



Department of  
**Education**

# McKinney-Vento Toolkit

A Guide for Homeless Liaisons,  
Local Educational Agencies, and Schools

Tennessee Department of Education | December 2025



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# Introduction

The Education for Homeless Children and Youth program, authorized under Title VII, Part B of the McKinney-Vento Act, was reauthorized in December 2015 with the passage of the Every Student Succeeds Act (ESSA).<sup>1</sup> All local educational agencies (LEAs) are required to provide needed services to homeless children, as well as set aside a portion of their Title I, Part A funding for students experiencing homelessness. In addition, the Tennessee Department of Education (department) receives funding through the federal McKinney-Vento Homeless Education Grant Program and distributes grants competitively to LEAs that have developed programs that document effective collaboration between LEAs and service providers to ensure that homeless students receive needed services. All LEAs, regardless of whether they receive a McKinney-Vento subgrant, must comply with required identification, reporting, and service responsibilities to homeless children and youth (e.g., enrollment, transportation, free lunch, equal access to education and extracurricular activities, and services).

The McKinney-Vento Act places a strong emphasis on the importance of school stability for students experiencing homelessness and is designed to address the challenges that these students face in enrolling, attending, and succeeding in school. Research shows that changing schools multiple times may significantly impede a student's academic and social growth.<sup>2</sup> Therefore, the McKinney-Vento Act calls for LEAs to maintain students in their school of origin to promote school stability and greater educational outcomes, unless it is determined not to be in the student's best interest.

This toolkit provides clear and specific explanations of the provisions of the McKinney-Vento Act and includes helpful practices, procedures, and tools. New homeless liaisons, as well as experienced liaisons, can use the toolkit to understand the law and find ways to improve their programs. Every LEA, school, student, and family is different. Local liaisons are encouraged to use this guide and adapt the resources in this toolkit to meet the unique needs of their community.

For questions regarding McKinney-Vento programming and supporting students in transition, please contact:

**Vanessa Waters** | McKinney-Vento and Immigrant Grant Manager

Division of Federal Programs and Oversight

[Vanessa.Waters@tn.gov](mailto:Vanessa.Waters@tn.gov)

(615) 917-3750

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<sup>1</sup> 42 U.S.C. § 11431.

<sup>2</sup> U.S. Dep't. of Educ., Education for Homeless Children and Youths Program Non-Regulatory Guidance (July 27, 2016), <http://www2.ed.gov/policy/elsec/leg/essa/160240ehcyguidance072716.pdf>.

# Who are Homeless Children and Youth?

## ***The Definition of Homeless***

The McKinney-Vento definition of the term “homeless children and youths”—

- (A) means individuals who lack a fixed, regular, and adequate nighttime residence...; and
- (B) includes—
  - (i) children and youths who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; or are abandoned in hospitals;
  - (ii) children and youths who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for a human being;
  - (iii) children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and
  - (iv) migratory children who qualify as homeless for this subtitle because the children are living in circumstances described in clauses (i) through (iii)<sup>3</sup>

Eligibility for McKinney-Vento services is dependent on the criteria of "fixed, adequate, and regular" being met. If the primary nighttime residence does not meet all criteria of being "fixed, adequate, and regular," then eligibility for services can be denied. However, the determination should always be made on a case-by-case basis.

Homeless children and youth must have equal access to the same free, appropriate public education (FAPE), including public preschool education, as provided to other children and youth. LEAs must review the requirements in laws, regulations, practices, or policies that may act as a barrier to the identification, enrollment, attendance, or success in school of homeless children and youth.

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<sup>3</sup> 42 U.S.C. § 11434a(2).

# Local Liaison Roles & Responsibilities

## *The Duties of the Local Liaison*

The McKinney-Vento Act includes a "job description" for the local liaison in the form of a list of duties. Local liaisons must ensure that:<sup>4</sup>

- (i) children and youth experiencing homelessness are **identified** by school personnel through outreach and coordination activities with other entities and agencies;
- (ii) children and youth experiencing homelessness are **immediately enrolled** in, and have a full and equal opportunity to succeed in, schools within the district;
- (iii) children, youth, and families experiencing homelessness have access to and **receive educational services** for which they are eligible, including Early Head Start and Head Start programs, early intervention services under Part C of the Individuals with Disabilities Education Act, and other preschool programs administered by the Local Education Agency (LEA);
- (iv) children, youth, and families experiencing homelessness receive **referrals** to health care, dental, mental health, substance abuse, housing, and other appropriate services;
- (v) the parents or guardians of students experiencing homelessness are **informed** of the educational and related opportunities available to their children, and are provided with meaningful **opportunities to participate** in the education of their children;
- (vi) **public notice** of the educational rights of students experiencing homelessness is disseminated in locations frequented by families, and youth experiencing homelessness, including schools, shelters, public libraries, and soup kitchens, in a manner and form understandable to parents, guardians, and unaccompanied youth;
- (vii) enrollment **disputes** are mediated in accordance with the provisions of the Act;
- (viii) parents, guardians, and unaccompanied youth experiencing homelessness are **fully informed of all transportation services available** to McKinney-Vento students, including transportation to the school of origin, and are assisted in accessing transportation;
- (ix) school personnel providing services to students experiencing homelessness receive **professional development** and other support; and
- (x) unaccompanied youth:
  - (xi) are enrolled in school;
  - (xii) have opportunities to meet the same challenging State academic standards as other children and youth; and
  - (xiii) are informed of their status as independent students<sup>5</sup> and receive assistance verifying this status for purposes of the Free Application for Federal Student Aid (FAFSA).

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<sup>4</sup> 42 U.S.C. § 11432(g)(6)(A).

<sup>5</sup> 20 U.S.C. § 1087vv.

## ***McKinney-Vento Homeless Program Timeline of Reminders***

### **July**

- At the start of the new school year, begin identifying students who are eligible for McKinney-Vento services. Utilize the previous school year's year-end status and checkpoints, as well as enrollment form/residency forms for identification. Utilize McKinney-Vento rights and notification forms as students are identified.
- Update homeless poster placements and ensure that the LEA homeless liaison and the state homeless grant manager's contact information is current. Ensure poster locations are documented in writing for easy identification if asked where posters are located.
- Evaluate and update any LEA paperwork, forms, and written policies utilized for the homeless program, including all information is on LEA letterhead, making sure contact information, school year, dates, and policies are correct and meet all requirements.<sup>6</sup>
- Check the LEA's Student Information System (SIS) to ensure that the LEA begins the school year with **zero** (0) students identified as McKinney-Vento eligible.

### **August/September**

- Provide annual McKinney-Vento Enrollment, Identification, Resources, and Support Training to LEA staff, including front office staff, principals, social workers, counselors, teachers, support staff, cafeteria staff, janitors, and bus drivers.
- New McKinney-Vento liaisons must submit an [ePlan User Access Form](#) if they will require access to ePlan.
- New McKinney-Vento liaisons must update ePlan with the correct contact information.
- New McKinney-Vento liaisons are strongly encouraged to participate in the online McKinney-Vento Self-Paced Training provided by the [National Center for Homeless Education \(NCHE\)](#).
- Provide training to LEA- and school-level staff (certified and non-certified) and community partners so they are aware of homeless identification, eligibility, and enrollment procedures.
- Enter eligible students in your SIS and keep your system current throughout the year.
- Seek support from community-based organizations and partners for students (begin to plan for holidays as well).
- Check the accuracy of McKinney-Vento students' identification and alignment with SIS and Education Information System (EIS) uploads.
- Complete the Immunization Report due in ePlan.

### **October/November**

- Ensure McKinney-Vento eligible students are in your SIS and align with EIS uploads for certification.
- The National Association for the Education of Homeless Children and Youth (NAEHCY) Conference is held.
- Check the accuracy of McKinney-Vento students' identification and alignment with SIS and EIS uploads.

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<sup>6</sup> See the [Mandated Policy & Procedures](#) section.

