Office of Safe and Healthy Students (OSHS) Monitoring Plan for Homeless and Neglected or Delinquent Education Programs

December 2014

I. INTRODUCTION

Monitoring the implementation of Federal programs and the use of Federal program funds is an essential function of the U.S. Department of Education (ED). This document, designed for the 2014-2015 school year, describes the purpose, rationale, and process used by the Office of Safe and Healthy Students (OSHS) in monitoring the use of Title I, Part D and the McKinney-Vento Education for Homeless Children and Youth (EHCY) program funds by State educational agencies, which are interchangeably referred to as "SEAs" or "States" throughout this document. As in previous years, the monitoring plan will be reviewed and revised periodically to reflect lessons learned and programmatic clarification.

A. Definition and Purpose of Monitoring

Monitoring is the regular and systematic examination of a State's administration and implementation of a Federal education grant, contract, or cooperative agreement administered by ED. Monitoring the use of Federal funds has long been an essential function of ED. ED monitors programs under the general administrative authority of the U. S. Department of Education Organization Act. Section 80.40(e) of Education Department General Administrative Regulations also permits ED to make site visits as warranted by program needs.

Monitoring of the EHCY and Title I, Part D programs administered by OSHS is necessary to ensure that all children have a fair, equal, and significant opportunity to obtain a high-quality education. Monitoring assesses the extent to which States provide leadership and guidance for local educational agencies (LEAs) and schools in implementing policies and procedures that comply with the statutes and regulations of Title I, Part D and EHCY programs. Moreover, in August 2014, the Government Accountability Office recommended to ED that it improve its oversight of the EHCY program through more regular monitoring of SEAs and LEAs (available at http://www.gao.gov/products/GAO-14-465). At that time, the Office of Elementary and Secondary Education was proposing a reorganization that would move the EHCY and Title I, Part D programs to OSHS while Title I, Part A and Title III would be combined with some other programs to form an Office of State Support. After the reorganization was implemented in October 2014, planning began to resume monitoring of EHCY and Title I, Part D programs during Fiscal Year (FY) 2015 as well as long-term planning for the FY 2016, FY 2017 and beyond, which will be outlined below.

Monitoring formalizes the integral relationship between ED and the States and emphasizes, first and foremost, accountability for using resources wisely in educating and preparing our nation's students. As a result of monitoring, ED is able to gather data about State and local needs and use that data to design technical assistance (TA) initiatives and national leadership activities. Thus, monitoring serves not only as a means for helping States achieve high-quality implementation of educational programs, it also helps ED to be a better advisor and partner with States in that effort. OSHS's monitoring activities are designed to focus on the results of States' efforts to implement critical requirements of Title I, Part D of the Elementary and Secondary Education Act (ESEA) and the EHCY program of the McKinney-Vento Act using available resources and

the flexibility provisions available to States and LEAs. Data from State monitoring also informs the programs' performance indicators under the Government Performance Results Act.

ED policy requires every program office overseeing discretionary or formula grant programs to prepare a monitoring plan for each of its programs. OSHS's monitoring process includes risk-based analysis and target areas of identified need, coordinated with technical assistance.

B. Monitoring and the Strategic Plan

The Education Department's FY 2015-2018 Strategic Plan (available at http://www2.ed.gov/about/reports/strat/plan2014-18/strategic-plan.pdf) focuses on performance and outlines specific objectives, performance measures and targets in a coordinated effort to achieve measurable results for students. Regular monitoring of States' administration of Federal programs contributes to the accomplishment of the objectives and strategies outlined in the plan. It also supports the core principles of the ESEA and McKinney-Vento EHCY program as we help States leverage the law to improve academic performance for all students.

II. MONITORING INDICATORS

The content of OSHS's monitoring is based on States' responsibilities to provide guidance and support to LEAs and State agencies (SA) based on the requirements of the Elementary and Secondary Education Act (ESEA) and the McKinney-Vento Act. Monitoring States' implementation of programs administered by OSHS means closely examining State policies, systems, and procedures to ensure LEA and State agency compliance with applicable statutes and regulations.

