSA)**

The MV Homeless Assistance Act requires each Homeless Liaison to ensure that unaccompanied homeless youth (UHY) are informed of their status as independent students and can obtain assistance from the LEA's Homeless Liaison to receive verification of such status for purposes of the Free Application for Federal Student Aid (FAFSA) [\[42 U.S.C. § 11432\(g\)\(6\)\(A\)\(x\)\(III\)\]](#). This independent status for UHY allows students to submit the FAFSA without a parent's signature or information about the parent's income on the FAFSA. LEA Homeless Liaisons may be asked to verify a youth's status as UHY.

- Federal Student Aid Resource: [Federal Student Aid and Homeless Youth Questions & Answers](#)
- National Association for the Education of Homeless Children and Youth Resource: [Helping Unaccompanied Homeless Youth Access College Financial Aid](#)
- SchoolHouse Connection Resource: [The FAFSA Simplification Act: Youth Experiencing Homelessness and Youth with Experience in Foster Care](#)
- Federal Student Aid Resource: [FAFSA® Simplification Act Changes for Implementation in 2023-24](#)

➤ **Participate in and Provide Professional Learning and Resources**

- LEA Homeless Liaisons must provide professional learning and/or training within their LEA. Training will include information on immediate enrollment, transportation, as well as the rights and protections for children and youth experiencing homelessness.
- MDE awards grant projects to consortia of LEAs and ISDs to support students experiencing homelessness and the LEA Homeless Liaisons. A primary goal of these projects is to provide a cascade of support at the regional and local level to assist with the identification of students, as well as connections and collaboration with other agencies that serve families and individuals experiencing homelessness. Looking for the project in your region? Contact information for the [MV Regional Grant Coordinators](#)
- MDE offers professional learning opportunities for LEA Homeless Liaisons:
 - MDE's McKinney-Vento Homeless Education [website](#) contains resources and links to support the implementation of homeless education programs.
 - The [Special Populations Conference](#), held October 25th & 26th, 2023, at the Michigan State University Kellogg Conference Center in East Lansing. A preconference focused on Homeless Education will also be offered on October 24, 2023.
 - Special Webinar Series, titled "This is How We Do It". These 90-minute sessions are held every other month, and offer an opportunity for LEA Homeless Liaisons to collaborate across the state with other Homeless Liaisons and grant coordinators while learning ways to support students. Email McKinney-Vento@michigan.gov for flyer and registration information.
 - Nov. 28 Personal Curriculum/Credit Recovery/Credit Accrual–Let's Give Credit Where Credit is Due!
 - Jan. 16 Pupil Accounting Ensuring You Know the Rules and Flexibility

- Mar. 19 College Access/FAFSA Supporting Youth in Their Next Steps
- May 14 The Intersection of Migrant and Homeless Education
- **Office Hours Schedule**—bring your McKinney-Vento Homeless Education questions, scenarios, and wonderings and join us as we learn together and support each other:
 - [First Thursday of the Month at 9:00 am EST](#)
 - [Third Tuesday of the Month at 3:00 pm EST](#)

Other helpful information and links:

- State Community Partner Connections
 - Learn more about Michigan's [Campaign to End Homelessness](#)
 - Connect to your local Continuum of Care through Michigan's State Housing Development Authority [Housing Assessment and Resource Agency](#) (HARA) contacts
- Connect with us! MDE's Homeless Education Team:
 - Email: McKinney-Vento@michigan.gov
 - Phone: 517- 241-6977
 - Website: www.michigan.gov/homeless