## **December**

- Facilitate and organize support from community-based organizations for children/youth during the holidays (e.g., food and clothing drives).
- Check the accuracy of McKinney-Vento students' identification and alignment with SIS and EIS uploads.

## **January**

- Review McKinney-Vento Programming Enrollment, Identification, Resources, and Support Training with staff at the beginning of the new semester.
- Check the accuracy of McKinney-Vento students' identification and alignment with SIS and EIS uploads.

## **February**

- Check the accuracy of McKinney-Vento students' identification and alignment with SIS and EIS uploads.
- Begin to plan summer programming for McKinney-Vento-identified students.
- Begin planning the McKinney-Vento Free Application for Federal Student Aid (FAFSA) Round-Up Week. A tip sheet for school counselors is available [here](#).

## **March/ April**

- Check the accuracy of McKinney-Vento students' identification and alignment with SIS and EIS uploads.
- Seek support from community-based organizations and partners for students (begin to plan for summer break needs and resources).

## **May/June**

- Verify students' living situation at year-end for prioritization at the beginning of the school year.
- Send an end-of-year letter to McKinney-Vento families. An end-of-year letter sample template can be found [here](#).
- Access what worked well with the homeless program and determine if any changes need to be made.
- Be sure to review data to determine student outcomes and include relevant stakeholders in the assessment process.
- Check the accuracy of McKinney-Vento students' identification and alignment with SIS and EIS uploads.
- The Homeless Immunization Report opens in ePlan.

# Mandated Policy and Procedures

The McKinney-Vento Act is designed to assist students experiencing homelessness to overcome barriers to enrolling, attending, and being successful in school. State educational agencies (SEAs) and LEAs are required to review and revise laws, regulations, practices, or policies that act as barriers to ensure homeless students have the same opportunity to obtain free, appropriate public education as those children and youth who are not experiencing homelessness.<sup>7</sup>

*The McKinney-Vento Act requires each LEA to have specific policies and procedures in place to ensure homeless students have equal access to free and appropriate public education.*

**LEAs should have written policies and procedures focusing on identification, best interest, enrollment, and transportation, as well as a dispute resolution procedure.** To remain in compliance with the McKinney-Vento Act, there are key elements that each policy and procedure should contain. This section may be used as a guide to ensure an LEA's local policy has those necessary elements.

## ***Identification of Homeless Children and Youth***

Every LEA must appoint a local homeless education liaison (hereafter referred to as liaison) to fulfill the duties of the position established by law.<sup>8</sup> One of these duties is to ensure that children and youth in homeless situations are identified by school personnel and through coordination activities with other entities and agencies.<sup>9</sup> Once students are identified, the local liaison must ensure that they receive the services and supports they need to enroll in and have a full and equal opportunity to succeed in school.<sup>10</sup>

A housing questionnaire or nighttime residency form is highly recommended and commonly used to meet requirements around identification. Sample templates can be found below:

- [McKinney-Vento Housing and Educational Rights](#)
- [McKinney-Vento Housing Form](#)

Conversations about a family's housing situation can sometimes be tense, uncomfortable, and/or invasive. This [tip sheet](#) provides trauma-sensitive strategies and conversation starters for some of the most common conversations you will encounter with students, families, and LEA administration.

LEAs must ensure that public notice of the educational rights of homeless children and youth is disseminated in schools, family shelters, soup kitchens, and other places where these children and youth may receive services.<sup>11</sup> To help fulfill this requirement, LEAs may order free homeless informational posters at the [National Center for Homeless Education \(NCHE\) website](#).

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<sup>7</sup> 42 U.S.C. §§ 11431, 11432.

<sup>8</sup> 42 U.S.C. § 11432(g)(1)(J)(ii).

<sup>9</sup> 42 U.S.C. § 11432(g)(6)(A)(i).

<sup>10</sup> 42 U.S.C. § 11432(g)(6)(A)(ii).

<sup>11</sup> 42 U.S.C. § 11432(g)(6)(A)(v).

Identifying children and youth experiencing homelessness can be challenging for many reasons, and unfortunately, homelessness often goes unnoticed by school personnel. Identification challenges may include:

- Students and families may try to hide their homelessness because they are embarrassed or fear they will be judged or stigmatized.
- The fear of losing custody of their children often prevents homeless parents from revealing their living circumstances to school officials.
- Unaccompanied homeless youth may not report their homeless status for fear of being returned to unsafe family environments or taken into the custody of the child welfare system.
- Schools and service providers may be unaware of children and youth who are not enrolled in school and are living in places other than shelters, such as doubled up with another family or in a hotel or motel, due to homelessness.
- Homeless families and unaccompanied homeless youth may not realize that their circumstances fit the McKinney-Vento definition of homeless.
- School personnel may not understand the nature of homelessness or the McKinney-Vento definition of homeless and may not recognize signs that a student has lost housing

To help address these challenges, LEA and school staff should be trained annually on the common signs of homelessness.

### **Additional Strategies to Heighten Identification**

- **Enrollment forms for programs serving at-risk students:** By reviewing the forms for other educational programs, such as the National School Lunch Program; Title I, Part A; Title I, Part C; or 21st Century Community Learning Centers programs, liaisons can quickly identify students who may qualify as homeless. Cooperative agreements with early childhood programs like Head Start can also lead to questions on enrollment or intake forms that result in referrals to the liaison when a homeless child is identified.
- **Quick reference lists:** Keeping a list of local low-cost motels or shelters discreetly located on the desk of enrollment staff for easy reference can help the staff recognize addresses that may indicate homelessness when students enroll.
- **Cooperative enrollment events:** Events like kindergarten round-up and Head Start enrollment fairs provide opportunities to identify more students. Many communities also host events that focus on connecting persons in need with agencies and organizations that can help them, including schools.
- **Relationship building:** By making personal contact with managers at low-cost hotels, social service agencies, local law enforcement, and other public service agencies, liaisons can increase the number of people on the lookout for students in need.
- **LEA website:** The LEA website often contains the student handbook and other important information targeted to students and their families. It can be a great tool for increasing awareness and disseminating information about the rights of homeless students, as well as listing contact information for the liaison.
- **Attendance hearings:** Liaisons may recognize homelessness in students who are under review for attendance problems related to their homelessness, which other staff may miss. By either

participating in behavior review committees or by training truancy and attendance officers, liaisons can increase the identification of homeless students.

## ***Homeless Educational Rights Posters***

Homeless liaisons shall ensure that public notice of the educational rights of homeless children and youth is disseminated where such children and youth receive services under this Act, such as shelters, public libraries, and soup kitchens, in a manner and form understandable to the parents and guardians of homeless children and youth.<sup>12</sup> Most LEAs meet this requirement by posting homeless programming posters in all LEA facilities, as well as in the other places listed above. LEA staff should routinely check to see that posters have not been removed from posted locations and that the current contact information for both the LEA homeless liaison and the state homeless education coordinator is included on the posters.<sup>13</sup>

<b><i>State Homeless Education Coordinator:</i></b>
<i>Vanessa Waters</i>
<i>Phone: (615) 917-3750</i>
<i>Email: <a href="mailto:Vanessa.Waters@tn.gov">Vanessa.Waters@tn.gov</a> (optional)</i>

Posters in school buildings should be hung where children and parents can easily locate and read them, such as:

- building entrances,
- common bulletin boards,
- counselor's/nurse's office,
- hallways, the lunch line,
- locker rooms,
- restrooms, etc.

To protect privacy, posters should be located where students can read them without drawing undue attention to themselves, and the student's age (and height) should be considered when posting in schools.

Community locations may include such places as:

- churches,
- clothing/food banks,
- libraries,
- laundry mats,
- convenience/grocery stores,
- free clinics,
- weekly/monthly rate hotels/motels, shelters,
- post offices

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<sup>12</sup> 42 U.S.C. § 11432(g)(6)(A)(vi).

<sup>13</sup> 42 U.S.C. § 11432(g)(6)(A)(i), (v).

