

**Fiscal Year (FY) 2017 U.S. Department of Education
Office of Safe and Healthy Students' Monitoring Report on
the Tennessee Department of Education's
Title VII-B Education for Homeless Children and Youth Program**

Scope of Review:

During September 6-7, 2017, 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 Tennessee Department of Education (TDOE'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 TDOE's EHCY program during the week of February 23-27, 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 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. The pilot review helped ED staff determine which instruments were most useful for interview and discussion with SEA and LEA staff and for recommending follow up actions to the SEA.

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

- Procedures and guidance for the identification, enrollment, and retention of homeless students;
- Technical assistance provided to LEAs with and without subgrants;
- TDOE's McKinney-Vento EHCY State Plan; and
- LEA applications for subgrants and local evaluations of projects in Davidson and Rutherford County school districts, as well as the local liaisons and staff from Cheatham County and Murfreesboro school districts, both non-subgrantee school districts.

ED staff also interviewed the McKinney-Vento 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 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 practices for TDOE:

- TDOE had a statewide training plan for the 2017-18 grant year that included several McKinney-Vento regional trainings. Furthermore, of its eight technical assistance regions, coordinators submitted draft plans in three regions that included specific McKinney-Vento training needs.
- TDOE stated in its State plan that it has a Tennessee Advisory Council on the Education of Homeless Children and Youth, which started in April 2016. It is intended to continuously review policies and barriers to identification, enrollment, retention, and achievement of students experiencing homelessness. The first quarterly meeting of subgrantee liaisons was already scheduled for October 2017.
- Rutherford County LEA explained how it supported two staff funded through the Title I, Part A set-aside who worked intensively in providing support services to middle and high school students experiencing homelessness, liaising with staff including graduation coaches in high schools, resulting in an 89% graduation rate for students experiencing homelessness in grades 9-12.

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: TDOE staff recognized that they do not systematically use their annual State and LEA level data to improve statewide homeless student program performance and outcomes.

Recommendation: ED recommends that TDOE analyze data for all LEAs in the state to see if there are patterns of potential underidentification of homeless children and youth by LEAs, including unaccompanied homeless youth, that may also overlap with patterns of potential underserving of these students through EHCY subgrants and Title I, Part A set-asides across the State, and significant achievement gaps between homeless and other students in terms of grade-level proficiency in reading and math or in graduation rates. TDOE can then target and customize its monitoring and technical assistance to specific LEAs or groups of LEAs in a region. For example, the southern border county LEAs and Memphis-area LEAs appeared to be potentially underidentifying and underserving students, and had poorer outcomes for students experiencing homelessness than other LEAs in the State, which could also be the result of incomplete data reporting. TDOE staff mentioned that they would like to focus on reducing chronic absenteeism in LEAs and schools, particularly in LEAs and schools with a higher rate of chronic absenteeism for homeless students, especially since chronic absenteeism is also an accountability measure in TDOE's State plan. That effort is likely to improve achievement and graduation rates for homeless students.

Indicator 2.2: The SEA provides, or provides for, professional development and technical assistance to LEAs to ensure appropriate implementation of the statute.

Recommendation 2.2.1

Observation: TDOE staff recognized that they do not track local liaison turnover and training participation to identify which LEAs may have newly designated local liaisons who have not been trained in LEA requirements to identify and serve students experiencing homelessness.

Recommendation: ED recommends that TDOE check local liaison turnover at least once annually before the start of the school year and whether new liaisons have participated in a live training offered through TDOE or other sources, such as ED’s National Center for Homeless Education. This information can then be used to develop regionally targeted or customized trainings.

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 neither of the two reviewed subgrant programs included measurable goals for all homeless students identified by those two LEAs. One subgrantee had one outcome measure of improved grades by the end of the semester for a subset of homeless students receiving tutoring. However, neither LEA evaluation plan 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 TDOE 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. These data include 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 from SY 2016-17. TDOE already has homeless student graduation rates and chronic absenteeism numbers for SY 2014-15, so it can already begin to analyze and share these data and analyses with LEAs.

One approach that TDOE 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. Currently its self-monitoring instrument administered annually to subgrantee LEAs does not ask for this kind of annual evaluation.

Recommendation 3.1.2

Observation: ED observed there was only one reviewer for five of the 22 subgrant applications in the Fiscal Year 2017 competition. TDOE noted that it had intended to have at least two staff reviewers for each application and that every LEA that applied for a grant received one, although no LEA received the full amount it had requested.

