

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

**Scope of Review:**

On May 2nd and 25th and on July 11th, 2018, a review team from the U.S. Department of Education's (ED) Office of Elementary and Secondary Education, Office of Safe and Healthy Students (OSHS) monitored the North Dakota Department of Public Instruction's (NDDPI'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 reviewed NDDPI's EHCY program during the week of May 5-9, 2008. The report is available at: <https://www2.ed.gov/admins/lead/account/monitoring/map/nd.html>

**Current Review:**

This review was a pilot to test a protocol for a document review and interviews with expanded indicators that included 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 ED 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 were analyzed and discussed with local liaisons and the State Coordinator for school year (SY) 2016-17.

In addition, in its review of the EHCY program, ED examined NDDPI'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 subgrants;
- EHCY section of the consolidated state plan; and
- LEA applications for subgrants and local evaluations of projects in Fargo and Williston school districts, as well as the local liaisons and staff from Belcourt and Grand Forks school districts, both non-subgrantee school districts.

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

Based on the review, ED staff made the following observations, commendations of emerging practices, a recommendation, and a finding:

**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 possess 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 in North Dakota that may be good to highlight to encourage other State Coordinators to consider for their respective EHCY programs:

**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: While the Office of the State Coordinator conducts comprehensive annual planning, it recognized that it does not use its annual State and LEA level data submitted to ED to set measurable goals to improve statewide homeless student program performance and outcomes. The State Coordinator and State Educational Agency (SEA) staff expressed interest in setting statewide goals in an annual workplan as they will now require LEA subgrantees to do so as well.

Recommendation: ED recommends that the SEA and the Office of the State Coordinator create work plans with baseline measure(s) and annual goal(s) to create a workplan with baseline measure(s) and annual goal(s) using State data on one of following: the underidentification of homeless students, graduation rates (4-year), chronic absenteeism, or achievement gaps with economically disadvantaged students.

**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.**

**Finding 3.3.1:**

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 who do not attend participating schools, including providing educationally related support services to children in shelters or other locations where homeless children reside.

Finding: During monitoring of NDDPI's EHCY program, ED learned that many LEAs receiving Title I, Part A grants in FY 2017-18 had identified and enrolled homeless students in school year (SY) 2015-16 but did not set aside an amount for comparable and additional support services for these students. This new requirement took effect in July 2017, but ED staff learned that the Title I, Part A staff at the SEA were unaware of this and had allowed LEAs to assure that they were using local funds to address the needs of homeless students.

Further action required: NDDPI must submit evidence that all LEAs that receive a Title I, Part A grant and have identified homeless students enrolled in their district this year must have reserved some amount for comparable or educationally related support services for them.

**Table 2. 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 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 Commendation	N/A
Indicator 3.1	The SEA ensures that LEA subgrant plans for services to eligible homeless students meet all requirements.	Met Requirements Commendation	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 ensures that the LEA complies with providing comparable Title I, Part A services to homeless students attending non-Title I and Title I schools.	Finding	3