Homeless Rights Posters, along with other McKinney-Vento awareness materials, can be ordered free of charge from [The National Center for Homeless Education](#).

## ***Educational Rights and Privacy Act (FERPA)***

The Family Educational Rights and Privacy Act (FERPA) is a federal law that affords parents the right to have access to their children’s education records, the right to seek to have the records amended, and the right to have some control over the disclosure of personally identifiable information from the education records. When a student turns 18 years old or enters a post-secondary institution at any age, the rights under FERPA transfer from the parents to the student (“eligible student”).<sup>14</sup> FERPA protects education records, including academic report cards, transcripts, class schedules, disciplinary records, and contact/family information. To find more information from the U.S. Department of Education on FERPA, you can visit the [Family Educational Rights and Privacy Act \(FERPA\)](#). Tips for sharing and respecting the privacy of students experiencing homelessness can be found [here](#).

## ***Training and Awareness***

Under the McKinney-Vento Act, homeless liaisons are tasked to:

- ensure that school personnel identify homeless children and youth through outreach and coordination with other entities and agencies;<sup>15</sup>
- ensure that homeless students and their families receive educational services, including Head Start and other preschool programs;<sup>16</sup> referrals to health care, mental health, and dental services, and other appropriate services;<sup>17</sup> and
- coordinating and collaborating with the McKinney-Vento grant manager for homeless education, as well as community and school personnel responsible for the provision of education and related services to homeless children and youth.<sup>18</sup>

Homeless liaisons must provide information and resources to LEA school personnel and community partners. Awareness-raising activities must be designed to heighten the understanding and sensitivity of personnel to the needs of homeless children and youth, their rights, and their specific educational needs.<sup>19</sup>

The [National Center for Homeless Education \(NCHE\)](#) has several types of materials and resources available to help liaisons provide training and raise awareness in their school communities. To find more information from the U.S. Department of Education on FERPA, you can visit the [Family Educational Rights and Privacy Act \(FERPA\)](#). Tips for sharing and respecting the privacy of students experiencing homelessness can be found [here](#).

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<sup>14</sup> 20 U.S.C. § 1232(g); 34 C.F.R. § 99.

<sup>15</sup> 42 U.S.C. § 11432(g)(6)(A)(i).

<sup>16</sup> 42 U.S.C. § 11432(g)(6)(A)(iii).

<sup>17</sup> 42 U.S.C. § 11432(g)(6)(A)(iv).

<sup>18</sup> 42 U.S.C. § 11432(g)(6)(C).

<sup>19</sup> 42 U.S.C. § 11433(d)(3).

## **Eligibility**

To determine a student's McKinney-Vento eligibility, LEAs must determine whether a student's living arrangement meets the McKinney-Vento definition of homeless. Remember to make determinations on a case-by-case basis, considering what is known about each child's or youth's circumstances. To determine McKinney-Vento eligibility, homeless liaisons should gather information about the child's or youth's situation. Gathering needed information can be done by using a housing questionnaire that asks about the child's or youth's living arrangement as part of your LEA's enrollment paperwork. If the questionnaire indicates that the student might be experiencing homelessness, refer the questionnaire to the school point-of-contact or homeless liaison. A sample [McKinney-Vento Housing Questionnaire](#) is made available for use.

Once a student has been identified and is eligible to receive McKinney-Vento services, the parent/guardian or unaccompanied youth should be informed of their rights under the McKinney-Vento Act. A sample [Housing and Education Rights Template](#) is made available for use.

Once the LEA has gathered the needed information, the next step is to determine whether the child's or youth's living arrangement meets the [McKinney-Vento definition of homeless](#). To make a determination of homelessness, consider whether the student's living arrangement fits into one of the specific examples listed in the definition. If not, consider whether the student's living arrangement, although not mentioned explicitly in the law, would be considered homeless because it is not fixed, regular, and adequate.

The department recommends that LEAs consider following the practices mentioned above to ensure that efforts to confirm information about a child's or youth's living arrangements are reasonable, effective, discreet, and in compliance with privacy guidelines. If, after investigating, an LEA concludes that the student is not McKinney-Vento eligible, the LEA must provide the parent, guardian, or unaccompanied youth the opportunity to appeal the LEA's decision through the LEA's McKinney-Vento dispute resolution process.<sup>20</sup>

## **Policies and Procedures**

As noted previously, use a housing questionnaire that incorporates informative yet non-invasive questions about a student's living arrangement as part of your LEA's enrollment paperwork. Use the information gathered on this questionnaire to assist with making determinations of McKinney-Vento eligibility. Avoid using the word "homeless," as it may be off-putting; instead, incorporate questions that describe living arrangements included in the McKinney-Vento definition of homeless.

As required by the McKinney-Vento Act, LEAs must enroll students seeking McKinney-Vento eligibility immediately, even if they are unable to provide the paperwork normally required for enrollment<sup>21</sup> or have missed application or enrollment deadlines during any period of homelessness.<sup>22</sup> Efforts to confirm eligibility should take place once full enrollment has occurred. If, after investigating, an LEA concludes that the student is not McKinney-Vento eligible, the LEA must provide the parent, guardian, or unaccompanied youth the opportunity to appeal the decision using the McKinney-Vento Dispute Resolution Process.<sup>23</sup>

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<sup>20</sup> 42 U.S.C. § 11432(g)(3)(E).

<sup>21</sup> 42 U.S.C. § 11432(g)(3)(C)(i)(I).

<sup>22</sup> 42 U.S.C. § 11432(g)(3)(C).

<sup>23</sup> See the [McKinney-Vento Dispute Resolution Process](#).

## **Best Interest Determination**

The concept of best interest appears in the McKinney-Vento Homeless Assistance Act in relation to a student's school selection options, which include the school of origin and the local attendance area school. The best interest determination should always be based on student-centered factors.<sup>24</sup>

The term “school of origin” means the school that a child or youth attended when permanently housed or the school in which the child or youth was last enrolled, including a preschool.<sup>25</sup> The law also states, “When the child or youth completes the final grade level served by the school of origin, the term ‘school of origin’ shall include the designated receiving school at the next grade level for all feeder schools.”<sup>26</sup>

The local attendance area school means any public school that students living in the same attendance area are eligible to attend.<sup>27</sup>

Students who become homeless over the summer may also remain in their school of origin for the upcoming school year.<sup>28</sup>

Student-centered factors include the impact of mobility on the achievement, education, health, and safety of homeless children and youth.<sup>29</sup> Priority should be given to the request of the child's or youth's parent or guardian or the unaccompanied youth.<sup>30</sup> If the LEA homeless liaison decides it is not in the best interest of the student to remain in the school of origin, a written explanation of the determination must be provided to the parent, guardian, or unaccompanied youth.<sup>31</sup> The explanation must be written in a manner that the parent, guardian, or unaccompanied youth can understand and in a timely manner. While the school of best interest is being determined, the child must be enrolled in the school of the parent's choice until a final decision is made.

The LEA's homeless liaison and other school personnel play a critical role in helping parents, guardians, and unaccompanied youth experiencing homelessness evaluate the best interest. Involving parents and guardians fully in the school selection process can reduce the likelihood of disputes or unnecessary school changes and respect the role of parents and guardians in their child's education. A sample [Best Interest Checklist](#) is made available for use.

## **Enrollment**

The McKinney-Vento Act requires LEAs and schools to enroll students experiencing homelessness immediately, even if the student is unable to provide documents that are typically required for enrollment.<sup>32</sup> The terms “enroll” and “enrollment” include attending classes and participating fully in school activities.<sup>33</sup> The enrollment policy must allow children and youth to immediately enroll in school even if they are not

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<sup>24</sup> 42 U.S.C. § 11432(g)(3)(C).

<sup>25</sup> 42 U.S.C. § 11432(g)(3)(I)(i).

<sup>26</sup> 42 U.S.C. § 11432(g)(3)(I)(ii).

<sup>27</sup> 42 U.S.C. § 11432(g)(3)(A).

<sup>28</sup> 42 U.S.C. § 11432(g)(3)(A)(i).

