**Federal Program Monitoring**

**School Year 2022-2022**

# Title IX, Part A

# *McKinney-Vento Homeless Assistance Act*

# *Education for Homeless Children and Youth Program*

# *Under the Every Student Succeeds Act*

**Project HOPE-Virginia**

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# 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). Project HOPE-Virginia, as its agent for homeless education fulfills this responsibility. This document describes the purpose, rationale, and process used by Project HOPE-Virginia in monitoring compliance with the Education for Homeless Children and Youths Program, Title IX, Part A of the *Elementary and Secondary Education Act,* as amended by the *Every Student Succeeds Act*. With the additional funding under the American Rescue Plan-Homeless Children and Youth (ARP-HCY), a section was added to the monitoring protocol to discuss how these funds are supporting students experiencing homelessness. This section will be included while the funds are available through 2024.

# 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 IX, Part A.

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 [Sections 722(f)(5) and 722(g)(2)(A) and (B)]. Compliance monitoring not only ensures that LEAs meet their legal responsibilities; an effective monitoring process also serves to strengthen the quality of programs for children and youth experiencing homelessness. Information gathered during the monitoring process provides evidence of quality implementation and informs 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 to share with others as promising solutions to LEAs whose programs are in various stages of development and implementation.

McKinney-Vento subgrantees are monitored at least once during the three-year grant cycle. This schedule is developed following each award cycle. (Please note, recipients only receiving ARP-HCY funds are not considered McKinney-Vento subgrantees.) Non-subgrantees have many of the same obligations to identify and serve students experiencing homelessness; these LEAs will be monitored approximately once every five years. Decision points for prioritizing monitoring will include changes in liaisons since last monitoring, number of years since last monitoring, identification rates compared to Census Bureau estimates (e.g., SAIPE), and other risk factored identified by the state coordinator. Subgrants and nonsubgrantees with a new liaison or unresolved findings since the last monitoring will be monitored in-person. Nonsubgrantees that had no findings and continue to have the same liaison since the previous monitoring will have the option for monitoring to be conducted in-person or virtually with desk monitoring and a conference/Zoom call during the 2022-23 cycle.

# III. 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:

1. The LEA has established an appropriate infrastructure for implementation of the McKinney-Vento Education of Homeless Children and Youth Program.
2. 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.
3. The LEA has a system for ensuring the prompt resolution of disputes.
4. The LEA monitors academic progress and success of students experiencing homelessness.
5. The LEA subgrant plan for services to eligible students experiencing homelessness meet all requirements.
6. The LEA use of American Rescue Plan-Homeless Children and Youth funds meets all requirements.

The indicators provide guidance for the LEAs regarding the purpose and intended outcomes of monitoring by describing what is required 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. Examples of documentation that LEAs can provide to show compliance with these requirements is listed for each indicator. Interview questions also are provided as another resource.

# IV. 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

LEAs will be notified on an annual basis regarding whether they will be monitored by the state for that school year.

### 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 be provided. Project HOPE-VA will provide a Cover Sheet of basic information needed for the protocol. Data available at the state level will be completed prior to sending the Cover Sheet to the liaison for completion. The LEA will complete the school division section of the monitoring protocol and collect any backup documentation to support the responses. LEAs being monitored in-person should complete the protocol (maintained as a Word document) and Cover Sheet and upload these to Box (the William & Mary secure system for file sharing) *one week prior* to the scheduled monitoring. LEAs being monitoring virtually also upload the protocol and cover sheet to Box at *least one week prior* the monitoring date. In addition, when monitoring is virtual, the supplemental documentation that supports responses must be uploaded one week in advance. For in-person meetings, the supplemental data is shared during the meeting and can be hard copies or electronic.

1. **Monitoring**

The State Coordinator or Assistant State Coordinator will review documentation as outlined within the program area protocol. LEA staff and other stakeholders, as appropriate, will be interviewed during Zoom meetings during desk monitoring or in-person meetings. 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 is conducted, the liaison will receive a draft of the completed protocol with state comments for review to allow any revisions/clarification that may be needed. A letter regarding the results will be prepared and provided to the State Superintendent for Public Instruction who will sign and distribute the letters to local superintendents and liaisons. The letters will indicate whether the LEA was fully in compliance or whether the LEA has areas of non-compliance. If an LEA receives a letter of non-compliance, action steps and a timeline for completion will be indicated.