Recommendation: ED recommends that there be more than one reviewer for every grant application in a competition. Furthermore, to alleviate pressure on or reduce bias from the State Coordinator, who manages the competition, it would be useful if at least two reviewers for each application were subject matter experts outside the Office of the Coordinator.

**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	2-3
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 Recommendation	3
Indicator 3.1	The SEA ensures that LEA subgrant plans for services to eligible homeless students meet all requirements.	Met Requirements Recommendations	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

Responses to Department of Education’s Fiscal Year 2017 EHCY Monitoring

Indicator Number & EDs Observation	TDOEs Response	Completion Date
<p>1.2.1 TDE staff recognized that they do not track local liaison turnover and training participation to identify which LEAs may have newly designated local liaisons who have not been trained in LEA requirements to identify and serve students experiencing homelessness.</p>	<p>Tennessee’s Education for Homeless Children and Youth (EHCY) Program has contracted services with KickStand to complete needs assessment for technical assistance. Statewide and KickStand data will coordinate the type of technical assistance that will drive the regional meetings. In 2017, the state coordinator hosted four regional meetings to provide a rich, personalized technical assistance experience. In 2018, the regional meetings will expand across eight regions. Liaisons will attend meetings and receive advantageous technical assistance to drive positive outcomes.</p>	<p>Ongoing</p>
<p>2.2.1 ED recommends that TDE check local liaison turnover at least once annually before the start of the school year and whether new liaisons have participated in a live training offered through TDE or other sources, such as ED’s National Center for Homeless Education. This information can then be used to develop regionally targeted or customized trainings.</p>	<p>*A log was created to track the tenure of homeless liaisons. The state coordinator will update the log annually and as needed. **The State Coordinator has created a section on the TDOE “ESSA Title IX” webpage to allow incoming or outgoing homeless liaisons to update their contact information on a regular basis.</p>	<p>* October 12, 2017 **TBD</p>
<p>3.1.1 ED observed that neither of the two reviewed subgrant programs included measurable goals for all homeless students identified by those two LEAs. One subgrantee had one outcome measure of improved grades by the end of the semester for a subset of homeless students receiving tutoring. However, neither the LEA evaluation plan referenced baseline measures nor annual milestones toward attaining multi-year program outcome goals for all or a majority of homeless students identified and served.</p>	<p>* Within its McKinney-Vento subgrant technical assistance webinar The State Coordinator will include a section on developing adequate program objectives with measurable outcomes. This training is offered prior to the opening of the subgrant cycle. **The McKinney-Vento Subgrant Closeout Report was created for the LEA to display evidence of quality program implementation. The report uses several key indicators to identify the strengths and areas of opportunities of the LEAs homeless education program. The report has become a “Statement of Assurance” of the subgrant application. The report must be completed in order to receive McKinney-Vento funds for the subsequent year.</p>	<p>*Fiscal Year 2019 **November 14, 2017</p>

Indicator Number & EDs Observation	TDOEs Response	Completion Date
3.1.2 ED observed there was only one reviewer for five of the 22 subgrant applications in the Fiscal Year 2017 competition. TDE noted that it had intended to have at least two staff reviewers for each application and that every LEA that applied for a grant received one, although no LEA received the full amount it had requested.	The grant review process will adopt a two-tiered model prior to the next grant cycle. The state coordinator is researching various models utilized by coordinators from different states to determine which practice will best fit the need for Tennessee’s EHCY program.	*February 2018
1.2.1 TDE staff recognized that they do not track local liaison turnover and training participation to identify which LEAs may have newly designated local liaisons who have not been trained in LEA requirements to identify and serve students experiencing homelessness.	Tennessee’s Education for Homeless Children and Youth (EHCY) Program has contracted services with KickStand to complete needs assessment for technical assistance. Statewide and KickStand data will coordinate the type of technical assistance that will drive the regional meetings. In 2017, the state coordinator hosted four regional meetings to provide a rich, personalized technical assistance experience. In 2018, the regional meetings will expand across eight regions. Liaisons will attend meetings and receive advantageous technical assistance to drive positive outcomes.	Ongoing
2.2.1 ED recommends that TDE check local liaison turnover at least once annually before the start of the school year and whether new liaisons have participated in a live training offered through TDE or other sources, such as ED’s National Center for Homeless Education. This information can then be used to develop regionally targeted or customized trainings.	*A log was created to track the tenure of homeless liaisons. The state coordinator will update the log annually and as needed. **The State Coordinator has created a section on the TDOE “ESSA Title IX” webpage to allow incoming or outgoing homeless liaisons to update their contact information on a regular basis.	* October 12, 2017 **TBD