<sup>29</sup> 42 U.S.C. § 11432(g)(3)(D).

<sup>30</sup> 42 U.S.C. § 11432(g)(3)(A).

<sup>31</sup> 42 U.S.C. § 11432(g)(3)(C).

<sup>32</sup> 42 U.S.C. § 11432(g)(3)(C).

<sup>33</sup> 42 U.S.C. § 11434a(1).

able to produce documents that are typically required for school enrollment.<sup>34</sup> For this purpose, documents are defined as:

- previous academic records,
- records of immunization and other required health records,
- proof of residency,
- proof of guardianship,
- birth certificates, or
- any other documentation necessary for enrollment.

The policy should also include how the LEA will assist the child or youth with obtaining records such as immunizations or other required health records.<sup>35</sup> Record maintenance and timely transfer of records are essential elements of the school enrollment policy.

## ***Transportation***

Transportation policies must provide students experiencing homelessness with transportation comparable to those students who are not experiencing homelessness.<sup>36</sup> The policy must ensure that transportation is provided at the request of the parent or guardian (or, in the case of an unaccompanied youth, the local liaisons) to or from the school of origin, even during enrollment disputes.<sup>37</sup> It is vital to provide the transportation options that are available within the LEA's transportation policy to the parent/guardian or unaccompanied youth once eligibility is determined. A system of providing gas vouchers, cards, or reimbursements may be utilized and funded through Title I, Part A homeless set-aside funds or the McKinney-Vento subgrant. When developing a transportation plan with families, it is important to keep a hard copy of the transportation plan on file. This plan should be reviewed and revised if barriers occur. Transportation arrangements should ensure that a homeless student can participate in the full school day, neither arriving late nor leaving before the school day has ended. The law also requires LEAs to coordinate transportation services with other LEAs.<sup>38</sup> Sample templates focused on transportation are available for LEA and school use: [McKinney-Vento Transportation Options Template](#) and [McKinney-Vento Transportation MOU Template](#).

The McKinney-Vento Act requires schools to immediately enroll homeless students<sup>39</sup> with "enrollment" defined as "attending classes and participating fully in school activities."<sup>40</sup> Therefore, LEAs must arrange transportation without delay.

According to the U.S. Department of Education's (ED) Education for Homeless Children and Youths Program Non-Regulatory Guidance, based on the best interest of the student and in consultation with the parent, the LEA ultimately determines the mode of transportation. While many options exist for transporting homeless students, the mode the LEA selects must align with SEA and LEA pupil transportation policies and safety

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<sup>34</sup> 42 U.S.C. § 11432(g)(3)(C)(i).

<sup>35</sup> 42 U.S.C. § 11432(g)(3)(C)(iii).

<sup>36</sup> 42 U.S.C. § 722(g)(4)(A).

<sup>37</sup> 42 U.S.C. § 722(g)(3)(E)(i).

<sup>38</sup> 42 U.S.C. § 11432(g) (5)(A)(ii).

<sup>39</sup> 42 U.S.C. § 11432(g)(3)(C).

<sup>40</sup> 42 U.S.C. § 11434(a)(1).

standards and must not create a barrier to the student arriving at school on time or cause an undue burden on the parents or student.

## ***Dispute Resolution Procedures***

The law requires SEAs and LEAs to follow a dispute resolution process when parents, guardians, or unaccompanied youth and schools or LEAs disagree on the enrollment or educational placement (i.e., school selection) of homeless children and youth.<sup>41</sup>

The dispute resolution process is intended to represent each party's views for objective consideration so that disagreements can be brought to a close expeditiously. During the dispute process, the law requires that the LEA allow the child or youth to attend the school that their parents or guardians wish them to attend, or the unaccompanied youth wishes to attend, to minimize educational disruption.

Under the McKinney-Vento Act, each LEA must have its own written dispute resolution policy that provides the procedures for resolution at the local level. The policy at the local level must be consistent with the state-level policy, which can be found in [ePlan.tn.gov > TDOE Resources > ESSA Guidance, PPTs, & Webinars > Title IX, Part A Education for Homeless Children & Youth > Resources for Homeless Liaisons > McKinney-Vento State-Level Dispute Resolution](#).

### **Tips for Establishing an Effective Dispute Resolution Process**

In establishing a strong, effective dispute resolution process, LEAs should include the following items in information distributed to parents, guardians, or unaccompanied youth when discussing decisions regarding enrollment:

- Notice of the right to file a complaint, raise a compliance issue, or file an appeal;
- A step-by-step description of how to appeal the school's decision that includes a simple form parents, guardians, or unaccompanied youth can complete and submit to the school to initiate the dispute process. Copies should be provided to the parent, guardian, or youth for their records;
- Notice that, if the parent, guardian, or unaccompanied youth is an English learner, uses a native language other than English, or needs additional supports because of a disability, translators, interpreters, or other support services will be made available in the appropriate language without charge;
- Notice of the right to be enrolled immediately in the school in which enrollment is sought pending final resolution of the dispute;
- Notice that immediate enrollment includes receiving adequate and appropriate transportation to and from the school of origin and the ability to fully participate in all school activities;
- List of legal and advocacy service providers in the area that can provide additional assistance during any part of the process;
- Contact information for the local liaison and state coordinator, with a brief description of their roles; and
- Timelines for resolving LEA- and state-level appeals.

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<sup>41</sup> 42 U.S.C. § 11432(g)(1)(C).

These processes may also include any administrative procedures adopted by the LEA for addressing matters such as parent or student complaints, attendance, credit recovery, or grade placement. In some circumstances, additional concerns may be appropriately addressed in an Individualized Education Program (IEP) team meeting or a Section 504 placement team meeting. Other appropriate processes may include the investigation of matters related to bullying, sexual harassment, or illegal discrimination. A sample LEA-level dispute resolution process can be found [here](#).

## ***Collaborations***

The McKinney-Vento Act requires a community-based approach to homelessness and education. LEAs cannot meet the needs of families and youth experiencing homelessness alone. Homelessness is a community-wide problem, requiring a community-wide response that includes measures to address housing, health care, and employment, along with school attendance and success. Without the support of local agencies, local homeless education liaisons cannot identify and serve all the children and youth experiencing homelessness in the LEA.

Although initiating community collaborations requires time, energy, effort, and good communication, the returns on that investment can be remarkable. Collaborating with community organizations and agencies will make the LEA's McKinney-Vento program more robust and successful.

Liaisons should identify the needs of their programs by conducting a self-assessment of McKinney-Vento student and family needs. Determine what needs are pressing and what needs can be pushed out to a later date. Liaisons are encouraged to identify local area community members who may have the services they need to support the LEA's homeless program.

## **National School Meals Programs**

The McKinney-Vento Act establishes that homeless children are categorically eligible for free meal benefits under the National School Lunch and School Breakfast Programs. These students and families do not have to complete an application for free meals. Rather, United States Department of Agriculture (USDA) policies allow for expedited enrollment of these students to ensure they receive meals quickly.<sup>42</sup>

For more support and resources, visit:

- [U.S. Department of Agriculture Food and Nutrition Service](#)
- [Feeding America](#)

## **Head Start**

The Head Start program offers grants to public and private nonprofit and for-profit agencies to provide comprehensive child development services to economically disadvantaged children (aged three through five) and their families. Additionally, the Early Head Start program, established in 1995, serves families with children aged birth to three. Congress amended the latest version of the Head Start Act in 2007, adding many new provisions related to homeless children, including:

- adopting the McKinney-Vento Act's definition of homeless;
- qualifying homeless children as automatically eligible for Head Start services; and

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<sup>42</sup> National School Lunch Act, 42 U.S.C. § 1751 et seq.

