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F. Title V, Part B, Subpart 2: Rural and Low-Income School Program.

- i. Provide the SEA's specific measurable program objectives and outcomes related to activities under the Rural and Low-Income School Program, if applicable.

Objectives and outcomes related to Title V, Part B, Subpart 2: Rural and Low-Income School Program (RLIS), Section 5221 shall be aligned with PDE's measurable long-term goals as stated in Section 1.

LEAs may use Title V, Part B funds to provide students, staff, and families assistance in obtaining measurable goals and objectives which shall align with Pennsylvania's long-term measurable goals. PDE shall prioritize the allowable use of funds as described in the RLIS application. Grant funds awarded to LEAs under this subpart can be used for several activities, including those authorized under Title I, Part A; Title II, Part A; Title III; Title IV, Part A; and parent/family engagement activities.

PDE's aim is to increase the number of LEAs that exercise flexibility under Title V, Part B with the allowable use of funds. PDE shall continue to provide comprehensive technical support to LEAs which may promote LEAs' flexibility within the allowable use of funds. The consolidated LEA plan will be updated to include an opportunity for grantees to align RLIS goals and objectives with Title I, Part A; Title II, Part A; Title III, Part A; and Title IV, Part A. Examples of technical assistance include, but are not limited to: an annual webinar for RLIS grant recipients, support with submitting the grant application, and updates on RLIS grants at the annual conference of PDE's Division of Federal Programs and various workshops held throughout each program year. Additionally, Division of Federal Program staff responsible for the RLIS grant communicate frequently with grantees via email to provide customized technical assistance and to relay general updates and requirement information to all recipients of the RLIS grant.

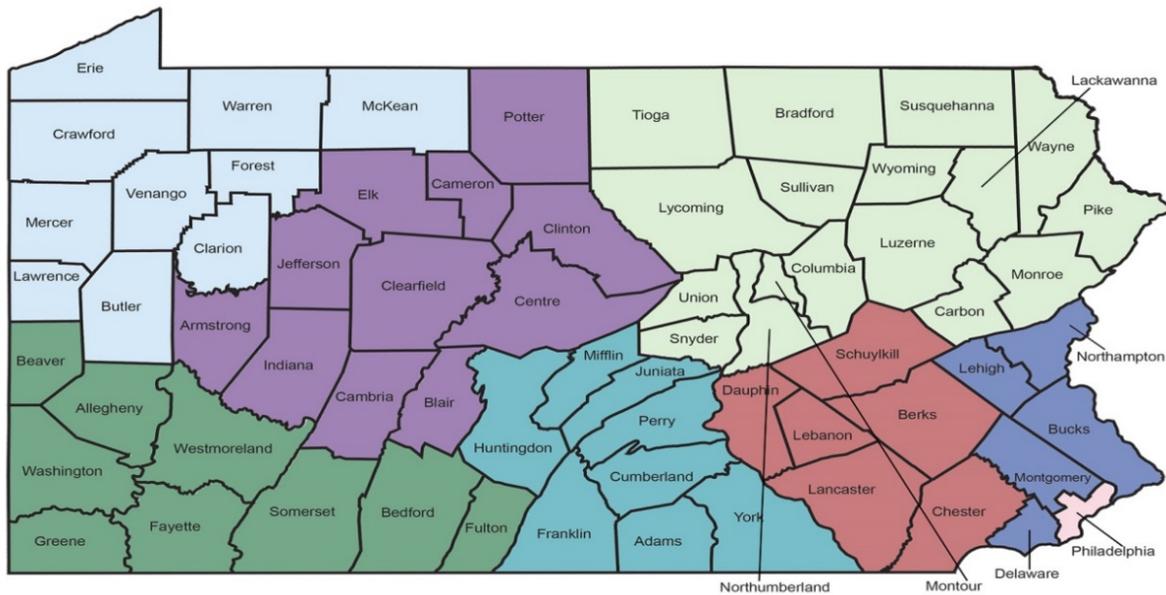
G. McKinney-Vento Act.

- ii. Consistent with section 722(g)(1)(B) of the McKinney-Vento Act, describe the procedures the SEA will use to identify homeless children and youths in the State and assess their needs.

The Pennsylvania Education for Children and Youth Experiencing Homelessness (ECYEH) Program is structured to ensure that every student identified as experiencing homelessness has an opportunity to receive the support and services they need to succeed in the classroom and beyond. Pennsylvania is divided into eight regions, each with a regional coordinator.

