

**Fiscal Year (FY) 2016 U.S. Department of Education  
Office of Safe and Healthy Students' Monitoring Report on  
the Minnesota Department of Education's  
Education for Homeless Children and Youth Program**

**Scope of Review:**

On December 8, 2015, the U.S. Department of Education (ED) Office of Elementary and Secondary Education, Office of Safe and Healthy Students (OSHS) monitored the Minnesota Department of Education (MDE), state educational agency's (SEA's) administration of the Title VII-B Education for Homeless Children and Youth (EHCY) program authorized by the McKinney-Vento Homeless Assistance Act (McKinney-Vento) and the reservation for homeless children under section 1113(c)(3)(A) of Title I, Part A of the Elementary and Secondary Education Act of 1965, as amended (ESEA).

**Previous Monitoring:**

ED monitored the MDE EHCY program during the week of March 26-28, 2007. The report is available at <http://www2.ed.gov/admins/lead/account/monitoring/index.html>

**Current Review:**

In its review of the EHCY program, the ED team examined:

- the State's procedures and guidance for the identification, enrollment, and retention of homeless students;
- technical assistance provided to LEAs with and without subgrants;
- the McKinney-Vento EHCY State Plan; and
- LEA applications for subgrants and local evaluations for projects in Anoka Hennepin and St. Paul Public Schools, as well as the local liaisons and staff from Minnetonka and White Bear Lake Public Schools, both non-subgrantee school districts.

The ED team also interviewed the McKinney-Vento EHCY State coordinator to confirm information obtained at the local site and to discuss administration of the program. Based on their review, ED has the following commendations, observations, findings and recommendations:

**Emerging Practices:**

OSHS considers emerging practices to be operational activities or initiatives that contribute to successful outcomes or enhance agency performance capabilities. Emerging practices are those that have been successfully implemented and demonstrate the potential for replication by other agencies.

Typically, emerging practices have not been evaluated as rigorously as "promising," "effective," "evidence-based," or "best" practices but still offer ideas that work in specific situations. As a result of its monitoring activities, OSHS identified the following emerging practices for MDE:

- MDE conducts a risk assessment annually of all LEAs for potential under-identification and underserving of homeless children and youth and uses this risk assessment to target its monitoring of and technical assistance to LEAs. For example, staff compare the number of homeless students enrolled to the Free and Reduced Meal student count over a multi-year period to sort out LEAs with low percentages of homeless students identified. They also track all inquiries and complaints received annually and use these two data points to determine a LEA risk rating. If those LEAs are selected for monitoring, they are asked comprehensive questions in ten topics about McKinney-Vento requirements.
- Coordination on early childhood education for young children experiencing homelessness within the MDE has been advanced by the Race to the Top Early Learning Challenge grant. As a result, publicly funded early childhood providers are more aware of the EHCY definition of homelessness and the less visible population of homeless young children in doubled-up or hotel/motel situations across the State. Furthermore, all young children in shelters are now screened for developmental delays and disabilities.

**Indicator 1.1: Monitoring and evaluation of LEAs with and without subgrants.**

**Recommendation 1.1.1**

Observation: Many of the MDE staff and local liaisons interviewed were not using of all the EHCY data that are submitted to ED at the LEA level or the low percentages of homeless students who are proficient in reading and mathematics in grades 3-8 and once in high school. As a result, they are less able to set annual and long-term goals and plan improvements in program performance, for example, by comparing these data over two or more years.

Recommendation: MDE should provide technical assistance to its subgrantees on creating goals (measurable to the maximum extent appropriate) that include baseline performance measures and annual milestones to improve performance of their programs and for individual homeless students. It should ensure that subgrantees are aware of LEA data reported by SEAs to ED via the *EDFacts* Reporting System. These data include graduate and dropout numbers for homeless students and proficiency in math, reading, and science, grades 3-8, at the LEA and school levels.

One approach that MDE may wish to consider is to ask subgrantees for an annual program evaluation that accounts for any change in performance of the previous two year's EHCY program performance data at the LEA and school levels for one or more performance measures.

