Federal Program Monitoring
School Year 2015-2016

Title X, Part C
McKinney-Vento Homeless Assistance Act
Education for Homeless Children and Youth Program

Project HOPE-Virginia
The College of William and Mary
P.O. Box 8795
Williamsburg, VA 23187-8795

Contact Information
Patricia Ann Popp, Ph.D.
pxpopp@wm.edu

Phone: 757-221-7776
Fax number: 757-221-5300
I. INTRODUCTION

Monitoring the implementation of federal programs and the use of federal program funds is a required function of the Virginia Department of Education (VDOE) and Project HOPE-Virginia, as its agent for homeless education. This document describes the purpose, rationale, and process used by Project HOPE-Virginia in monitoring compliance with Title X, Part C of the Elementary and Secondary Education Act (ESEA), the Education for Homeless Children and Youths Program.

Definition and Purpose of Monitoring

Monitoring is the regular and systematic examination of local educational agency (LEA) administration and implementation of a federal education grant, contract, or cooperative agreement administered by the state. Monitoring of programs administered by the state is necessary to ensure that all children have a fair, equal, and significant opportunity to obtain a high-quality education. Monitoring assesses the extent to which the state provides leadership and guidance for LEAs in implementing policies and procedures that comply with the statute and guidance for Title X, Part C.

The McKinney-Vento Homeless Assistance Act, requires that State Educational Agencies (SEAs) conduct monitoring of LEAs with and without subgrants; this monitoring must be sufficient to ensure compliance with McKinney-Vento program requirements [Section 722(g)(2)(A) and (B)]. Compliance monitoring not only ensures that LEAs meet their legal responsibilities; an effective monitoring process also can serve to strengthen the quality of programs serving homeless children and youth in all communities. Information gathered during the monitoring process provides evidence of quality implementation and, perhaps equally important, can inform decisions about the kinds of technical assistance that would best serve the school community on behalf of children and families in homeless situations. An effective monitoring process also allows State Coordinators to seek out and identify local practices and procedures that can be shared with others as promising solutions to LEAs whose programs are in various stages of development and implementation.

McKinney-Vento subgrantees are monitored on a three-year cycle. This schedule will be developed following each award cycle. Subgrantee monitoring will be conducted on-site. Decision points for prioritizing monitoring will include changes in liaison since last monitoring, number of years since last monitoring, identification rates compared to SAIPE and free meals data, and other risk factored identified by the state coordinator. Non-subgrantees have many of the same obligations to identify and serve students experiencing homelessness; these LEAs are monitored at least once every five years. Nonsubgrantee LEAs will be prioritized using the same decision points as subgrantees. Nonsubgrantees who had no findings during the last monitoring visit and have the same appointed liaison will have monitoring conducted virtually with desk monitoring and a conference call.
II. MONITORING INDICATORS

The state uses monitoring indicators to determine the degree of implementation of federal programs and activities administered by LEAs. Indicators have been developed across the following themes:

I. The LEA has established an appropriate infrastructure for implementation of the McKinney-Vento Education of Homeless Children and Youth Program.

II. The LEA implements procedures to address the identification, enrollment, and retention of homeless students through coordinating and collaborating with other program offices and community agencies.

III. The LEA has a system for ensuring the prompt resolution of disputes.

IV. The LEA monitors academic progress and success of students experiencing homelessness.

V. LEA subgrant plans for services to eligible homeless students meet all requirements.

The indicators provide guidance for the LEAs regarding the purpose and intended outcomes of monitoring by describing what is required to be monitored and providing the criteria for judging the quality of implementation. Please note that the indicators are written broadly to cover all the requirements of each topic. Guiding questions are provided to assist LEAs in preparing for the monitoring visit. Documentation that LEAs can provide to show compliance with these requirements is listed for each indicator. Interview questions are also provided as another resource.

III. THE MONITORING PROCESS

Monitoring LEAs’ implementation of homeless education requirements provides an opportunity to examine how LEAs have instituted policies, systems, and procedures to ensure LEA and school compliance with the statute.

A. Description of the Monitoring Process

The monitoring of LEAs will take place through on-site and virtual reviews. LEAs will be notified on an annual basis regarding whether they will be monitored by the state for that school year.

1. Preparation for Monitoring

Prior to the monitoring, a webinar will be conducted. This information will assist LEAs by providing background and technical assistance on the monitoring process as well as a review of the federal program monitoring document. Guidance regarding documentation required by the state during the monitoring process will also be provided.
2. Monitoring
Monitoring may be conducted either on-site or by virtual review. The State Coordinator or a Project HOPE-VA consultant will review documentation as outlined within the program area protocol. LEA staff and other stakeholders, as appropriate, will be interviewed during on-site visits or teleconference during desk monitoring. This interview strategy will allow information to be gathered from a variety of sources to better evaluate the LEA’s implementation of the program.

