

**U.S. Department of Education Monitoring Report
Education for Homeless Children and Youth Program,
American Rescue Plan – Homeless Children and Youth Program,
and Title I, Part A LEA Homeless Reservation Requirement
for the District of Columbia Office of the State Superintendent of Education
April 11, 2023**

Scope of Review

On November 29 and December 1, 2022, a review team from the U.S. Department of Education's (the Department's) Office of Elementary and Secondary Education (OESE), Office of School Support and Accountability (SSA) monitored the District of Columbia Office of the State Superintendent for Education's (OSSE's) administration of the Education for Homeless Children and Youth (EHCY) program authorized by Subtitle VII-B of the McKinney-Vento Homeless Assistance Act (McKinney-Vento Act), 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), and the Homeless Children and Youth funding authorized under section 2001(b) of the American Rescue Plan Act of 2021 (ARP-HCY).

Previous Monitoring

The Department last reviewed OSSE's EHCY program and its reservation for homeless children under ESEA section 1113(c)(3)(A) in May 2010. This is the first time that the Department has monitored OSSE's implementation of the ARP-HCY program.

Current Review

The Department's monitoring plan and protocol (see: <https://oese.ed.gov/files/2022/09/SSA-EHCY-ARP-HCY-Monitoring-Plan-FY-23.pdf>) includes a State educational agency (SEA) self-assessment and interview protocols for the SEA and a few selected local educational agencies (LEAs). The plan and protocol incorporate questions related to ARP-HCY.

In its review of OSSE's implementation of its programs for students experiencing homelessness, the Department examined OSSE's:

- Procedures and guidance for the identification, enrollment, and retention of students experiencing homelessness, including the focus in using ARP-HCY funds to increase identification of children and youth experiencing homelessness in historically underserved populations and to connect them to educational support and wrap-around services;
- Self-assessment instrument and supporting documentation;
- Technical assistance provided to LEAs with and without subgrants;
- EHCY section of the State's consolidated State plan;
- ARP-HCY State plan;
- LEA applications for ARP-HCY subgrants; and
- Local evaluations of projects in the following LEAs: Maya Angelou Public Charter, Friendship Public Charter, SEED Public Charter, and DC Public Schools (DCPS).

The Department interviewed the local liaisons for these four LEAs as well as the EHCY State Coordinator and other SEA staff with duties assigned to the EHCY or ARP-HCY programs. Based on the review, the Department determined a result for each of the seven areas of the review. For any area with a commendation, with a recommendation for improvement, or where further action is needed, the report provides a synopsis of what was observed and a description of the finding. The report rates implementation of each area based on four levels:

- “Met Requirements with Commendation” represents high quality implementation where the SEA is exceeding expectations;
- “Met Requirements” indicates that work is of an acceptable quality, and no instances of noncompliance were identified;
- “Met Requirements with Recommendations” indicates there are quality implementation concerns and some improvements could be made to ensure the SEA continues to meet expectations; and
- “Action Required” indicates there are significant compliance or quality concerns that require attention by the SEA and will be revisited until the State has remedied the issue. For items listed as “Action Required,” the report outlines the current practice, the nature of noncompliance, and the required action.

Table 1. Summary of Monitoring Results for the EHCY and ARP-HCY Programs and Title I, Part A LEA Homeless Reservation Requirement

Topic Number	Description	Status
1	SEA Monitoring and Evaluation	<ul style="list-style-type: none"> • Action Required • Recommendation
2	SEA and LEA Performance Evaluation	<ul style="list-style-type: none"> • Met Requirements with Recommendation
3	SEA Policy and Coordination	<ul style="list-style-type: none"> • Met Requirements
4	SEA Professional Development and Technical Assistance	<ul style="list-style-type: none"> • Met Requirements
5	SEA Fiscal Oversight of LEA Subgrants for EHCY and ARP-HCY	<ul style="list-style-type: none"> • Met Requirements
6	SEA Set-Aside Oversight for EHCY and ARP-HCY	<ul style="list-style-type: none"> • Met Requirements with Recommendation
7	SEA Fiscal Oversight of the Title I, Part A LEA Homeless Set-Aside	<ul style="list-style-type: none"> • Met Requirements with Recommendation

Based on the review, Department staff made the following observations, commendations, recommendations, and/or noted actions that are required.