ED uses monitoring indicators to determine the degree of implementation of Federal programs and activities administered by SEAs. Staff have developed indicators in each of the three monitoring areas (Standards, Assessment and Accountability; Instructional Support; and Fiduciary). The use of such criteria ensures a consistent application of these standards across monitoring teams and across States. The published indicators provide guidance for all States regarding the purpose and intended outcomes of monitoring by describing what is being monitored and providing the criteria for judging the quality of implementation (acceptable evidence).

The complete texts of the monitoring indicators for the Title I, Part D and EHCY programs monitored under this plan are contained in Section IV. Please note that the indicators are written broadly to cover all the requirements of each topic. Examples of documentation and evidence that States and LEAs can provide to show compliance with these requirements are listed for each indicator.

A. Monitoring Title I, Part D: Prevention and Intervention Programs for Children and Youth Who Are Neglected, Delinquent, or At-Risk (N/D)

"It is the purpose of this part to improve educational services for children and youth in local and State institutions for neglected or delinquent children and youth so that such children and youth have the opportunity to meet the same challenging State academic achievement standards and

State academic assessments that all children in the State are expected to meet." (Title I, Part D, § 1401) A growing juvenile correctional system and the educational needs of students in that system established the need for the N/D program. SEAs provide financial assistance to SA and LEAs to promote educational programs for youth in State-operated institutions or community day programs to ensure that these students are provided a high-quality education.

While some States may receive onsite visits, others will be monitored through desk reviews, which could include video or teleconferencing. Onsite visits will be based on allocation size and factors such as multiple or recurring findings.

B. Monitoring Title VII, Subtitle B of the McKinney-Vento Homeless Assistance Act of 2001 (MVHAA, Education for Homeless Children and Youths)

"Each State educational agency shall ensure that each child of a homeless individual and each homeless youth have equal access to the same free, appropriate public education, including a public preschool education, as provided to other children and youth." (Title VII, Subtitle B, § 721(1))

The EHCY program is designed to address the problems that homeless children and youth face in enrolling, attending, and succeeding in school. Homeless children and youth should have access to educational and other services that they need to meet the same State academic achievement standards and State academic assessments to which all students are held. States and LEAs are required to review and undertake steps to revise laws, regulations, practices, or policies that may act as barriers to the enrollment, attendance, or success in school of homeless children and youth.

While some States may receive onsite visits, others will be monitored through desk reviews, which could include video- or teleconferencing. On-site visits will be based on allocation size and factors such as multiple or recurring findings.

III. THE MONITORING PROCESS

Monitoring States' implementation of programs administered by OSHS provides an opportunity to examine how States have instituted policies, systems, and procedures to ensure LEA and school compliance with the statute and regulations. Monitoring serves many purposes:

- Formalizes the shared responsibility of OSHS and the States to improve student achievement and close the achievement gap in order to have all students reach proficiency.
- Leverages support for broad scale implementation in all districts that receive these funds.
- Ensures that States and school districts provide critical information to parents that enable them to be full partners in their children's education.
- Provides data that inform TA that supports States' and school districts' efforts to improve teaching and learning.
- Provides data to inform ED's policy and national leadership activities.

A. Description of the Monitoring Process

OSHS's monitoring plan involves a review process that helps SEAs build capacity to improve student achievement and ensure program compliance. During the pre-site review, OSHS staff will collect data specific to the monitoring indicators to determine compliance. As the monitoring process is a 'snapshot' of State implementation, approval of corrective actions required as a result of a monitoring activity are specific to compliance issues cited in monitoring reports and do not address emerging issues.

- Preparation for Monitoring: Prior to the monitoring visit, OSHS staff will request that the SEA submit specific documentation about eight weeks prior to scheduled onsite review. This information will assist OSHS team members by providing background and context. A thorough analysis of relevant documents is crucial to conducting an effective and efficient monitoring review. Analysis of documents helps team members identify important issues and develop questions before the visit, ensuring focused and productive onsite interviews.

- Onsite or Remote Monitoring: During the on-site visit or remote review, OSHS staff will review additional documentation and will interview SEA and LEA staff with program responsibilities. These interviews will allow the monitors to confirm or gather information and better evaluate the impact of the State's administration on the implementation of the Title I, Part D and EHCY programs. This strategy will also allow the monitoring team to conduct a thorough review of the indicators, and acquire a more complete picture of the degree of program implementation across the State.