- mandating that the U.S. Department of Health and Human Services issue regulations that require Head Start agencies to:
- identify and prioritize homeless children for enrollment;
- allow homeless families to apply to, enroll in, and attend Head Start programs while required documents are obtained within a reasonable time frame; and
- establish coordination between local Head Start programs and local homeless liaisons.<sup>43</sup>

For more information on Head Start, visit:

- [Head Start Services](#)
- [U.S. Department of Education Early Learning](#)

### **Runaway and Homeless Youth Act (RHYA) Program**

The RHYA authorizes three programs that address the needs of runaway youth and youth experiencing homelessness.<sup>44</sup> A brief description of the three programs is provided below.

- Basic Center Programs meet the immediate needs of runaway and homeless youth by providing emergency shelter, food, clothing, counseling, and referrals for health care. These shelters can serve youth under 18 years old for up to 21 days. To learn more, see the fact sheet available [here](#).
- Transitional Living Programs provide long-term residential services to help homeless youth ages 16 through 21 successfully transition to self-sufficient living. A fact sheet on Transitional Living Programs funded by the RHYA is available [here](#).
- Street Outreach Programs offer outreach, services, and referrals to youth living on the street to move them into stable housing and prepare them for independence. By achieving these goals, the program also prevents sexual abuse and exploitation.

For additional support on Runaway and Homeless youth, visit:

- [National Center for Homeless Education](#)
- [Runaway and Homeless Youth Act \(RHYA\)](#)
- [Family and Youth Services Bureau](#)

### **Local Social Services or Human Services Agencies**

Temporary Assistance for Needy Families (TANF) funds can be used to help families avoid homelessness.<sup>45</sup> The funds can be used for short-term assistance, such as rent or utility payments, without triggering the 60-month lifetime limit for assistance. As long as the funds are used to pay crisis-related, non-recurring expenses, they can be used by a family more than once a year. For example, a family could receive assistance for overdue rent, a car repair, and to bring utilities current within the same year.

For more support and resources, visit:

- [TN Families First](#)
- [TN Department of Human Services](#)

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<sup>43</sup> Head Start Act, 42 U.S.C. § 9801.

<sup>44</sup> Runaway and Homeless Youth Act (RHYA), 42 U.S.C. § 5601 et seq.

<sup>45</sup> Temporary Assistance for Needy Families (TANF), 42 U.S.C. § 601 et seq.

## Supplemental Nutrition Assistance Program (SNAP)

Formerly known as the Food Stamp Program, SNAP helps people with low incomes buy food.<sup>46</sup> Although it is a federal government program, SNAP is administered by state or local agencies.

For more support and resources, visit:

- [SNAP-ED Connection](#)
- [TN SNAP Nutrition Information](#)
- [Tennessee State SNAP-Ed Program](#)

## U. S. Department of Housing and Urban Development (HUD)

HUD currently administers a [variety of programs](#) dedicated to preventing or ending homelessness within the United States. They also collaborate with other Federal agencies for similar programs and administer the funding for several [mainstream resource programs](#) that provide resources to low-income persons, in addition to those experiencing homelessness.<sup>47</sup>

The [Continuum of Care \(CoC\) Program](#) is designed to promote community commitment to ending homelessness; provide funding for nonprofits and government entities to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused by homelessness; promote access to and effective utilization of mainstream programs; and optimize self-sufficiency among those experiencing homelessness. Communities that receive CoC funds have participated in an extensive needs assessment, including the identification of existing resources, agencies, and services.

For additional support on COCs, visit:

- [Continuum of Care \(CoC\) Program](#)
- [West TN CoC](#)
- [East TN CoC](#)
- [Upper Cumberland/ Middle TN CoC](#)

## Institutions of Higher Education

Unaccompanied homeless youth can be qualified as “independent students” for the purposes of filling out the FAFSA.<sup>48</sup> Financial aid administrators are directed to obtain verification of this status from liaisons, if possible, when determining the financial aid available.

For more information on Higher Education support and resources, visit:

- [U.S. Department of Education](#)
- [Federal Student AID \(FAFSA\)](#)

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<sup>46</sup> Supplemental Nutrition Assistance Program (SNAP), 7 U.S.C. § 2011 et seq.

<sup>47</sup> McKinney-Vento Homeless Assistance Act as amended by the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009, 42 U.S.C. § 11301 et seq.

<sup>48</sup> Higher Education Act, 20 U.S.C. § 1001 et seq.

# School Counselor Roles and Supports

## ***Unaccompanied Youth Experiencing Homelessness***

The partnership between the local liaison and the school counselor is a critical element in promoting awareness of McKinney-Vento requirements and the educational rights of students experiencing homelessness.<sup>49</sup> By working together to ensure that all key stakeholders, including parents, students, teachers, and administrators, know the McKinney-Vento definition of homelessness and the supports available to McKinney-Vento eligible students, students, and their families can receive needed support as early as possible.

The McKinney-Vento Act defines unaccompanied youth as “a homeless child or youth not in the physical custody of a parent or guardian.”<sup>50</sup> Taking a closer look at the definition, two conditions must be present for a child or youth to be considered an unaccompanied youth under the McKinney-Vento Act:

1. The child’s or youth’s living arrangement meets the Act’s definition of homeless, and
2. The child or youth is not in the physical custody of a parent or guardian. Physical custody refers to where a child or youth is physically living; as such, a child or youth who is not in the physical custody of a parent or guardian is a child or youth who is not living with a parent or guardian. It is important to note, however, that the presence of a custody or guardianship issue alone would not make a student eligible for McKinney-Vento services; rather, the student’s living arrangement also must be considered homeless.

McKinney-Vento eligible students, including unaccompanied youth, are entitled to enroll in school immediately, even if lacking documents normally required for enrollment or having missed application or enrollment deadlines during any period of homelessness.<sup>51</sup>

An [Unaccompanied Youth Eligibility Flowchart](#) can be found on the NCHE website, and a sample Caregiver Authorization Form can be found [here](#). This form aims to address the McKinney-Vento Homeless Assistance Act requirement that homeless children have access to education and other services for which they are eligible. The McKinney-Vento Homeless Assistance Act states specifically that barriers to enrollment must be removed. While the McKinney-Vento Act does not specify a method that must be used to enroll unaccompanied youth, many LEAs have developed self-enrollment forms, caregiver affidavits, or other forms to replace typical proof of guardianship.

## ***Post-Secondary Education***

The McKinney-Vento Act requires school counselors to support students experiencing homelessness in the area of college and career readiness.<sup>52</sup> Unfortunately, despite the important role that school counselors play in college and career counseling, their work may be hindered by large caseloads and insufficient college-

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<sup>49</sup> Strawser, S., Markos, P.A., Yamaguchi, B.J., & Higgins, K. (2000). A new challenge for school counselors: Children who are homeless. *Professional School Counseling*, 3(3), 162-172.

<sup>50</sup> 42 U.S.C. § 11434(a)(6).

<sup>51</sup> 42 U.S.C. § 11432(g)(3)(C)(i).

<sup>52</sup> 42 U.S.C. § 11432(g)(1)(K).

counseling information, particularly in lower-resourced schools.<sup>53</sup> In schools with lower ratios of students to counselors, attendance rates were higher, and discipline rates were lower.<sup>54</sup> This suggests that in schools where students may benefit the most from school counselors, such as high-poverty schools with increased numbers of students experiencing homelessness, services are not as readily available as they are in schools where there are more resources. Therefore, it is important for LEAs to further explore the role of the school counselor and how they can support the college and career preparation of students experiencing homelessness.

The best solution to ending the cycle of homelessness is for students to pursue post-secondary education. At the beginning of every year, with the help of the school counselor (or a teacher “coach” who works with unaccompanied youth), begin to prepare students for college and career readiness. LEAs should ensure that school counselors obtain additional training in working with students experiencing homelessness so they may provide the more extensive support needed to ensure that this population of students is college and career-ready. NCHC has a wealth of information and resources on its [Access to Higher Education for Students Experiencing Homelessness](#) webpage, and additional templates focused on the FAFSA process can be found below:

- [FAFSA Round-Up Week Tips for School Counselors](#)
- [Sample Letter of FAFSA Round-Up Week Student Template](#)

Students who wish to receive federal aid to pay for post-secondary education must submit a FAFSA each year they are enrolled in a post-secondary education institution. However, many students experiencing homelessness may have difficulties navigating the FAFSA process. This would be the perfect opportunity to host a McKinney-Vento FAFSA Week. The National Association for the Education of Homeless Children and Youth (NAEHCY) has created a [FAFSA toolkit](#) that contains helpful resources and tools for local liaisons, including ideas for holding FAFSA-focused events. Additionally, many states and institutions use the information collected through the FAFSA to determine eligibility for state, institutional, and other aid, so students should complete their FAFSA as soon as possible to ensure maximum aid eligibility.

