

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

Scope of Review:

During May 10-11, 2016, a review team from the U.S. Department of Education's (ED's) Office of Elementary and Secondary Education, Office of Safe and Healthy Students (OSHS) monitored the Indiana Department of Education (IDOE) 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 (ESEA), as amended by the No Child Left Behind Act.

Previous Monitoring:

ED reviewed IDOE's EHCY program during the week of September 24-28, 2007. The report is available online at: www2.ed.gov/admins/lead/account/monitoring/index.html

Current Review:

In its review of the EHCY program, ED examined IDOE's:

- procedures and guidance for the identification, enrollment, and retention of homeless students;
- technical assistance provided to local educational agencies (LEAs) with and without subgrants;
- McKinney-Vento State Plan; and
- local educational agency (LEA) applications for subgrants and local evaluations of projects in Indianapolis Public Schools and Metropolitan School District (MSD) Warren Township, as well as the local liaison and staff from Avon Community School Corporation, a non-subgrantee school district.

ED also interviewed the McKinney-Vento State Coordinator and Grants Manager to confirm information obtained at the local sites and discussed administration of the program. Based on their review, ED has the following observations, finding, recommendations, and commendation:

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 practice:

- Using its subgrant funds, the MSD Warren Township’s Academic Growth and Recovery program provides an array of services to homeless children and youth in all grade levels including academic tutoring with one or more teachers, truancy intervention, social and anger management skills, and breakfast and lunch on Saturdays.

Indicator 1.1:

The SEA conducts monitoring and evaluation of LEAs with and without subgrants, sufficient to ensure compliance with McKinney-Vento program requirements.

Recommendation 1.1.1

Observation:

IDOE staff indicated the SEA and LEAs could be more systematic in their utilization of data to improve overall homeless student program performance and outcomes. For example, IDOE has not established measurable baseline data, annual milestones, or long-term goals, or encouraged LEAs to do the same with local data. As a result, IDOE and LEAs may be missing opportunities to identify factors that could improve their programs’ performance and outcomes for homeless students.

Recommendation:

ED recommends that IDOE develop a systematic approach to utilize data as part of their strategy to improve overall homeless student program performance, including the establishment of measurable baseline data, annual milestones, and long-term goals.

ED also recommends that IDOE provide technical assistance to encourage LEAs to be more systematic in their utilization of data, including establishing and analyzing measurable baseline data, annual milestones and long-term goals.

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 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:

According to the most recent school year data (2013-2014), 107 LEAs provided services to homeless students who attended non-Title I schools, but did not reserve any funds from their Title I, Part A allocation. In addition, another group of LEAs reserved very little funding from their Title I, Part A allocation even though they also provided services to homeless students who attended non-Title I schools. When asked about the LEAs with zero or low reservation amounts, the IDOE McKinney-Vento State Coordinator reported a lack of coordination with the Title I, Part A program.

Further action required:

DOE must develop and implement a plan to ensure that LEAs reserve sufficient funds from their Title I, Part A allocations to provide comparable services to homeless students attending non-Title I 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:

- Develop a list of LEAs with homeless reservation funds and compare 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. IDOE 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.
- Review low set-aside amounts by LEAs. For any LEA with a lower number of homeless students enrolled in non-Title I schools than a pre-determined threshold, the EHCY State Coordinator and Title I State Director could review the set-aside amount and recent data on homeless student enrollment in the LEA to determine whether the set-aside is sufficient.
- Require a minimum LEA reservation amount based on the number of homeless students enrolled in non-Title I schools. IDOE 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.

Indicator 2.2:

The SEA provides, or provides for, technical assistance to LEAs to ensure appropriate implementation of the statute.

Recommendation 2.2.2Observation:

IDOE does not provide statewide professional development (PD) opportunities for LEA liaisons or track the training that LEA liaisons may receive otherwise. As a result, IDOE is not as well-positioned as it could be to promote consistency and state-of-the-art knowledge among liaisons to enable them to perform their duties as effectively as possible.

Recommendation:

ED recommends that IDOE provide statewide PD opportunities and establish a process to track the training that liaisons receive from other sources. The IDOE statewide PD opportunities could be accomplished using a variety or combination of virtual and in-person methods and serve as a platform to disseminate updated information, best practices, and provide professional networking opportunities.

Table 2. Summary of Monitoring Results for the Title VII-B Education for Homeless Children and Youth Program

Indicator Number	Description	Status	Page
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 Finding	2-3
Indicator 2.2	The SEA provides, or provides for, technical assistance to LEAs to ensure appropriate implementation of the statute.	Met Requirements 1 Recommendation	3-4
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 Number	Description	Status	Page
Indicator 3.3	The SEA has a system for ensuring the prompt resolution of disputes.	Met Requirements	N/A