B. Monitoring Team

A team of OSHS staff members will be assigned to conduct the on-site or remote reviews. The size of the team will vary depending on the issues identified, and due to the recent reorganization, some OSHS may observe the process.

C. Exit Conference

The exit conference is held at the conclusion of the onsite or remote review for the purpose of reporting the preliminary results of the monitoring visit to staff from the SEA. Typically, the monitoring team meets with officials from the SEA to discuss potential findings and recommendations that the team will likely cite in the monitoring report. The team will summarize the week's activities, the potential findings and recommendations, and timelines for developing the monitoring report. The team also responds to questions posed by the SEA (both related to process and content). The team leader emphasizes that the information presented at the exit conference is preliminary, and explains that during the development of the monitoring report, the team will continue to review data and contact the SEA for additional information, as required.

Monitoring Indicators for Title I, Part D Program
Standards, Assessment, and Accountability

1.1: The SEA conducts monitoring and evaluation of its subgrantees sufficient to ensure compliance with Title I, Part D program requirements and progress toward Federal and State program goals and objectives. [§§1426 and1431]

Guiding Questions	Acceptable SEA Evidence	Acceptable SA/LEA Evidence
Questions:	Documentation:	Documentation:
▪ How does the SEA ensure that students in Title I, Part D programs receive instruction that is aligned with state standards and accountability?	▪ Written material describing statewide program performance for the last school year: reports, report cards, handouts, PowerPoint slides, agendas and notes, etc.	▪ The most recent annual data report for the SA or LEA subgrantee.
▪ What is the SEA process for monitoring Subpart 1 and 2 programs from selection and notification to reporting and corrective action follow-up?	▪ Evidence SEA provided technical assistance to subgrantees on how to efficiently and effectively collect and use data, including training or conference agendas, presentation materials, activity descriptions, evaluations.	▪ Any longitudinal tracking of annual outcome data for the SA or LEA subgrantee.
▪ What is the process for data collection that the SEA uses to obtain demographic, academic and vocational outcome information on all Subpart 1 and 2 programs?	▪ A subgrantee monitoring schedule for the current Fiscal Year (FY).	▪ The most recent agency or program-specific evaluation reports that include mention of the Title I, Part D program.
▪ How does the SEA evaluate statewide and subgrantee program performance and report the results of such evaluations?	▪ A plan for monitoring all subgrantees through desk review and site visits.	▪ Documents submitted to the SEA to address corrective actions required by the SEA.
	▪ Monitoring interview protocols for Subpart 1 and 2.	
	▪ Application review checklists or notes.	
	▪ The most recent monitoring reports for subgrantees.	
	▪ SEA documents tracking subgrantee responses to corrective actions.	

Monitoring Indicators for Title I, Part D Program
Instructional Support

2.1: The SEA ensures that SA programs for eligible students meet all requirements, including facilities that operate institutionwide projects. [§1412(A); §1414(a) and (c), 1416]		
Guiding Questions	**Acceptable SEA Evidence**	**Acceptable SA/LEA Evidence**
Questions: ▪ What are the SEA's goals and objectives for the Title 1, Part D Program? Have they been reviewed and updated recently? ▪ How does the SEA inform SAs about their eligibility and application requirements for a Title I, Part D subgrant? ▪ What technical assistance does the SEA provide the SAs on developing or revising their Subpart 1 applications? ▪ How does the SEA review and evaluate the Subpart 1 applications? ▪ Do institutionwide project plans include a comprehensive needs assessment across all education program services? ▪ How are the needs assessment, curriculum, plans for professional development and program evaluation aligned in institutionwide projects?	Documentation: ▪ Updated State plan tracking performance of SEA goals and objectives. ▪ Documents concerning eligibility of SA facilities for Title I, Part D funds or institutionwide projects, including checking the Child Count, minimum hours of a regular program of instruction, age of students and average length of stay in institutions. ▪ Written SEA guidance to SAs on developing or revising Subpart 1 applications, including institutionwide projects for specific facilities or programs, such as written instructions, agenda, notes or minutes and handouts from meetings with prospective applicants. ▪ Checklists, notes or other written evidence that the SEA has a review process for awarding subgrants to SA and approving institutionwide project plans. ▪ A list of subgrant awards to all SA and facilities served by Subpart 1 funds.	Documentation: ▪ State agency applications and supporting documents addressing the 19 application elements, including assurances and descriptions, from the current or past FY, including the length of the school day, weekly hours of a regular program of instruction, and parental involvement activities. ▪ Documents related to the 8 institutionwide project application requirements for each facility conducting an institutionwide project, such as comprehensive needs assessment or program evaluation reports. ▪ Documents from professional development meetings and program evaluation meetings for institutionwide projects such as reports, agenda, notes or handouts.

