

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

**Scope of Review:**

During September 11-13, 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 Ohio Department of Education's (ODE'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 (Title I) of the Elementary and Secondary Education Act of 1965, as amended (ESEA).

**Previous Monitoring:**

ED reviewed ODE's EHCY program during the week of January 8-12, 2007. The report is available at <https://www2.ed.gov/admins/lead/account/monitoring/map/oh.html>.

**Current Review:**

For states reviewed in FY 2018, ED used a pilot process, which has new document review and interview protocols and uses expanded indicators and instruments. These indicators and instruments required 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 in the pilot process 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 or 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 the 2016-17 school year (SY) were analyzed and discussed with local liaisons and the State Coordinator.

ED also reviewed the following parts of the ODE's EHCY program:

- 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;
- Consolidated State Plan, EHCY section; and
- applications of LEA subgrants to Cincinnati City Schools (CCS) and Springfield City Schools (SCS).

ED staff conducted interviews with liaisons and staff from CCS and SCS and with two non-subgrantee school districts, Mt. Healthy and Worthington City Schools. The EHCY State Coordinator also was interviewed 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 State to ED.

Based on their review, ED has the following observations of emerging practices and recommendations for program improvement:

**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 practice in Ohio:

- In line with State goals to reduce chronic absenteeism among all public school students with annual percentage reductions, ODE has also set annual goals to reduce chronic absenteeism among homeless students from SY 2015-16 to SY 2025-26. Analysis of lower levels of proficiency in reading, math and science and higher levels of chronic absenteeism from ODE's SY 2016-17 data by the National Center for Homeless Education showed a strong negative correlation.
- LEAs can subscribe to two portals called "Public Works" and "Safe Schools" that include training modules on McKinney-Vento. ODE staff may request to see the district personnel who have participated in this training and how well they performed on a post-test. This is one way SEAs and LEAs can satisfy the EHCY requirement that SEAs provide professional development opportunities for LEA personnel and the LEA liaison to assist such personnel in identifying and meeting the needs of homeless children and youths, and provide training on the definitions of terms related to homelessness.
- CCS' Project Connect already provides targeted outreach, counseling and mentoring for all unaccompanied homeless youth and other homeless youth who are juniors and seniors to support their being on track to graduate from high school and apply to and enroll in postsecondary education programs. With some grant funding and collaboration with the Cincinnati Youth Collaborative (CYC), CCS is also supporting 10 recent high school graduates while they are enrolled in institutions of higher education in the metropolitan area. They are given computers and incentives to participate in regular college counseling and mentoring. Project Connect and CYC plan to expand this cohort by 10 students every year and follow them until they graduate from their institutions of higher education.

**Indicator 1.2: The State educational agency (SEA) assesses the data quality and annual performance of homeless students in LEAs with and without subgrants.**

**Recommendation 1.2.1**

Observation: ODE staff recognized that they do not systematically use their annual State and LEA level data to target their monitoring by including performance factors in their risk assessment, or to target their technical assistance to LEAs.

Recommendation: ED recommends that ODE use LEA data on homeless student identification and performance in order to improve statewide homeless student program performance and outcomes. For example, ODE staff can analyze data for all LEAs in the State to see if there are patterns of potential under identification of homeless children and youth by LEA, including unaccompanied homeless youth, that may overlap with patterns of potential underserving of these students through EHCY subgrants and Title I, Part A set-asides across the State. As another

example, ODE staff can analyze the data for significant achievement gaps between homeless and other students in terms of grade-level proficiency in reading and math, chronic absenteeism, or in on-time and extended-year graduation rates. ODE can then target and customize its monitoring and technical assistance to specific LEAs or groups of LEAs in a region or for which a certain risk factor for students experiencing homelessness is high.

**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 ODE’s subgrant programs did not include program level outcome measures for an annual cohort of homeless students identified by those LEAs. ODE staff discussed including EHCY subgrantees in a contract for professional development on program or project evaluation.

Recommendation: ED recommends that ODE 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 did seem to be aware of their data reported by SEAs to ED via the *EDFacts* Reporting System as well as other data they monitor regularly on currently identified students. However, their evaluation plans did not include any measurable goals with baseline data. There are many data points to choose from, including graduate and dropout numbers for homeless students, chronic absenteeism and graduation rates, and percentages who are proficient in math, reading, and science, grades 3-8 and high school, at the LEA and school levels.

One approach that ODE 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**

<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	3
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	3-4
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

**ODE’s Responses to U.S. Department of Education’s Recommendations:**

<b>Indicator Number</b>	<b>ODE Response</b>
1.2.1	<p>It is the intention of the Ohio Department of Education to fully implement the recommendations of the US Department of Education and incorporate LEA level homeless student performance data into the risk assessment that is being used to target technical assistance to LEA’s.</p> <p>By performing both a year over year as well as a longitudinal data analysis of reported homeless student outcomes data and incorporating this into the risk assessment, it should be much easier to identify areas where the homeless student population is potentially being underserved. Comparisons between the homeless subgroup and other subgroups will be extremely valuable when looking for achievement gaps that can be useful in the data driven decision-making process that is used to target where resources are needed the most.</p>
3.1.1	<p>ODE will review ways to monitor and evaluate program performance in the future. Further consideration will be given to the recommendation of 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.</p>