B. Notification of Findings

After monitoring has been conducted, a letter regarding the results will be prepared. The letters will indicate whether the LEA was fully in compliance for all programs or whether the LEA has areas for which it is not in compliance. If an LEA receives a letter of non-compliance, action steps and a timeline for completion will be indicated.
### I. The LEA has established an appropriate infrastructure for implementation of the McKinney-Vento Education of Homeless Children and Youth Program.

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| 1.1. Has the LEA adopted policies and practices to ensure that homeless children and youth are not stigmatized or segregated on the basis of their status as homeless? §722(g)(1)(J)(i) | • Local homeless education policy  
• Reports on homeless students in more restrictive settings, including any suspensions and expulsions | • How does the percentage of homeless youth placed on homebound compare to the overall local percentage?  
• How does the rate of suspensions and expulsions for students experiencing homelessness compare to other groups? | □ Yes □ No □ N/A Comments | □ Yes □ No □ N/A Comments |
| 1.2. Has an appropriate staff person been designated as the LEA liaison for homeless children and youth to carry out the duties described in Title X, Part C? §722(g)(1)(J)(ii)? | • Evidence that the LEA designates a liaison for homeless children and youth  
• LEA staff directory that identifies the liaison  
• LEA Web site that identifies the liaison | • What was the rationale for including the liaison in his/her current department?  
• How is the liaison position classified in HR?  
• How often has the LEA designated a new homeless education liaison?  
• How is the state coordinator notified of any changes in personnel? | □ Yes □ No □ N/A Comments | □ Yes □ No □ N/A Comments |
| 1.3. How does the LEA liaison learn about liaison responsibilities under McKinney-Vento? §722(f)(6) & §722(g)(2) | • Evidence that the LEA allows for training of a liaison for homeless children and youth, e.g., certificates of attendance | • In what professional development activities has the liaison participated related to McKinney-Vento responsibilities?  
• Are there topics the liaison would like to see offered by the state? | □ Yes □ No □ N/A Comments | □ Yes □ No □ N/A Comments |
## Monitoring Indicators for McKinney-Vento Education of Homeless Children and Youth (EHCY) Program

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| **1.4.** How does the liaison ensure LEA personnel are aware of the LEA’s McKinney-Vento responsibilities? §722(g)(6)(A)(v) & §722(g)(6)(B) | • Evidence that the LEA liaison or LEA staff conducts outreach to relevant LEA staff to inform them of McKinney-Vento rights and services for homeless children and youth, such as copies of agenda, minutes, handouts, or notes | • What staff receive training?  
• How frequently is McKinney-Vento information shared?  
• How do school personnel receive appropriate information and technical assistance on the educational rights and needs of homeless students?  
• Is public notice of the educational rights of homeless children and youth disseminated to all schools where such children and youth receive services under the McKinney-Vento Act? | □ Yes □ No □ N/A Comments | □ Yes □ No □ N/A Comments |
| **1.5.** How does the LEA ensure that community agencies that serve homeless individuals are made aware of the rights of homeless students? §722(g)(6)(A)(v) & §722(g)(6)(B) | • Evidence that the LEA liaison or LEA staff conducts outreach to relevant community groups to inform them of McKinney-Vento rights and services for homeless children and youth, such as copies of agenda, minutes, handouts, or notes | • How do service providers, and advocates working with homeless families receive appropriate information and technical assistance on the educational rights and needs of homeless students?  
• Is public notice of the educational rights of homeless children and youth disseminated where such children and youth receive services such as family shelters and soup kitchens?  
  • Where else are the rights of homeless students posted?  
  • What other community activities are conducted to raise awareness of McKinney-Vento rights? | □ Yes □ No □ N/A Comments | □ Yes □ No □ N/A Comments |
II: The LEA implements procedures to address the identification, enrollment, and retention of homeless students through coordinating and collaborating with other program offices and community agencies.