2.2: The SEA ensures that LEA programs for eligible students meet all requirements. [§1423 and §1425]		
Guiding Questions	**Acceptable SEA Evidence**	**Acceptable LEA Evidence**
Questions: SEA Questions: ▪ How do you inform LEA's about the application requirements for a Title I, Part D subgrant? ▪ What criteria does the SEA use to determine Subpart 2 programs with "high numbers"? ▪ What technical assistance does SEA provide to LEAs and eligible institutions operating Title I, Part D, programs, including developing or revising its Subpart 2 application? ▪ How does the SEA review and evaluate the Subpart 2 applications? LEA Questions: ▪ How does the LEA consult with each N or D facility in the program planning and evaluation process? ▪ Are formal agreements between the LEA and these facilities reviewed and updated annually?	Documentation: ▪ Written guidance to LEAs on developing or revising Subpart 2 applications such as written instructions, agenda, notes or minutes and handouts from meetings with prospective applicants. ▪ Checklists, notes, or other written evidence of the SEA review process for subgrants to LEAs that ensures that all funded facilities meet program goals and provide qualified instructional staff. ▪ Written information used by the SEA to identify eligible institutions, such as State agency licensing lists, and notifications to LEAs of their eligibility to submit child counts and apply for funds. ▪ A list of all LEA subgrant awards and N or D facilities served by these subgrants.	Documentation: ▪ LEA applications and supporting documents that address the 13 application elements, including assurances and descriptions, from the current or past FY. ▪ Formal agreements between LEAs and neglected or delinquent facilities and programs outlining responsibilities for providing services mentioned in the 13 application elements. ▪ Qualifications of Title I, Part D staff when a facility is privately managed and served by the LEA.

3.1 The SEA ensures each State agency complies with the statutory and other regulatory requirements governing State administrative activities, providing fiscal oversight of the grants including reallocations and carryover, ensuring subgrantees reserve funds for transition services, demonstrating fiscal maintenance of effort and requirements to supplement, not supplant. [§1004, §1414 (c)(7), §1415(b) and §1418] [Also OMB Circular A-87, Part 80, Subpart C of EDGAR, and any other relevant standards, circulars, or legislative mandates]

Guiding Questions	Acceptable SEA Evidence	Acceptable SA Evidence
- How much of the Subpart 1 allocation does the SEA reserve for State administration activities and for what activities? - When do SA receive their Title I, Part D subgrants? If there was a delay of more than three months, why was that? - How does the SEA ensure that 15% - 30% of funds are reserved and used for transition activities? - What is the SEA's policy regarding carryover and reallocation of funds? - What internal fiscal controls does the SEA have in place to account for the use of Title I, Part D funds in a way that meets Federal requirements? - What other technical assistance does the SEA provide to the SAs on uses of funds? For the State agency: - For what transition-related activities are reserved funds used by the SA? - How does the SA demonstrate fiscal maintenance of effort? - How is the Title I, Part D program supplemental to the regular instructional program? - What internal fiscal controls does the SA have in place to account for uses of funds in a way that meets Federal requirements?	Documentation: - SEA budget detail on reserved funds for State administrative activities for the current FY and use of funds for the last FY. - Written guidance sent to SAs outlining requirements for reserving funds for transition services under Subpart 1. - Requirements on the State agency application to calculate the percentage and provide budget detail on transition services. - Evidence that the SEA reviews fiscal maintenance of effort for SA and any follow-up action when an SA fails to maintain effort. - Any other fiscal reporting or oversight of Subpart 1 subgrantees, for example, quarterly reports, budget amendment requests and approvals, etc.	Documentation: - Evidence that the SA reserves the appropriate amount of funds as required for transition services. - Documentation of expenditures from the transition reservation for the current and prior FYs and/or documentation concerning the transition services provided at each of the funded facilities or programs. - Evidence that the SA is implementing planned and approved activities, for example, budget reports at the end of a FY, records of expenditures, carryover and other summary reports. - A current list of all personnel (instructional and administrative staff) paid with Title I, Part D funds and the proportion of their salaries, benefits and duties that are funded by Title I, Part D.