1. SEA Monitoring and Evaluation

Process for monitoring all LEAs for McKinney-Vento and subgrant requirements

Requirement

McKinney-Vento Act section 722(f)(5) (“Functions of the Office of the Coordinator”) requires the SEA to “provide technical assistance to and conduct monitoring of local educational agencies in coordination with local educational agency liaisons designated under subsection (g)(1)(J)(ii), to ensure that local educational agencies comply with the requirements of subsection (e)(3) and paragraphs (3) through (7) of subsection (g).” Furthermore, 2 C.F.R. § 200.329 of the Uniform Guidance, pertaining to “monitoring and reporting program performance,” requires an SEA (i.e., the non-Federal entity) to be “responsible for oversight of the operations of the Federal award supported activities. The non-Federal entity must monitor its activities under Federal awards to assure compliance with applicable Federal requirements and performance expectations are being achieved. Monitoring by the non-Federal entity must cover each program, function or activity.”

Observations

OSSE has not monitored LEAs for McKinney-Vento requirements since 2020 and did not have a plan or protocol for programmatic monitoring of McKinney-Vento and ARP Homeless I and II subgrantees at the time of the interviews.

Action required

Within 60 business days of receiving this report, OSSE must submit:

1. A monitoring plan for conducting interviews, reviewing documents, and performance data, and also addressing corrective actions for McKinney-Vento EHCY and ARP-HCY subgrantees for FY 2023.
2. Evidence of programmatic monitoring, such as written reports provided to an LEA, including both an LEA with and without any EHCY or ARP-HCY subgrant.

Recommendation

With the increase in the number of LEAs receiving homeless education grants through the distribution of ARP Homeless II subgrants through the formula allocation, the Department recommends that OSSE include questions about homeless education data in interview protocols and in performance risk assessment or desk audits of LEAs. These performance indicators may include data on students experiencing homelessness such as potential under-identification, chronic absenteeism, or adjusted cohort graduation rates.

2. SEA and LEA Performance Evaluation

Use of LEA enrollment and performance data to improve outcomes for students experiencing homelessness

Requirement

Sections 722(f)(1) and (3), 722(g)(2), 722(g)(6)(C), 723(b)(6), 723(c)(3)(E) and (I), 724(d), and 724(h)(1) of the McKinney-Vento Act detail the requirements of SEAs and LEAs to collect, report, and use homeless student enrollment and performance data to improve programs and outcomes for students experiencing homelessness.

Observation

LEAs noted that OSSE provided training on the data to be collected and submitted for the annual program data collection. OSSE noted that it was conducting outreach to increase identification of students experiencing homelessness to address the decrease in identified students during the COVID-19 pandemic and that homeless liaisons now have access to absenteeism information. There was no indication, however, that OSSE was providing training on how to use the data collected for program implementation or improvement.

Recommendation

The Department recommends that OSSE work with the Department's contracted technical assistance provider, the National Center for Homeless Education (NCHE), to develop a process to review the EHCY data submitted by LEAs to identify LEAs that may be most at risk of under-identifying students experiencing homelessness or where homeless student subgroups are performing significantly below the District and national averages on program outcome measures such as the adjusted cohort graduation rate (ACGR) and chronic absenteeism. As part of this process, the Department recommends that OSSE specify statewide goals for EHCY program improvement and have EHCY and ARP-HCY subgrantees track performance on key measures.

The Department also recommends that OSSE develop a plan or procedure to provide technical assistance to all LEAs, and in particular ARP-HCY grantees, to improve their ability to analyze and use outcome data on students experiencing homelessness, such as achievement on State assessments in reading/language arts, mathematics, and science, ACGR, and chronic absenteeism data to improve outcomes.