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Figure 6.24. Pennsylvania ECEH Regions



Eight regional coordinators and their site coordinators provide outreach, training, and technical assistance to LEAs and work to link children, youth, families, and LEAs to additional services or resources for individuals experiencing homelessness. ECEH program regional and site coordinators:

- Help increase program awareness among various stakeholder groups, as well as to members of the public;
- Facilitate accurate and prompt identification of students experiencing homelessness; and
- Ensure compliance with all McKinney-Vento Act requirements.

Regional staff provide ongoing training to LEAs and community agencies to ensure that appropriate personnel are properly trained on methods and strategies to identify children and youth experiencing homelessness. Regional staff will hold at least two meetings in each county in each school year to review proper identification procedures. In addition, regions will share tools and best practices to be used in school districts to address the identification of homeless students. These tools include sample residency questionnaires, intake forms, and other materials. Posters (printed in English and Spanish) are also posted in commonly-frequented areas, such as laundromats, food pantries, and clothing donation centers.

Outreach procedures will include the following:

- Communication and contact with regional shelters and bridge housing programs to learn of children requiring assistance;
- Participation in homeless shelter activities and programming, including outreach to those experiencing homelessness within the local community (for example, shelter visits, outreach to food pantries/banks, etc.); and
- Strengthening community partnerships with regional Head Start agencies to identify and assist children experiencing homelessness.

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With assistance from an external technical assistance agency, regions will also host regional trainings for personnel from LEAs and social service agencies. The regions will also utilize technology to offer creative solutions to LEAs and social service agencies that are not able to participate in on-site activities.

In addition, emphasis will be placed on training LEA liaisons to assist unaccompanied youth with securing independent student status on the Free Application for Federal Student Aid (FAFSA), as well as applying for relevant need- and merit-based scholarships for postsecondary training and education.

Regions will assess the needs of their students by having students or families complete intake forms, conducting in-person interviews, ascertaining if the student has special needs, and making home visits to the student's/family's current residence.

iii. Describe the SEA's programs for school personnel (including liaisons designated under section 722(g)(1)(J)(ii) of the McKinney-Vento Act, principals and other school leaders, attendance officers, teachers, enrollment personnel, and specialized instructional support personnel) to heighten the awareness of such school personnel of the specific needs of homeless children and youths, including such children and youths who are runaway and homeless youths.

The Office of the State Coordinator, housed at PDE, will continue to administer ongoing educational trainings to school personnel, increasing the number and scope of trainings as necessary. Regions will provide at least two meetings in each county throughout the school year to educate liaisons on the rights and services for homeless youth, including runaway and unaccompanied homeless youth. These trainings include generalized education (cornerstones of McKinney-Vento, school staff reporting responsibility, any changes or adaptations to the program per legislation, etc.), as well as more specialized trainings geared towards specific school staff populations, such as school nurses, guidance counselors, etc. The regional office provides regional trainings to all LEAs to heighten awareness and continue to improve identification of and assistance for children and youth experiencing homelessness, including runaway and unaccompanied homeless youth.

During these trainings, the regional office ensures LEAs have adequate resources and materials (informational posters, brochures, and technical assistance contact information) to be successful in providing appropriate services and supports to students experiencing homelessness, including runaway and unaccompanied homeless youth. Throughout the trainings, the regional office will provide technical assistance to LEAs to ensure that updated policies and procedures are designed and implemented.

PDE will meet with new LEA liaisons to help implement appropriate reporting and identifying procedures. Schools are provided with updates and changes to federal law on an ongoing basis; regional staff is readily available for consult and assistance and maintains close communication with school district staff. PDE also provides on-site trainings as requested, including attending annual all-staff in-services, job-alike trainings, and orientation for new liaisons. Schools reporting "zero" students are targeted for additional trainings and services.¹⁴³

¹⁴³ Schools may overlook students who are doubled up (living in residential housing with a friend or family member) or may not identify signs in the changes to student's attendance or behavior as being indicators of homelessness.

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PDE also published a revised Basic Education Circular (BEC) in December 2016 that reflected the updated requirements under McKinney-Vento, as amended by ESSA. A copy of the BEC is available on PDE’s website.¹⁴⁴

iv. Describe the SEA’s procedures to ensure that disputes regarding the educational placement of homeless children and youths are promptly resolved.