3.2 The SEA ensures each LEA complies with the statutory and other regulatory requirements governing State administrative activities, providing fiscal oversight of the grants including reallocations and carryover, and allowable uses of funds. [§1424] [Also OMB Circulars A-87, Part 80, Subpart C of EDGAR and any other relevant standards, circulars, or legislative mandates]

Guiding Questions	Acceptable SEA Evidence	Acceptable LEA Evidence
▪ How do the SEA and LEA ensure that the Title I, Part D program activities are within the uses of funds and purposes of the Title I, Part D program? What other technical assistance does the SEA provide to the LEAs on uses of funds? ▪ When do LEAs receive their Title I, Part D subgrants? If there was a delay of more than three months, why was that? ▪ What is the SEA's policy regarding carryover and reallocation of funds? ▪ What kind of internal fiscal controls do SEAs and LEAs have in place to ensure that they can account for the use of Title I, Part D funds in a way that meets Federal requirements? For the LEA: ▪ What consultations does the LEA have with each N or D facility or program that will be served with Subpart 2 funds?	Documentation: ▪ SEA budget detail on reserved funds for State level activities for the current FY and use of funds for the last FY ▪ Any other fiscal reporting or oversight of Subpart 2 subgrantees, for example, quarterly reports, budget amendment requests and approvals, etc.	Documentation: ▪ Formal agreements between an LEA, an N or D facility or alternative school program governing the use of Subpart 2 funds when they are subcontracted to a facility or program. ▪ Evidence that the LEA or facility is implementing planned and approved activities, including budget reports, records of expenditures, carryover and other summary reports. ▪ A current list of all personnel (instructional and administrative staff) paid with Title I, Part D funds.

Monitoring Indicators for McKinney-Vento Homeless Education Program
Standards, Assessment, and Accountability

1.1: The SEA conducts monitoring and evaluation of LEAs with and without subgrants, sufficient to ensure compliance with McKinney-Vento program requirements. [§722(g)(2)(A) and (B)]		
Guiding Questions	**Acceptable SEA Evidence**	**Acceptable LEA Evidence**

▪ How does the SEA inform LEAs with and without subgrants about data collection responsibilities, and ensure complete, accurate and timely reports?
 	
▪ How does the LEA collect local data and transmit information requested on homeless students to the SEA?
 	
▪ How do the SEA & LEAs ensure that homeless students are included in statewide assessments?
 	
▪ What emphasis do SEA and LEA place on student academic outcomes as part of the subgrant application?
 	
▪ Does the SEA provide technical assistance and require LEAs with subgrants to conduct a program evaluation to determine the effectiveness of the program?
 	
▪ What information has the LEA received from the SEA about its monitoring requirements for the McKinney-Vento program?
	Documentation:
	
	▪ Written guidance for data collection requirements for LEAs and how the SEA reviews the data.
	
	▪ Written procedure for monitoring LEAs with and without subgrants to include:
	
	  o Recent copy of monitoring policies and procedures, schedules for current and previous school years.
	
	  o Sample notification letters to LEAs, preparation checklists, or other forms.
	
	  o A copy of the interview protocol for LEA reviews.
	
	  o Most recent copies of reports, recommendations and follow-up to corrective actions.
		Documentation:
		
		▪ The most recent copy of evaluation reports of McKinney-Vento services or subgrant project.
		
		▪ Written documentation or summaries of homeless students' primary nighttime residence.
		
		▪ Most recent reports of statewide assessment performance of homeless students enrolled in the district for the last fiscal or school year.