6. Oversight of the SEA set-aside for EHCY and ARP-HCY

Requirement

The SEA shall set aside no more than 25 percent of the allocation for administrative purposes as are reasonable and necessary to administer the EHCY program and fulfill the duties of the state coordinator.

Observation

OSSE submitted partial documentation of how the full 25 percent set-asides were being used for the FY 2022 EHCY grant and the ARP-HCY grant. For both programs, the majority of the set-

aside funding had not been allocated to specific items in the proposed program budgets. OSSE staff reported that they have determined the planned uses of funds for both set asides but have not yet submitted documentation to show how the amounts will be allocated.

Recommendation

Subsequent to the review but prior to the release of this report, OSSE provided updated information regarding its ARP Homeless budget and allocations, including the awarding of contracts to four community-based organizations (CBOs) that may assist in the identification of and services to historically underserved populations of students experiencing homelessness. The Department appreciates this additional information, which addresses a recommendation stemming from the review that OSSE finalize the budgets for all set-asides in a timely manner to allow for the successful implementation of high-quality programs and to expedite contracting processes to ensure that CBOs support OSSE's work.

7. SEA Fiscal Oversight of the Title I, Part A LEA Homeless Reservation

SEA review and approval process

Requirement

Section 1113(c)(3)(A) of the ESEA requires LEAs that receive Title I, Part A grants and have students experiencing homelessness enrolled in the LEA to reserve "such funds as are necessary under this part...to provide services comparable to those provided to children in schools funded under this part to serve homeless children and youths, including providing educationally related support services to children in shelters and other locations where children may live."

Section 1113(c)(3)(C) of the ESEA offers criteria on which the amount of reserved funds may be determined, which include a needs assessment and other allowable expenses such as the excess cost of school of origin transportation and salaries for local liaisons based on their duties. An SEA and its LEAs are required to coordinate their Title I, Part A programs with their EHCY programs (ESEA sections 1111(a)(1)(B) and 1112(a)(1)(B)).

Observation

Per the District of Columbia Charter School Reform Act, DCPS is the only LEA required to reserve Title I, Part A funds to provide services to homeless children and youth. OSSE does provide guidance to LEAs on the policies and procedures required regarding the determination of the Title I, Part A set aside and the use of those funds to identify and serve students experiencing homelessness. However, during the interview process the LEA homeless liaison for DCPS reported that she was not aware of the amount of the homeless reservation, nor what the funds were being spent on. She noted that the LEA pays for two staff members who serve students experiencing homelessness and allocates \$20,000 for professional development for those staff but was unaware of the funding source for these expenses. Furthermore, because DCPS is the only LEA required to reserve funds from Title I, Part A to serve students experiencing homelessness, the EHCY subgrant application does not require LEAs to indicate the amount of their Title I, Part A homeless reservations or describe the services being provided in coordination with EHCY subgrant-funded services.

Recommendation

The Department recommends that OSSE provide guidance to all LEAs, including DCPS and all public charter school LEAs, on how to determine the amount of the homeless reservation (while not required for charter school LEAs in DC, the reservation of funds for homeless students is encouraged). The Department recommends that the reservation be based on a needs assessment that considers both the number of students identified and the needs of those students as described in ESEA section 1113(c)(3)(C)(i). The SEA should provide technical assistance (e.g., presentations or written documentation) to LEAs on determining sufficient reservation amounts based on LEA data such as achievement in reading/language arts, mathematics, and science; the ACGR; and chronic absenteeism rates for homeless children and youth in that LEA. The Department also recommends that OSSE ask EHCY subgrant applicants to indicate the amount of the homeless reservation, if there is one, and describe how services funded with that reservation will be coordinated with EHCY subgrant-funded services.

The Department further recommends that OSSE provide DCPS with guidance on the importance of including the LEA's homeless liaisons in both the needs assessment and the decision-making process regarding the amount of the homeless reservation and the use of those funds to meet the needs of students experiencing homelessness.