Unaccompanied homeless youth are eligible to apply for the FAFSA as an independent. The McKinney-Vento Act requires local liaisons or counselors to inform unaccompanied homeless youth of their status as independent students and help them obtain verification of that status. To support the implementation of this policy, a sample letter to help determine the independent student status of unaccompanied homeless youth for the FAFSA can be found [here](#). The unaccompanied homeless youth must submit an affidavit every year for verification if they are enrolled in a post-secondary school.

For additional FAFSA support, see:

- [FAFSA Fixes for Homeless and Foster Youth Q&A](#)
- [The FAFSA Simplification Act: Youth Experiencing Homelessness and Youth with Experience in Foster Care](#)

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<sup>53</sup> Perna, L., Rowan-Kenyon, H., Thomas, S., Bell, A., Anderson, R., & Chunyan, L. (2008). The role of college counseling in shaping college opportunity: Variations across high schools. *The Review of Higher Education*, 31(2), 131-159. <https://doi.org/10.1353/rhe.2007.0073>.

<sup>54</sup> Clemens, Elysia & Carey, John & Harrington, Karen. (2010). The School Counseling Program Implementation Survey: Initial Instrument Development and Exploratory Factor Analysis. *Professional School Counseling*. 14. 125-134.

# Funding Sources

## Overview

The LEA's homeless education program can be funded through two funding sources: the ESSA Title I, Part A homeless district set-aside and the McKinney-Vento subgrant. To identify and address the needs of students experiencing homelessness more effectively, both the McKinney-Vento Act and Title I, Part A require cross-program coordination.

Local liaisons must coordinate and collaborate with other school personnel responsible for providing services to students experiencing homelessness.<sup>55</sup> Title I, Part A requires that programs operated under its authority coordinate at the state and local levels. All LEAs receiving Title I, Part A funds must include in their local plans a description of how the LEA's Title I, Part A program is coordinated with its McKinney-Vento program.<sup>56</sup> The development of the local plan should include timely and meaningful consultation with the local liaison,<sup>57</sup> and must describe the Title I, Part A services that will be provided to students experiencing homelessness, including through the homeless set-aside.<sup>58</sup> In addition to meeting each program's statutory requirements, cross-program coordination provides an opportunity to optimize resource allocation. In order to meet the needs of all students, including students experiencing homelessness, it is critical that both programs work together to leverage resources to the greatest extent possible.

It is also important to note that children and youth experiencing homelessness are automatically eligible for Title I, Part A services, whether or not they attend a Title I, Part A school or meet the academic standards required of other students for eligibility.<sup>59</sup>

## ***Title I, Part A Homeless District Set-Aside Funds***

The purpose of Title I, Part A of ESEA, is to provide all children with a fair, equitable, and high-quality education and to close educational achievement gaps.<sup>60</sup> Title I, Part A, is designed to meet the educational needs of low-achieving children in schools with the highest levels of poverty by aligning high-quality assessments, systems of accountability, teacher preparation, curriculum, and instructional materials with challenging State academic standards. Children and youth experiencing homelessness are automatically eligible for Title I, Part A services, whether or not they attend a Title I, Part A school or meet the academic standards required of other students for eligibility.<sup>61</sup> Title I, Part A eligibility allows students in homeless situations who are doing well academically to receive additional non-instructional education-related support services needed to succeed in school.

Title I, Part A, funds two types of school programs:

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<sup>55</sup> 42 U.S.C. § 11432(g)(6)(C).

<sup>56</sup> 20 U.S.C. § 6312(a)(1)(B).

<sup>57</sup> 20 U.S.C. § 6312(a)(1)(A).

<sup>58</sup> 20 U.S.C. § 6312(b)(6).

<sup>59</sup> 20 U.S.C. § 6315(c)(2)(E); U.S. Dep't. of Educ., Education for Homeless Children and Youths Program Non-Regulatory Guidance (July 27, 2016), <http://www2.ed.gov/policy/elsec/leg/essa/160240ehcyguidance072716.pdf>.

<sup>60</sup> 20 U.S.C. § 6301 et seq.

<sup>61</sup> 20 U.S.C. § 6315(c)(2)(E).

- **Schoolwide programs:** These programs serve all students within the school, and seek to upgrade the school's entire educational program to ensure that all students, particularly those who are low achieving, attain high levels of academic proficiency.
- **Targeted assistance programs:** These programs target assistance to students identified as most at risk of not meeting state academic standards

Each LEA that receives a Title I, Part A allocation must reserve a sufficient portion of funds to provide services to students experiencing homelessness that are comparable to those provided to students in Title I schools. Homeless set-aside funds may be used to provide comparable services to students experiencing homelessness who do not attend a Title I school but also may be used to provide services to students experiencing homelessness, including those attending Title I schools, that are not ordinarily provided to other Title I students, including funding the local liaison position, and funding transportation to and from the school of origin.<sup>62</sup>

Title I, Part A, homeless district set-aside funds are governed by two principles:

1. The services provided with these funds must be reasonable and necessary to assist students experiencing homelessness to take advantage of educational opportunities.<sup>63</sup>
2. The funds must be used only as a last resort when funds or services are not available from other public or private sources.<sup>64</sup>

While the homeless set-aside is required for Title I, there is no mandated amount or percentage in the statute. Determining the homeless set-aside amount requires collaboration between the LEA's Title I, Part A, and McKinney-Vento programs. The set-aside should be determined based on an assessment of the needs of students experiencing homelessness within the LEA, considering both the number and needs of these students.<sup>65</sup> Various methods can be used to calculate the set-aside amount.

Once an LEA has identified the needs of students experiencing homelessness to be addressed, the amount of funding necessary to provide services should be determined. Methods to calculate the set-aside amount may include:

- Multiply the number of students experiencing homelessness by the Title I, Part A per-pupil allocation.
- Match the amount of McKinney-Vento subgrant dollars received by the LEA, if applicable.
- Adjust previous set-aside amounts based on past set-aside expenditures and trend data (academic outcome and educational needs, changes in poverty levels and/or economy in the community, number of students experiencing homelessness).
- Reserve the set-aside amount based on free or reduced-price lunch count.

### ***Title I, Part A Homeless District Set-Aside Allowable Use of Funds***

Title I, Part A, homeless district set-aside funds may be used for, but are not limited to, the following:

- items of clothing necessary to meet a school's dress or uniform requirement;

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<sup>62</sup> U.S. Dep't. of Educ., Education for Homeless Children and Youths Program Non-Regulatory Guidance (July 27, 2016), <http://www2.ed.gov/policy/elsec/leg/essa/160240ehcyguidance072716.pdf>; 20 U.S.C. § 6313(c)(3)(C)(ii).

<sup>63</sup> Ibid.

<sup>64</sup> Ibid.

<sup>65</sup> 20 U.S.C. § 6313(c)(3)(C)(i).

