

NCDPI Education for Homeless Children and Youth Program  
Local Education Agency Monitoring Protocol  
March 2019

Monitoring local educational agency (LEA) Education for Homeless Children and Youth (EHCY) programs for compliance is a requirement under the McKinney-Vento Act [42 U.S.C. § 11432(f)(5)]. This provision applies to LEAs both with and without subgrants. While the monitoring process for LEAs and charter schools with McKinney-Vento subgrants may include additional elements to evaluate the effectiveness of funded programs, the State educational agency (SEA) monitoring protocol for LEAs for compliance with the McKinney-Vento Act is comparable for LEAs with and without subgrants since all LEAs have the same responsibility to identify, enroll, and support students experiencing homelessness.

### **Monitoring Process**

The U. S. Department of Education (ED) suggests that all LEAs should be monitored on a regular basis by the office of the coordinator for the state EHCY program. The monitoring, also known as Program Quality Reviews (PQRs) in NC, is conducted in the following ways:

1. **On-site:**  
On-site monitoring includes a face to face meeting with the homeless liaison in the LEA/charter school to gain first-hand knowledge of the districts program and to learn about unique characteristics and challenges. The State EHCY office conducts an interview with the homeless liaison as well as review specific evidence of the district's homeless education program. Site visits to schools and community agencies, and interviews with other staff working with the homeless program may be included in the on-site visit.
2. **Desk Review:**  
A desk review entails the homeless liaison submitting to the State EHCY office documents that are specific to the local EHCY program's identification and serving of homeless children and youth. The desk review can be combined with other forms of monitoring in the LEA. Documents reviewed can include the enrollment questionnaire, school board policies, program needs assessments, technical assistance and training logs, district's data on homeless students, subgrant reports, district resources including the LEA/charter website, Title I set-aside amounts and collaboration activities with the Title I program, and attendance at compliance forums or other trainings required by the State Coordinator.
3. **On-line Portal:**  
The on-line monitoring tool allows a homeless liaison to answer questions through an on-line portal system, including the upload of evidence the liaison determines as best practices, strategies, and evidence in the identification of homeless students. This is a self-paced process for monitoring in which the State Coordinator will provide feedback to the homeless liaison to ensure compliance.
4. **Other:**  
Other options for monitoring may include the local EHCY program being monitored remotely through Skype, a Go-to Meeting or other online platform. Another option for monitoring, includes LEAs/charter schools in a region at the same time being monitored together. Technical assistance is often provided throughout the interview process with specific areas of concern and best practices identified by the group. This process is one in which the State Coordinator requires a homeless liaison to participate or a homeless liaison can request.

### **Selection of LEAs for Monitoring**

Mirroring the approach for selecting States for Federal EHCY monitoring, the State EHCY office conducts an annual risk-assessment of LEA EHCY programs. With the availability of LEA-level data workbooks that are provided by the National Center for Homeless Education (NCHE), the State EHCY office prioritizes LEAs and charter schools to monitor according to those who are at the greatest risk of non-compliance with the McKinney-Vento Act. Risk factors may include:

- amount of time since the LEA was last monitored;
- number of findings in the previous monitoring;
- indications that the LEA may be under-identifying homeless students;
- number of complaints related to serving homeless children and youth received at the State level;
- quality of data submitted to the SEA and ED*Facts*;
- amount of turnover in the homeless liaison position and liaison participation in professional development offerings; and
- for subgrantees, submission of required records, end-of-year reports, and evidence of appropriate use of funds, including timely expenditures.

### **Monitoring Protocol**

The monitoring instrument is reviewed and updated annually to address new priorities coming from the State Superintendent's office and ED. The monitoring instrument for NC is located at [https://hepnc.uncg.edu/wp-content/uploads/Docs/Sample-Monitoring-Instrument\\_3.2019.docx](https://hepnc.uncg.edu/wp-content/uploads/Docs/Sample-Monitoring-Instrument_3.2019.docx).

### **Arranging, Conducting, Follow-up of Monitoring**

The 2016 federal *Non-regulatory Guidance* for the EHCY program states, "The monitoring process should include a formal letter of notification; protocols for interviews, observations, and document review, as applicable; a written report of whether requirements were met, or corrective actions required; and a process for resolving corrective actions." (ED, 2016, p. 14).

In arranging the LEA monitoring schedule for the year, the State EHCY office will send a letter to each homeless liaison and superintendent in LEAs / charters that are selected for monitoring notifying them that the LEA / charter will be undergoing a monitoring review and that the office will contact the homeless liaison to schedule a time for the review. The correspondence will include who will conduct the monitoring, the type of monitoring, what logistical tasks the liaison should undertake to prepare, and what records will be needed before and during the interview. Information on time, date, and who should attend the monitoring will be included as well as the monitoring protocol and rating rubric.

The State EHCY office may request that the homeless liaison arrange meetings with other administrators and role groups (e.g., Title I coordinator, pupil transportation director, school social worker, data manager, enrollment staff and/or community service providers). On-site monitoring of LEAs will include visits to a few schools. After the review, the State EHCY office will provide a report of findings, commendations, and recommendations, with instructions for how the LEA should respond to any findings and the deadline for the response.

### **For additional questions and support contact:**

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Federal Program Monitoring and Support Division  
The SERVE Center at UNCG  
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Website: [www.serve.org/hepnc](http://www.serve.org/hepnc) or <http://www.ncpublicschools.org/program-monitoring/homeless/>

**Resources:**

NCHE. (2016). *Local Educational Agency Informal Needs Assessment*. Retrieved at <https://nche.ed.gov/needs-assessment/>

NCHE's Resources by Topic web page on Monitoring and Program Evaluation at <https://nche.ed.gov/monitoring-and-evaluation/>

Title VII-B of the McKinney-Vento Homeless Assistance Act as amended by the Every Student Succeeds Act, 42 U.S.C. § 11431 *et seq.*, 2015. Retrieved December 2016 <http://uscode.house.gov>

U.S. Department of Education. (2016). *Education for Homeless Children and Youth Program Non-Regulatory Guidance*. Retrieved July 2016 <http://www2.ed.gov/policy/elsec/leg/essa/160240ehcyguidance072716.pdf>