**Indicator 2.1: The SEA implements procedures to address the identification, enrollment, and retention of homeless students through coordinating and collaborating with other program offices and State agencies.**

### **Finding 2.1.1:**

Legal Requirement: Section 1113(c)(3)(A) of the ESEA requires an LEA to reserve funds from its Title I, Part A allocation to provide comparable services for homeless students not attending Title I schools, including providing educationally related support services to children in shelters or other locations where homeless children reside.

Additionally, section 1112(b)(1)(O) of the ESEA requires LEAs to include in their consolidated Title I, Part A plan application a description of the services they will provide with funds reserved under section 1113(c)(3)(A) of the ESEA.

Finding: One local liaison interviewed mentioned that none of the amount reserved by the LEA from Title I, Part A to provide comparable services to students experiencing homelessness who do not attend participating Title I schools had been spent in the previous year. A further review of all Title I, Part A set-asides by LEAs in Minnesota for SY 2015-16, as well as the amount expended in SY 2014-15, indicated that many LEAs are setting aside only \$1 to comply with an MDE application requirement and/or are not using the reserved amount. As a result, the most important educational needs of students experiencing homelessness, which could support their attaining important individual outcomes, as well as attaining subgroup goals for the school, district, and State, may be going unaddressed or undersupported.

Further action required: MDE must develop and implement a plan to ensure that LEAs reserve sufficient funds from their Title I, Part A allocations to provide comparable services for homeless students not attending Title I, Part A schools. To ensure that LEAs are aware of the requirement and are reserving sufficient amounts to provide comparable services, this plan should include providing information, guidance and technical assistance to LEAs regarding the reservation. Procedures to ensure compliance could be implemented in a variety of ways, including the following:

- Developing a list of LEAs with homeless reservations and comparing it to a list of LEAs with non-Title I schools and significant homeless student enrollment. There are also data available on the number of homeless students in every LEA who are served in Title I targeted assistance or schoolwide programs. MDE could subtract these homeless students served data from the homeless students enrolled data by LEA to identify which LEAs may have significant numbers of homeless students enrolled in non-Title I schools and for whom the LEA set-asides should be checked.
- Reviewing LEAs with low set-aside amounts by both program offices at MDE. For any LEA with a possibly significant number of homeless students enrolled in non-Title I schools, the EHCY State Coordinator and Title I State Director could review the set-aside amount and recent data on homeless student enrollment in the district to determine whether the set-aside is sufficient.

- Requiring a minimum LEA reservation amount based on the number of homeless students enrolled in non-Title I schools. MDE could also review the amount expended on comparable services in the latest fiscal year for which homeless student enrollment and comparable service expenditure data are available and compare them with the current year to determine whether any current LEA set-asides may be insufficient. Those LEAs should be identified for additional technical assistance or monitoring as appropriate.

**Table 1. Summary of Monitoring Results for the Title VII-B  
Education for Homeless Children and Youth Program**

<b>Indicator Number</b>	<b>Description</b>	<b>Status</b>	<b>Page</b>
Indicator 1.1	The SEA conducts monitoring and evaluation of LEAs with and without subgrants, sufficient to ensure compliance with McKinney-Vento program requirements.	Met Requirements 1 Recommendation	2
Indicator 2.1	The SEA implements procedures to address the identification, enrollment, and retention of homeless students through coordinating and collaborating with other program offices and State agencies.	1 Required Action	3-4
Indicator 2.2	The SEA provides, or provides for, technical assistance to LEAs to ensure appropriate implementation of the statute.	Met Requirements	N/A
Indicator 3.1	The SEA ensures that LEA subgrant plans for services to eligible homeless students meet all requirements.	Met Requirements	N/A
Indicator 3.2	The SEA complies with the statutory and other regulatory requirements governing the reservation of funds for State-level coordination activities.	Met Requirements	N/A
Indicator 3.3	The SEA has a system for ensuring the prompt resolution of disputes.	Met Requirements	N/A