Monitoring Indicators for McKinney-Vento Homeless Education Program
Instructional Support

Guiding Questions	Acceptable SEA Evidence
2.1: The SEA implements procedures to address the identification, enrollment and retention of homeless students through coordinating and collaborating with other program offices and SA. [Title X, §722 (f) and (g)]	
- How and from what sources does the State collect information to determine the ongoing needs of homeless students in the State? - Since the State submitted its 2002 application, has it reviewed, revised, and developed policies, or issued policy briefs or memoranda to ensure removal of barriers for homeless students? - How does the State coordinator collaborate with other State agency staff to address the needs of homeless children and youth? - How do the SEA and State coordinator ensure coordination among SEA programs serving students experiencing homelessness including Title I, Part A, special education, early learning services, and at-risk youth programs? - How does the State coordinator participate in Statewide activities that address the needs of homeless pre-school children and unaccompanied youth?	Documentation: - Written communication to LEAs updating SEA policies and procedures that address the problems homeless children and youth face in school enrollment and retention since the last ED program review. - Updates to the State Plan, including the completion of planned activities and proposals for new State-level activities. - Data and summary reports from other program offices in the SEA and other SA concerning the educational needs of homeless children and youth in the State. - Evidence that the SEA coordinates programs and services between the SEA, the State social services agency, and other agencies (including agencies providing mental health services), for example schedules, agendas, minutes, notes or handouts from attending such meetings. - Evidence that the SEA ensures that eligible homeless students receive Title I, Part A services through its written guidance to LEAs, sections of the consolidated application and schoolwide program plans addressing the educational needs of homeless students, and description of the activities funded through the LEA reservation for comparable services for homeless students in non-Title I schools.

2.2: The SEA provides, or provides for, technical assistance to LEAs to ensure appropriate implementation of the statute. [§722(e) and (g)(3)(a)]		
Guiding Questions	**Acceptable SEA Evidence**	**Acceptable LEA Evidence**
▪ What ongoing professional development activities does the State Coordinator provide to LEAs with and without subgrants about the requirements of McKinney-Vento? ▪ How often does the SEA monitor changes in staffing of LEA liaisons? How does the SEA assist new liaisons with learning their responsibilities for implementing McKinney-Vento? ▪ What special activities are undertaken on behalf of homeless preschool children and homeless unaccompanied or out of school youth? ▪ How do the SEA and LEAs ensure enrollment in the school of origin, if feasible and in the best interest of the child, and transportation, when requested? ▪ What is the technical assistance that the State provides to LEAs to ensure that community agencies that serve homeless individuals are made aware of the rights of homeless students? ▪ How do the SEA and LEA ensure that homeless students are enrolled and assisted with basic school requirements (e.g., records transfer, health and immunization records, and residency)?	Documentation: ▪ Copies of written guidance to LEAs and/or information dissemination materials distributed electronically or by other means. ▪ The most recent liaison orientation, on-line trainings, conferences, and regional training agendas and technical assistant log. ▪ The most recent professional development schedule and agenda, handouts or other sample materials unique to the State. ▪ Documents related to activities associated with homeless preschool children, unaccompanied and out of school youth.	Documentation: ▪ Evidence that the LEA annually reviews and revises policies and practices to ensure they do not act as barriers to enrolling homeless students, such as agenda, minutes or notes from meeting where these reviews occur. ▪ Evidence that the LEA designates and allows for training of a liaison for homeless children and youth and this person provides training to other relevant district personnel. ▪ Examples of written notification to parents and youth regarding placement decisions when they are different from what was requested. ▪ Evidence that the LEA ensures that transportation to the school of origin is provided upon request and monitored by the LEA. ▪ Evidence that the LEA liaison or district staff conduct outreach to relevant community groups to inform them of McKinney-Vento rights and services for homeless children and youth, such as copies of agenda, minutes, handouts or notes.