ECYEH has developed the following procedures to govern the resolution of disputes regarding enrollment, school selection, homeless status and complaints of non-compliance with legal requirements pertaining to the education for homeless children and youths:

| Level | Procedure |
|---|---|
| Level 1 – A dispute may be raised with a LEA. ¹⁴⁵ | If a dispute arises over school selection or enrollment, the child or youth involved must immediately be admitted to the school in which they are seeking enrollment, pending resolution of the dispute 42 U.S.C.§11432(g)(3)(E)(i). ECYEH recommends that the parent, guardian, or unaccompanied youth who initiates the dispute contact the LEA liaison for individuals experiencing homelessness as soon as possible after receiving notice of the dispute. If the person initiating the dispute does not contact the LEA liaison directly, the LEA shall be responsible for contacting the LEA liaison regarding the dispute as soon as possible and referring the family or youth involved to the liaison. The LEA liaison shall ensure that the child or youth is immediately enrolled, explain the dispute resolution process to families and help them to use it 42 U.S.C. §11432(g)(3)(E)(iii). The LEA shall issue a written disposition of the dispute within 20 business days after the LEA liaison is notified of the dispute. The disposition shall be provided to the parent, guardian or unaccompanied youth and shall explain the basis for the decision and advise the parent, guardian or youth of the right to appeal. 42 U.S.C.§11432(g)(3)(E)(i). |

¹⁴⁴ [PDE website](#)

¹⁴⁵ The LEA should use and maintain copies of PDE’s “Notice of Procedural Safeguards” form (see attached) which ensures that all LEAs (a) inform families of the basis of their decision regarding enrollment or school selection; (b) notifies families of their right to remain in their school of choice pending resolution of the dispute and (c) explains the procedures for challenging the decision of the LEA.

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| Level | Procedure |
|--|---|
| <p>Level 2 – A complaint may be filed with a McKinney-Vento coordinator. ¹⁴⁶</p> | <p>If the parent, guardian, or unaccompanied youth is dissatisfied with the LEA’s disposition of a dispute or would like to raise any issue of McKinney-Vento Act noncompliance, they may file a complaint or appeal with a McKinney-Vento site or regional coordinator or with the state coordinator. In lieu of filing an appeal with a McKinney-Vento coordinator, a parent, guardian, or unaccompanied youth may elect to appeal the LEA decision directly to a court of competent jurisdiction. Participation in the appeal procedure is not required prior to taking legal action.</p> <p>A regional or site coordinator with whom a complaint or appeal is filed must notify the state coordinator immediately. Upon being notified, the state coordinator will review the complaint or appeal and assign it to a site or regional coordinator for disposition. The coordinator to whom the appeal is assigned may contact, interview and accept documentation from any individual or LEA involved, and shall issue a written disposition within 20 business days after the complaint or appeal has been assigned. The disposition shall be provided to the LEA and the parent, guardian or unaccompanied youth involved. The child or youth shall continue to be enrolled in the school in which he or she is seeking enrollment until the complaint or appeal is resolved or until a disposition from a McKinney-Vento coordinator is received.</p> <p>The state coordinator may assist in the mediation of disputes directly and may also invite those involved to have the dispute mediated at any time in the process through the Dispute Resolution Program operated by the Commonwealth Office of General Counsel (OGC). The OGC Dispute Resolution Program is a voluntary informal process through which a trained mediator assists in reaching a mutually acceptable resolution. Participating in mediation is not a waiver of the right to file a lawsuit nor is participation in mediation required prior to taking legal action.</p> |

The regional office follows a regimented procedure to resolve disputes regarding the educational placement of children and youth experiencing homelessness. All relevant information is gathered from the family and the school district, as well as any other relevant personnel (agency staff, etc.). This information is reviewed thoroughly, assessing McKinney-Vento eligibility, the stability and well-being of

¹⁴⁶ The parent, guardian, or unaccompanied youth may file a complaint with the McKinney-Vento site, regional or state coordinator on the ECYEH complaint form. However, the use of the attached form is not mandatory. Any dispute raised by a homeless family or youth concerning school enrollment or any other right under the McKinney-Vento Act whether received via telephone, letter, or any mode of communication shall be treated as a complaint.

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the child, and any other relevant issues. More than 30,000 students are served yearly in Pennsylvania's Education of Children and Youth Experiencing Homeless (ECYEH) program.

