

**Fiscal Year (FY) 2018 U.S. Department of Education
Office of Safe and Healthy Students' Monitoring Report on
Kentucky Department of Education's
Title VII-B Education for Homeless Children and Youth Program**

Scope of Review:

During April 17-18, 2018, 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 Kentucky Department of Education (KDE's) administration of the (1) Title VII-B Education for Homeless Children and Youth (EHCY) program authorized by the McKinney-Vento Homeless Assistance Act (McKinney-Vento Act) and (2) reservation for homeless children under section 1113(c)(3)(A) of Title I, Part A (Title I) of the Elementary and Secondary Education Act of 1965, as amended (ESEA).

Previous Monitoring: ED reviewed KDE's EHCY program during the week of August 24-28, 2009. The report is available at <http://www2.ed.gov/admins/lead/account/monitoring/index.html>

Current Review: This review was a pilot to test new document review and interview protocols with expanded indicators involving new data analysis of homeless student performance at the local educational agency (LEA) and school level, including of homeless students served by the Title I set-aside and enrolled in Title I schools. New instruments for this pilot review included an LEA data dashboard of key measures converted to percentages of homeless students identified, served, or attaining outcomes such as grade level proficiency; shaded maps of the percentages of homeless students by LEA for these key measures; and an achievement gap analysis between homeless and all students and other economically disadvantaged students by school. Furthermore, new data submitted to ED on chronic absenteeism counts and adjusted cohort graduation rates for homeless students for school year (SY) 2016-17 were analyzed and discussed with local liaisons and the State Coordinator.

In addition, in its review of the EHCY program, ED examined KDE's:

- Procedures and guidance for the identification, enrollment, and retention of homeless students;
- Self-assessment instrument and supporting documentation;
- Technical assistance provided to LEAs with and without McKinney-Vento subgrants;
- KDE's EHCY section of the consolidated State Plan; and
- LEA applications for subgrants and interviews with local liaisons from Paducah Independent and Whitley County school districts, as well as from Crittenden and Harlan County school districts, both non-subgrantee school districts.

ED staff also interviewed the EHCY State coordinator to confirm information obtained at the local site and discuss administration of the program, including the pilot analysis mentioned above of LEA and school-level data submitted by the SEA to ED.

Based on their review, ED has the following observations, commendations of emerging practices, 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 practice for KDE:

- KDE recently issued a regulation that requires all designated local liaisons to receive annual department approved training to cover at least the following topic areas: the rights and services provided for homeless children and unaccompanied youth; identification of homeless children and unaccompanied youth; the state dispute resolution process; data utilization, monitoring and reporting requirements under this regulation; and best practices to serve homeless children and unaccompanied youth.

Indicator 1.2: The SEA assesses the data quality and annual performance of homeless students in LEAs with and without subgrants.

Recommendation 1.2.1

Observation: KDE staff create annual workplans with goals and actions steps as well as 30-60-90 day plans for improving implementation of the EHCY program. However, they recognized that they do not systematically use their annual State, LEA, and school-level data submitted to ED to improve statewide homeless student program performance and outcomes.

Recommendation: ED recommends that KDE analyze data for all LEAs in the State for significant achievement gaps between homeless and other students in terms of grade-level proficiency in reading and math or in graduation rates. Furthermore, there is also data on chronic absenteeism that may correlate with these achievement gaps. KDE can then target and customize its monitoring and technical assistance to specific LEAs or groups of LEAs in a region.

Indicator 3.1: The SEA ensures that LEA subgrant plans for services to eligible homeless students meet all requirements.

Recommendation 3.1.1

Observation: ED observed that the subgrant programs did not include program-level outcome measures for an annual cohort of homeless students identified by those LEAs. Instead, they focused on output measures for services provided to identified homeless students. Neither LEA evaluation plan reviewed referenced baseline measures or annual milestones toward attaining multi-year program outcome goals for all or a majority of homeless students identified and served.

Recommendation: ED recommends that KDE provide technical assistance to its subgrantees on creating goals (measurable to the maximum extent appropriate) that include baseline performance measures and annual milestones toward multi-year outcome goals. Subgrantees may not be fully aware of all LEA data reported by SEAs to ED via the *EDFacts* Reporting System nor did the subgrantees report using these data. These data have included for many years graduate and dropout numbers for homeless students, and proficiency in math, reading, and science, grades 3-8 and high school, at the LEA and school levels. In addition, States are reporting to ED chronic absenteeism and graduation rates at the school level beginning with SY 2016-17. These reports provide new opportunities to correlate achievement gaps, chronic absenteeism, and graduation rates for homeless students at the school level.

One approach that KDE could consider is asking subgrantees for an annual program evaluation that accounts for any change in performance of the previous two years of EHCY program performance data at the LEA and school levels. Longitudinal tracking of performance provides information at the program level on whether program improvements are moving outcomes in the desired direction.

**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 of LEAs with and without subgrants, sufficient to ensure compliance with McKinney-Vento program requirements.	Met Requirements	N/A
Indicator 1.2	The SEA assesses the data quality and annual performance of homeless students in LEAs with and without subgrants.	Met Requirements 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.	Met Requirements	N/A
Indicator 2.2	The SEA provides, or provides for, professional development and 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 Recommendation	2-3
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 ensures that the LEA complies with providing comparable Title I, Part A services to homeless students attending non-Title I and Title I schools.	Met Requirements	N/A

Responses to Department of Education’s Fiscal Year 2018 EHCY Monitoring

Indicator Number	KDE Response
1.2.1	<p>Kentucky Department of Education (KDE) program staff and division leadership have begun to incorporate this recommendation into a 30-60-90 day plan and will integrate it into our annual action plan. We met with members of the KDE Strategic Planning and Research Team for support with Extranet site data on achievement gaps and graduation rate. The Team will assist with the creation of clear, understandable representations and summaries of these data elements. We will use these representations to communicate the context for statewide goals around achievement gap and graduation rate.</p> <p>The recommendation to use data analysis to target and customize technical assistance to specific LEAs or groups of LEAs in a region is being incorporated into a core process; this work is currently underway.</p>
3.1.1	<p>This recommendation will be incorporated into our annual action plan. We will work with individual subgrantees on accessing and understanding their data, and creating goals. They will be required to report progress toward these goals. As part of our monitoring process, we will require subgrantees to provide an annual program evaluation that accounts for changes in performance data and will use this in the identification of risks.</p>