- clothing and shoes necessary to participate in physical education classes;
- student fees that are necessary to participate in the general education program;
- personal school supplies;
- birth certificates necessary to enroll in school;
- immunizations;
- food;
- personal hygiene products;
- medical and dental referral services;
- eyeglasses and hearing aids;
- counseling services to address issues related to homelessness that are impeding learning;
- outreach services to students living in shelters, motels, and other temporary residences;
- extended learning time (i.e., before and after school, Saturday classes, summer school) to compensate for the lack of quiet time for homework in shelters or other overcrowded living conditions;
- tutoring services, especially in shelters or other locations where homeless students live;
- family engagement specifically oriented to reaching out to families of homeless students;
- fees for Advanced Placement (AP) and International Baccalaureate (IB) testing;
- Cap and gown for graduation;
- fees for college entrance exams such as the SAT or ACT; and
- GED testing for school-age students.<sup>66</sup>

### ***McKinney-Vento Allowable Activities***

Allowable activities under the McKinney-Vento Act, including those funded with the Title I, Part A Homeless District Set-Aside, may consist of, but are not limited to, the following:<sup>67</sup>

1. The provision of tutoring, supplemental instruction, and enriched educational services that are linked to the achievement of the same challenging State academic standards as the State establishes for other children and youth.<sup>68</sup>
2. The provision of expedited evaluations of the strengths and needs of homeless children and youth,<sup>69</sup> including needs and eligibility for programs and services (such as educational programs for gifted and talented students, children with disabilities, and English learners, services provided under Title I of the ESSA or similar State or local programs, programs in career and technical education, and school nutrition programs).
3. Professional development and other activities for educators and specialized instructional support personnel that are designed to heighten the understanding and sensitivity of such personnel to the needs of homeless children and youth, the rights of such children and youth under this part, and the specific educational needs of runaway and homeless youth.<sup>70</sup>

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<sup>66</sup> U.S. Dep't. of Educ., Education for Homeless Children and Youths Program Non-Regulatory Guidance (July 27, 2016), <http://www2.ed.gov/policy/elsec/leg/essa/160240ehcyguidance072716.pdf>

<sup>67</sup> 42 U.S.C. §§ 11432(g)(6), 11433(d).

<sup>68</sup> 42 U.S.C. § 11433(d)(1).

<sup>69</sup> 42 U.S.C. § 11433(d)(2).

<sup>70</sup> 42 U.S.C. § 11433(d)(3).

4. The provision of referral services to homeless children and youth for medical, dental, mental, and other health services.<sup>71</sup>
5. The provision of assistance to defray the excess cost of transportation is not otherwise provided through Federal, State, or local funding, where necessary to enable students to remain in their school of origin.<sup>72</sup>
6. The provision of developmentally appropriate early childhood education programs, not otherwise provided through Federal, State, or local funding, for preschool-aged homeless children.<sup>73</sup>
7. The provision of services and assistance to attract, engage, and retain homeless children and youth, particularly homeless children and youth who are not enrolled in school, in public school programs and services provided to non-homeless children and youth.<sup>74</sup>
8. The provision for homeless children and youth of before- and after-school, mentoring, and summer programs in which a teacher or other qualified individual provides tutoring, homework assistance, and supervision of educational activities.<sup>75</sup>
9. If necessary, the payment of fees and other costs associated with tracking, obtaining, and transferring records necessary to enroll homeless children and youths in school, including birth certificates, immunization or other required health records, academic records, guardianship records, and evaluations for special programs or services.<sup>76</sup>
10. The provision of education and training to the parents and guardians of homeless children and youths about the rights of, and resources available to, such children and youth, and other activities designed to increase the meaningful involvement of parents and guardians of homeless children or youth in the education of such children or youth.
11. The development of coordination between schools and agencies providing services to homeless children and youth to expand and enhance such services. Coordination with programs funded under the Runaway and Homeless Youth Act must be included in this effort.<sup>77</sup>
12. The provision of specialized instructional support services (including violence prevention counseling) and referrals for such services.<sup>78</sup>
13. Activities to address the particular needs of homeless children and youth that may arise from domestic violence and parental mental health or substance abuse problems.<sup>79</sup>
14. The adaptation of space and purchase of supplies for any non-school facilities serving eligible students and adapting these facilities to enable them to provide services.<sup>80</sup>

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<sup>71</sup> 42 U.S.C. § 11433(d)(4).

<sup>72</sup> 42 U.S.C. § 11433(d)(5).

<sup>73</sup> 42 U.S.C. § 11433(d)(6).

<sup>74</sup> 42 U.S.C. § 11433(d)(7).

<sup>75</sup> 42 U.S.C. § 11433(d)(8).

<sup>76</sup> 42 U.S.C. § 11433(d)(9).

<sup>77</sup> 42 U.S.C. § 11432(g)(5)(A)(i).

<sup>78</sup> 42 U.S.C. § 11433(d)(12).

<sup>79</sup> 42 U.S.C. § 11433(d)(13).

<sup>80</sup> 42 U.S.C. § 11433(d)(14).

15. The provision of school supplies, including those supplies to be distributed at shelters or temporary housing facilities, or other appropriate locations.<sup>81</sup>
16. The provision of other extraordinary or emergency assistance is needed to enable homeless children and youths to attend school and participate fully in school activities.<sup>82</sup>

### **Joint Strategies for Title I, Part A and McKinney-Vento Programs**

- Locate Title I and homeless education program offices nearby to facilitate cross-program communication.
- Partner to provide joint Title I, Part A and McKinney-Vento program training and materials.
- Share handbooks for Title I, Part A and homeless education programs, along with other resources related to serving students experiencing high poverty and mobility, with program staff.

### ***McKinney-Vento Subgrant***

The McKinney-Vento subgrant is awarded to LEAs through a competitive grant.<sup>83</sup> SEAs must consider the needs of homeless children and youth and the ability of the LEA to meet students' needs in determining subgrant awards.<sup>84</sup> Also, the SEA must consider the quality of the grant application to deem the LEA eligible to receive the McKinney-Vento subgrant. An LEA that seeks a McKinney-Vento award must submit to its SEA an application that contains the following information:

- An assessment of the educational and related needs of homeless children and youth in the area served by the LEA;
- A description of the services and programs that the LEA will provide to address these needs;
- An assurance that the LEA meets the fiscal effort requirement;
- An assurance that the LEA will use subgrant funds in compliance with ESSA § 722(g)(3)–(7) of the McKinney-Vento Act;
- A description of policies and procedures that the LEA will implement to ensure that its activities will not isolate or stigmatize homeless children and youth;
- An assurance that the LEA will collect and promptly provide data requested by the State Coordinator pursuant to ESSA § 722(f)(1)–(3); and
- An assurance that the LEA will meet the requirements of ESSA § 722(g)(3) regarding LEA requirements.

In Tennessee, the department awards the McKinney-Vento subgrant on a three-year grant cycle. The state coordinator will announce when the subgrant cycle is available and will provide technical assistance about the grant process prior to the opening of the cycle. Subgrant recipients must complete a Mid-Year Performance Report and Closeout Report annually, within the grant cycle, to renew the grant for the upcoming year. The next McKinney-Vento subgrant competition will occur in the summer of 2025. For more information, see the department's FY26 [McKinney-Vento Subgrant Guide](#).

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<sup>81</sup> 42 U.S.C. § 11433(d)(15).

<sup>82</sup> 42 U.S.C. § 11433(d)(16).

<sup>83</sup> 42 U.S.C. § 11433(c)(1).

<sup>84</sup> 42 U.S.C. § 11433(c)(2).

# Annual Reports

## ***Data Supports Program Compliance***

The McKinney-Vento Act requires SEAs to collect data and provide that data to the federal government.<sup>85</sup> Data is used to help make a determination for subgrant awards; ensure compliance with Title I, Part A requirements; and create required reports for Congress, the general public, department staff, and other government officials.

Data collection begins at the school and LEA levels. Each LEA has a local liaison for homeless education who is responsible for ensuring the identification of homeless students through coordinated activities with other school personnel and community agencies.<sup>86</sup> The liaison is also responsible for working with the LEA's data staff and the State Coordinator to ensure the LEA provides accurate data that meets the required elements outlined by the Secretary of Education.