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| 2.1. How does the LEA identify students experiencing homelessness and transmit these data to the SEA? §722(g)(6)(A)(i) | • Written documentation or summaries of homeless students’ initial primary nighttime residence  
• Analysis of identification rate compared to total free meal eligibility and SAIPE  
• The most recent copy of any evaluation reports of McKinney-Vento services or subgrant project | • How does the LEA identify students who are homeless and enter the data in the student management system?  
• Does the LEA use a residency questionnaire during enrollment and during back-to-school activities?  
• What activities are performed to verify accuracy of data for homeless students?  
• How are preschoolers identified and reported?  
• How are out of school youth identified and reported? | ☐Yes ☐No ☐N/A Comments | ☐Yes ☐No ☐N/A Comments |
| 2.2. How and from what sources does the LEA collect information to determine the ongoing needs of homeless students in the LEA? §722(f)(3) | • Student needs assessments  
• Data and summary reports from other program offices in the LEA and other community agencies concerning the educational needs of homeless children and youth in the LEA | • How does the LEA coordinate programs and services between the LEA and other agencies to assist in the identification, enrollment, and retention of homeless students? | ☐Yes ☐No ☐N/A Comments | ☐Yes ☐No ☐N/A Comments |
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<td><strong>2.3.</strong> How does the LEA ensure coordination among LEA programs and community agencies serving students experiencing homelessness, including Title I, Part A, Title III, and special education? §722(g)(5)</td>
<td>• Evidence that the LEA ensures that homeless students receive Title I, Part A, services through sections of the consolidated application and schoolwide program plans addressing the educational needs of homeless students • Description of activities funded through the LEA Title I, Part A, reservation for homeless students • Evidence that the LEA coordinates programs and services between SEA, LEA, and other community agencies, (e.g., schedules, agendas, minutes, notes or handouts)</td>
<td>• How does the LEA determine its Title I, Part A, reservation for students experiencing homelessness and how are the funds used? • How do homeless children and youth receive free meals through the National School Lunch Program? • How do homeless families, children, and youth receive referrals to health care services, dental services, mental health services, and other appropriate services?</td>
<td>☐ Yes ☐ No ☐ N/A</td>
<td>☐ Yes ☐ No ☐ N/A</td>
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<td><strong>2.4.</strong> What special activities are undertaken on behalf of homeless preschool children? §722(g)(6)(A)(iii)</td>
<td>• Sample letters and/or meeting agendas with Head Start, Early Childhood Special Education, VPI, and Early Intervention • Enrollment data for preschoolers • Case notes • Referrals to early childhood programs</td>
<td>• Does the LEA enrollment form request information about younger siblings? • How does the liaison coordinate with early intervention and preschool programs, including community agencies? • Do preschool-aged homeless children receive educational services for which they are eligible, including access to Head Start and preschool programs administered by the LEA?</td>
<td>☐ Yes ☐ No ☐ N/A</td>
<td>☐ Yes ☐ No ☐ N/A</td>
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## Monitoring Indicators for McKinney-Vento Education of Homeless Children and Youth (EHCY) Program

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| **2.5. What special activities are undertaken on behalf of homeless unaccompanied or out-of-school youth? §722(g)(7)(C)** | - Sample letters and/or meeting agendas  
- On-time graduation and dropout rates disaggregated by homeless status | - Does the LEA homeless liaison assist unaccompanied youth with school placement decisions?  
- Are the needs of homeless youth addressed in high school retention efforts? | Yes ☐ No ☐ N/A Comments | Yes ☐ No ☐ N/A Comments |
| **2.6. How does the LEA ensure that homeless students are immediately enrolled and assisted with basic school requirements (e.g., records transfer, health and immunization records, and residency)? §722(g)(3)(C)** | - Evidence that the LEA annually reviews and revises policies and practices to ensure they do not act as barriers to enrolling homeless students, such as agenda, minutes, or notes from meetings where these reviews occur  
- Enrollment records with date of presentment and date of initial attendance | - How does the LEA review and revise policies and practices (such as those regarding immunization and health records, residency requirements, birth certificates, school records, and guardianship) to ensure they do not act as barriers when enrolling homeless students?  
- What data (barrier logs, technical assistance logs, etc.) are used to inform practices?  
- What processes are in place to address barriers and other challenges identified?  
- How does the LEA document that students experiencing homelessness are immediately enrolled in school and provided assistance in obtaining any missing enrollment documents?  
- Are school records made available in a timely manner when a student transfers out of the school division? | Yes ☐ No ☐ N/A Comments | Yes ☐ No ☐ N/A Comments |
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| 2.7. How does the LEA ensure enrollment in the school of origin when determined to be in the best interest of the child? §722(g)(3)(A)(i), §722(g)(3)(B), & §722(g)(6)(A)(vii) | • Feasibility/best interest determination forms  
• Case notes | • How are the parents or guardians of homeless children and youth and unaccompanied homeless youth informed of the educational opportunities available and provided meaningful opportunities to participate in educational decision-making?  
• How does the LEA conduct best interest determinations for placement decisions? | ☐ Yes ☐ No ☐ N/A Comments | ☐ Yes ☐ No ☐ N/A Comments |
| 2.8. How does the LEA ensure transportation to the school of origin? §722(g)(1)(J)(iii) | • Evidence that the LEA ensures that transportation to the school of origin is provided upon request and monitored by the LEA  
• Transportation referral forms | • How is transportation provided, at the request of the parent or guardian (or in the case of an unaccompanied youth, the LEA homeless liaison), to and from the school of origin? | ☐ Yes ☐ No ☐ N/A Comments | ☐ Yes ☐ No ☐ N/A Comments |
### III: The LEA has a system for ensuring the prompt resolution of disputes.