Monitoring Indicators for McKinney-Vento Homeless Education Program
Fiduciary

3.1 The SEA ensures that LEA subgrant plans for services to eligible homeless students meet all requirements. [§722(e)(1) and §723]		
Guiding Questions	**Acceptable SEA Evidence**	**Acceptable LEA Evidence**
Questions: ▪ What are the steps the State takes to organize a subgrant competition? How are reviewers chosen and trained? ▪ How does the SEA review grants for quality of application as well as local need? ▪ How does the SEA ensure subgrant funds are awarded in a timely manner and available throughout the grant period? If there was a delay of more than three months, why was that? ▪ What is the SEA's policy regarding carryover and reallocation of funds? ▪ What internal fiscal controls do SEAs and LEAs have in place account for the use of subgrant funds in a way that meets Federal requirements?	Documentation: ▪ Evidence the SEA has an application and approval process to provide competitive subgrants to LEAs. ▪ Evidence that LEA subgrant applications are reviewed and awarded on a competitive basis for both need <u>and</u> quality of the project proposal. ▪ If the SEA awards any of its State-level coordination activity funds to LEAs for pilot projects, detail of those expenditures for the current FY and any use of funds for the last FY. ▪ Any other fiscal reporting or oversight of EHCY, for example, quarterly reports, budget amendment requests and approvals, etc.	Documentation: ▪ Evidence the LEA application/ plan includes assessment of the needs of homeless students and the supplemental services provided. ▪ Evidence that the subgrant expands or improves services provided as part of regular academic program. ▪ Written contracts when an LEA subcontracts any of its EHCY activities to a third-party organization. ▪ Evidence that the LEA is implementing required and authorized activities, for example, budget reports at the end of a FY, records of expenditures, carryover and other summary reports. ▪ A current list of all personnel (instructional and administrative staff) paid with McKinney-Vento subgrant funds.

3.2: The SEA complies with the statutory and other regulatory requirements governing the reservation of funds for State-level coordination activities. [§722 (c) – (g)] [Also OMB Circular A-87 and any other relevant standards, circulars, or legislative mandates]	

Guiding Questions	Acceptable SEA Evidence
▪ How much of the McKinney-Vento EHCY allocation does the SEA reserve for State-level coordination activities and what are those activities? ▪ What is the SEA's policy regarding carryover of these funds? ▪ What internal fiscal controls does the SEA have in place to ensure that it can account for the use of McKinney-Vento funds for State-level activities in a way that meets Federal requirements? ▪ What Statewide needs assessment and program evaluation is funded through State-level activities or conducted by the State coordinator?	Documentation: ▪ SEA budget detail on reserved funds for State-level coordination activities for the current FY and use of funds for the last FY. ▪ Any other fiscal documents such as contracts, invoices, etc. ▪ Needs assessment or evaluation reports for State-level coordination activities.

3.3: The SEA has a system for ensuring the prompt resolution of disputes. [§722(g)(C)]

Guiding Questions	Acceptable SEA Evidence	Acceptable LEA Evidence
Questions:	Documentation:	Documentation:

▪ How does the State Coordinator ensure that liaisons are aware of the State's dispute resolution policy and that the LEA has adopted or adapted the policy?
 	
▪ What is the State's process to review or investigate disputes brought by parents/youths?
 	
▪ Do all districts have a written district dispute resolution process and track pre-dispute inquiries concerning barriers to enrollment?
 	
▪ Do the SEA and LEAs conduct independent surveys of community groups determine if parents/youth are receiving their rights regarding school enrollment and enrollment disputes?
	▪ Updated SEA dispute resolution policy and procedures including:
	
	  o procedures for tracking disputes
	
	  o documents indicating that dispute procedures have been implemented
	
	  o records indicating that disputes are addressed, investigated and resolved in a timely manner
	
	▪ Evidence that SEA tracks if LEAs have a dispute resolution policy in place.
	
	▪ Survey results or records of inquiries and complaints made by community groups concerning barriers to enrollment for students experiencing homelessness.
		▪ Written dispute resolution policy.
		
		▪ Evidence that LEA implements a process for the prompt resolution of disputes, such as a phone log, notes, or e-mail messages.
		
		▪
		
		▪ Records indicating that enrollment disputes are investigated and resolved in a timely manner.
		
		▪ Evidence that students are enrolled and provided transportation during the dispute resolution process.
		
		▪ Survey results or records of inquiries and complaints made by community groups concerning barriers to enrollment for students experiencing homelessness.