Taking these factors into account, the regional office makes a recommendation and promptly communicates the information to PDE. The Department has an explicit duty to respond to dispute inquiries. Districts have the right to deny enrollment but must follow appropriate dispute resolution procedures, including provision of a form/letter indicating the date by which the parent/student must respond. If the case enters the formal dispute phase, it is transferred to the state coordinator for resolution. The regional coordinator will send all information gathered during the investigative process to the state coordinator, who will make a final determination within 20 days of receipt of the dispute. If the disputing party disagrees with the decision determined by the state coordinator, they may seek additional resolution to their dispute in the courts. LEA staff will ensure the child can attend school and access resources during the dispute process, pending final resolution of the dispute and all appeals.

- v. Describe the SEA's procedures to ensure that that youths described in section 725(2) of the McKinney-Vento Act and youths separated from the public schools are identified and accorded equal access to appropriate secondary education and support services, including by identifying and removing barriers that prevent youths described in this paragraph from receiving appropriate credit for full or partial coursework satisfactorily completed while attending a prior school, in accordance with State, local, and school policies.

Youth Separated from Public School. To ensure that homeless youth who are separated from public schools are identified and accorded equal access, without barriers to full or partial credit, outreach by LEA homeless education liaisons is a critical element in training at the local, regional, and state levels. Outreach procedures are included in the monitoring of LEA McKinney-Vento programs, and access to afterschool and out-of-school programs, summer school, and tutoring has been developed for credit recovery for students separated from public school.

Removing Barriers to Credit for Coursework. Regional and local liaisons will assist homeless youth in acquiring records from their previous school as necessary. Regional offices will work diligently to reconnect students with their school of origin, when possible, which greatly reduces the possibility of losing credits for coursework. Regional offices will focus efforts on training local liaisons and providing adequate resources and support to aid in the removal of these barriers, ensuring that liaisons are aware of all aspects of these duties. This effort will include regional coordinators establishing plans with their local LEAs on the acceptance and crediting of partial coursework. The local school district homeless liaison is also educated in this matter and serves as the key contact for school districts, IUs, comprehensive career and technical centers (CTCs), and brick-and-mortar and cyber charter schools.

- vi. Describe the SEA's procedures to ensure that homeless children and youths:

1. Have access to public preschool programs, administered by the SEA or LEA, as provided to other children in the State;
2. Who meet the relevant eligibility criteria, do not face barriers to accessing academic and extracurricular activities; and
3. Who meet the relevant eligibility criteria, are able to participate in Federal, State, and local nutrition programs.

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Public Preschool Access. The Office of the State Coordinator for Homeless Education collaborates and coordinates with the PDE’s Office of Child Development and Early Learning programs, as well as other federally and locally funded preschool programs- Head Start and Early Head Start, Title I-A preschools, and other contracted community agency preschool programs. Homeless children will be afforded access to public preschool programs in Pennsylvania by providing training to local liaisons, school staff, shelter employees, public librarians, and other community partners on what schools and intermediate units offer preschool; how they can apply; and what qualifies students under McKinney-Vento. Informational posters will be placed in various areas in the community.

Whenever possible, age-appropriate children experiencing homelessness are placed in a Head Start program. If it is determined that a younger student should be in a public pre-K classroom, and this classroom exists in a district, that student will be provided this placement. Head Start and other pre-school program staff are included in state, regional and local trainings and meetings to encourage and facilitate cross-system collaboration. Collaboration on the statewide level within and among various state departments occurs as needed. This collaboration includes the PA Department of Human Services (DHS) and the Office of Child Development and Early Learning (OCDEL) in the PA Department of Education (PDE). ECYEH regional and site coordinators participate in Local Interagency Coordinating Councils and other groups focused on ensuring appropriate educational opportunities for younger children. Information can also be accessed on PDE’s [website](#).