LEAs should ensure that they have strong and consistent procedures focused on student coding. Training should be provided to any LEA- or school-level staff involved in the process to ensure eligible students are being coded correctly and in a timely manner. Liaisons must review data prior to submission to the SEA to ensure it accurately represents both homeless students and the LEA. For more information on the accurate coding of students experiencing homelessness, see the [Federal Programs and Oversight Data Manual](#), found in [ePlan.tn.gov > TDOE Resources > Federal Programs and Oversight > FPO Data](#).

## ***Homeless Immunization Report***

In Tennessee, the commissioner of education is required by state law to report annually the number of homeless children that are enrolled in public schools without immunization or proof of immunization and the average length of time required for the children to be immunized or to obtain immunization records.<sup>87</sup> The McKinney-Vento grant manager will communicate deadlines and provide guidance for the homeless immunization report to local liaisons each year. The Homeless Immunization Report One-Pager can be found [here](#).

# Promising Practices

## ***Helpful Practices for the Homeless Education Program***

### **Mindset: Homelessness is not Permanent**

There are many stigmas associated with being homeless, and many of these stigmas can leave students and families with feelings of guilt and shame. Consider the verbiage used when describing a person because it can be seen as demoralizing. Your choice of words can make a significant impact on families' receptiveness to a program. For example, Rutherford County Schools provides services for "families in transition" through

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<sup>85</sup> 42 U.S.C. § 11432(f).

<sup>86</sup> 42 U.S.C. § 11432(g)(6)(A)(i).

<sup>87</sup> Tenn. Code Ann. § 49-6-5001.

its Academic Time Leads to Achieving Students (ATLAS) program. Having an impactful name makes it easier to present your services to families who are in need.

## **Meeting the Need**

While items such as food, clothing, and school supplies are a need for students, keep in mind that McKinney-Vento and Title I, Part A homeless set-aside funds can be used for much more! Students experiencing homelessness, in most cases, are dealing with very traumatic experiences. Funding can also be used to provide programs that address the needs that stem from domestic violence and parental mental health or substance abuse programs<sup>88</sup> and programs that are developmentally appropriate for preschool-aged youth.<sup>89</sup>

Youth experiencing homelessness are also eligible to receive expedited evaluations to determine if there is a need for disability services under the Individuals with Disabilities Education Act (IDEA)<sup>90</sup> and Section 504.<sup>91</sup> It is key to ensure that homeless children and youth with disabilities receive the full range of services to meet their complex needs. The following are three key strategies to increase the collaboration between LEA homeless and special education programs:

1. Create and promote policies and practices for regular, ongoing communication and collaboration among the homeless program and special education staff.
2. Review and, if necessary, revise state and local policies and practices to remove barriers and ensure the necessary tools are available to address complex situations creatively, flexibly, and expeditiously.
3. When a complex situation related to a specific student arises, work as a team, utilizing a clear and consistent process to resolve the situation.

## **Look for New Ways**

The needs of students often change from year to year. Evaluate your program regularly and involve staff, students, families, and community members in that evaluation. Look at multiple data sources to determine if your program is meeting its goals and objectives. In addition to academic data, it is also important to examine data points around attendance, student participation in extracurricular activities, and social-emotional well-being as well. Also, use the results from other program-related assessments, such as the department's Results-Based Monitoring process, to help strengthen areas of your program.

## **Engage**

Parent and family engagement activities can provide families with the opportunity to build and strengthen relationships with the school and, most importantly, within their own families. Title I, Part A homeless set-aside and McKinney-Vento subgrant funds can be used to fund such activities.

*Sample Engagement Steps:*

- Teachers or family-school liaisons can contact new families immediately in person or by phone and give them all the information they need. By interviewing families, educators can more fully understand and appreciate families' circumstances and explain the options that are available for their child(ren).

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<sup>88</sup> 42 U.S.C. § 11433(d)(13).

<sup>89</sup> 42 U.S.C. § 11433(d)(5).

<sup>90</sup> 20 U.S.C. § 1400-1444.

<sup>91</sup> 29 U.S.C. § 794.

- Discuss the impact of school transfers with families, as well as what the school and family can do to help the student through the transition.
- Have information packets ready for families who enter after the beginning of the school year.
- Provide more detailed information in the school records of highly mobile students to allow future teachers to better determine academic and course enrollment options.
- Have a system for forwarding complete records to new schools or LEAs quickly.
- Provide packets to help families organize their student's academic records.
- Provide school brochures to local shelters to encourage children's attendance by providing parents with information about enrollment procedures and transportation.
- Provide opportunities for homeless parents to meet with teachers and support staff to share information about their child and to receive information about their child's progress in school.
- Discuss barriers faced by the family and help link the family to service providers.
- At homeless shelters, provide teams consisting of staff and parents of homeless students to answer questions, help fill out forms, provide general support to parents, and check on students who are absent frequently.
- Provide tutoring, homework help, or credit recovery after school at the school building or community locations (e.g., homeless shelters, churches) to help students with their academic progress. Provide snacks or full meals.
- Ensure that at least one adult in the school (e.g., a teacher, administrator, support staff member) serves as a supportive, caring adult in the child's life while he or she is attending the school. For more information and guidance around parent and family resources, visit the [Parent Resources section](#) of the NCHC site.

## Support Services

Often, students who are experiencing homelessness may have needs that initially appear to be beyond our control. Having a resource manual that outlines what supports are available in the community and school can educate families on how to meet their needs. Below are best practices when developing support services manuals.

### 1. Add local contact information.

- Ensure information is current for contacts/agencies you have used in the past.

### 2. Vet your sources.

- Call any contacts/agencies you do not already know to confirm the services provided.
- Whenever possible, visit in person, so you can let families know what to expect.
- **Note:** Do not refer families to agencies you have not vetted.
- Touch base with colleagues who may have additional information.

### 3. Spread the word.

- Distribute photocopies of the referral lists to families and youth.
- Create a binder with the referral lists and additional paper to be kept in a central school location, like the front office. Let school staff know where to find the information and leave notes for one another about helpful connections and referrals.
- Update the referral lists on an ongoing basis.

# Resources for Local Liaisons

## ***Department Resources***

- [ePlan > TDOE Resources](#) > ESSA Information, Guidance, PPTs, & Webinars > Title IX, Part A Education for Homeless Children & Youth
- [Kidcentral TN](#)
- [Supplemental Nutrition Assistance Program \(SNAP\)](#)
- [Tennessee Head Start](#)
- [TN Vaccines for Children \(VFC\) Program](#)

## ***Federal Resources***

- [Continuum of Care \(CoC\)](#)
- [Federal Student Aid](#)
- [Federal Student Aid Application and Verification Guide](#)
- [Higher Education For Students Experiencing Homelessness](#)
- [Homeless Liaison Toolkit](#)
- [National Association for the Education of Homeless Children and Youth](#)
- [National Center for Homeless Education \(NCHE\)](#)
- [The U.S. Department of Housing \(HUD\)](#)
- [U.S. Department of Education Homeless Student Fact Sheet](#)
- [U.S. Department of Education Education for Homeless Children and Youths Program Non-Regulatory Guidance](#)

## ***Non-Profit Resources***

- [National Association for the Education of Homeless Children and Youth](#)
- [Schoolhouse Connection](#)
- [United Way Tennessee: 211](#)

# Appendix A: Sample Templates

[Sample End-of-Year Reverification Letter](#)

[McKinney-Vento Housing Questionnaire Template](#)

[McKinney-Vento Housing Form Template](#)

[McKinney-Vento Housing and Education Rights Form Template](#)

[Tips for Challenging Conversations about Housing](#)

[Best Interest School Selection Checklist](#)

[McKinney-Vento Transportation Options Sample](#)

[McKinney-Vento Transportation Memorandum of Understanding \(MOU\) Template](#)

[McKinney-Vento FAFSA Round-Up Week Tips for School Counselors](#)

[McKinney-Vento FAFSA Round-Up Week Sample Email to Students](#)

[McKinney-Vento Caregiver Authorization Form](#)

[Independent Student Status of Unaccompanied Homeless Youth Determination for the FAFSA](#)

[Tips for Sharing and Respecting the Privacy of Homeless Children and Youth](#)