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<td><strong>3.1. Does the LEA have a written LEA dispute resolution process and does it track pre-dispute inquiries concerning barriers to enrollment? §722(g)(3)(E)</strong></td>
<td>• Written dispute resolution policy • Examples of written notification to parents and unaccompanied homeless youth regarding placement decisions when they are different from what was requested • Evidence that LEA implements a process for the prompt resolution of disputes, such as a phone log, notes, or e-mail messages</td>
<td>• What is the local process for providing written notice? • Are enrollment disputes mediated in accordance with Virginia’s dispute resolution process?</td>
<td>□ Yes □ No □ N/A Comments</td>
<td>□ Yes □ No □ N/A Comments</td>
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<td><strong>3.2. What is the LEA’s process to review or investigate disputes brought by parents/youth? §722(g)(3)(E)</strong></td>
<td>• Records indicating that enrollment disputes are investigated and resolved in a timely manner • Evidence that students are enrolled and provided transportation during the dispute resolution process</td>
<td>• How are parent/unaccompanied homeless youth appeals resolved?</td>
<td>□ Yes □ No □ N/A Comments</td>
<td>□ Yes □ No □ N/A Comments</td>
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### IV. The LEA monitors academic progress and success of students experiencing homelessness.

| 4.1. How does the LEA ensure that homeless students are included in statewide assessments? §722(g)(1)(A) | • Reports of statewide assessment performance of homeless students enrolled in the LEA for the last school year  
• Disaggregated SOL performance by homeless flag | • How does the LEA use statewide assessment data to identify needs of students experiencing homelessness? | ☐ Yes ☐ No ☐ N/A Comments |
|---|---|---|---|
| 4.2. Does the LEA monitor graduation rates and college and career ready status for students experiencing homelessness? §721(4) | • Disaggregated on-time graduation and dropout rates  
• Surveys of graduates  
• Number of homeless seniors who apply to and are accepted into postsecondary programs | • Has the LEA explored credit recovery strategies?  
• How do the rates of graduation compare to other LEA subgroups? | ☐ Yes ☐ No ☐ N/A Comments |
### V. LEA subgrant plans for services to eligible homeless students meet all requirements. [§723]

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| 5.1. Does the LEA conduct program evaluation to determine its effectiveness? §723(b)(1) | • Most recent reports of statewide assessment performance of homeless students enrolled in the LEA for the last school year  
• Progress on standards and indicators | • Are student academic outcomes addressed in the LEA’s McKinney-Vento subgrant application and annual report? How are these data used for program improvement? | ☐ Yes ☐ No ☐ N/A Comments | ☐ Yes ☐ No ☐ N/A Comments |
| 5.2. What kind of internal fiscal controls does the LEA have in place to account for the use of subgrant funds in a way that meets federal requirements? §723(a)(2)(iii) & §723(a)(3) | • Evidence the subgrant expands/improves services provided as part of regular academic program  
• Written contracts for any LEA subcontracts of EHCY activities to third-party organizations  
• Evidence the LEA implements required and authorized activities; e.g., budget reports at the end of a fiscal year, records of expenditures, carryover and other summary reports  
• A current list of all personnel (instructional and administrative staff) paid with McKinney-Vento subgrant funds | • How does the LEA conduct its needs assessment, action planning, and program evaluation as part of the McKinney-Vento subgrant process?  
• Does the subgrant expand or improve services provided as part of the regular academic program?  
• Does the LEA subcontract with third party organizations? If so, what is the decision making process used for making awards and monitoring performance?  
• Are reimbursement requests, amendments, and other fiscal requirement processes followed?  
• Are LEA personnel paid with the McKinney-Vento subgrant funds? If so, how are these salaries calculated and reimbursed? | ☐ Yes ☐ No ☐ N/A Comments | ☐ Yes ☐ No ☐ N/A Comments |