Access to Academic and Extracurricular Activities. Academic and extracurricular activities can be facilitated by providing transportation, offering tutoring services, and assisting with required uniforms. Facilitating admissions to magnet school and charter school programs can be accomplished by regional coordinators requesting that schools reserve slots for eligible McKinney-Vento students, or place them on priority waiting lists if no slots are available after the school year has begun. Regional offices will work diligently to reconnect students with their school of origin, when possible, which greatly reduces the possibility of losing credits for coursework. Regional offices will focus efforts on training local liaisons and providing adequate resources and support to aid in the removal of these barriers, ensuring that liaisons are aware of all aspects of these duties. LEAs coordinate efforts within the LEA and with other agencies (as needed) to provide homeless students access to the following services/programs:

- Extracurricular activities;
- High-rigor coursework, including AP, IB, and dual enrollment;
- Online educational opportunities;
- Career and technical education;
- Gifted and talented education;
- Extended day/year (summer) programs including 21st Century, and
- Unique admissions programs (e.g., magnet schools, early college).

During LEA monitoring, if an LEA is found to be in violation of procedures for removing such barriers, the LEA is required to create a compliance plan with action steps and timelines toward removing barriers thereby providing full access to all academic or extracurricular activities. PDE will follow up with such LEAs to ensure fidelity of implementation.

vii. Describe the SEA’s strategies to address problems with respect to the education of homeless children and youths, including problems resulting from enrollment delays and retention, consistent with sections 722(g)(1)(H) and (I) of the McKinney-Vento Act.

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Local liaisons will work with the school of origin to acquire health records for McKinney-Vento students; local liaisons will also school and community health professionals to help McKinney-Vento students receive any additional immunizations that may be required.

i. residency requirements;

Local liaisons and regional coordinators will acquire documentation from the school of origin. If they are unable to acquire necessary proof of residency, and, after an investigation, conclude that they are eligible for McKinney-Vento services, urban districts will provide a standard enrollment form for families experiencing homelessness. Other LEAs create a form for their schools in consultation with guidance from the SEA. Lack of specific residency paperwork will not be a barrier to enrollment.¹⁴⁷ The regional and site staff review the specific LEA policies which guide their work with students experiencing homelessness and offer advice or guidance in updating policies and practices that could act as barriers to school enrollment. The regional staff provides examples of exemplary school district homeless policy statements on their regional websites as a reference tool for LEAs updating their policies and practices.

ii. lack of birth certificates, school records, or other documentation;

Regional coordinators and local liaisons will work with the school of origin and the local vital statistics office to obtain birth certificates and school records. School enrollment for students experiencing homelessness is nearly immediate – the regional office uses a verification form to document the homeless status of the student/family to ensure there are no delays in enrollment. The Basic Education Circular (BEC) referred to above addresses issues related to documentation for children experiencing homelessness and states that “liaisons are required to assist children and youths who do not have documentation of immunizations or medical records to obtain necessary immunizations or necessary medical documentation” and that “the selected school shall immediately enroll the child or youth in school, even if the child or youth lacks records normally required for enrollment, such as previous academic records, medical records, proof of residency or other documentation.” Regional and site staff conduct ongoing training and awareness efforts with LEAs and providers in their respective regions.

iii. guardianship issues; or uniform or dress code requirements.

Regional coordinators and local liaisons will gather information from parents, guardians, county children and youth personnel, and DHS personnel. Until guardianship is clarified, McKinney-Vento students are eligible to remain at their current school until guardianship has been settled. PDE’s BEC on Homeless Education addresses all aspects of mandates of the law with regard to children who are not under the supervision of their parent, but with a guardian.¹⁴⁸

Pennsylvania mandates that the board of school directors of a school district in which there is located an agency, supervised or licensed shelter, group home, maternity home, residence, facility, orphanage or other institution for care or training of children or adolescents, shall admit to the district’s public schools school-aged children who are living at or assigned to the facility or institution and who are residents of

¹⁴⁷ PDE’s updated Basic Education Circular 42 U.S.C. § 11431 Education for Homeless Youth includes language from new legislation from McKinney-Vento reauthorization is distributed to school districts and provider agency personnel, which explain that for enrollment purposes students experiencing homelessness, do not need to prove residency. The annual *Back to School letter* includes the Basic Education Circular as an attachment.

¹⁴⁸ <http://www.education.pa.gov/K-12/Homeless%20Education/Pages/default.aspx#tab-1>

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the district or another district in Pennsylvania.¹⁴⁹ Further, the definition of “supervised or licensed shelters” includes those facilities which provide temporary shelter for a specified, limited period of time. Therefore, children in temporary shelters and children who “lack a fixed, regular, adequate night time residence” – homeless children – are entitled to free school privileges from either the school district in which their person or the shelter is located or the school district of origin.

Homeless students who may reside in hotels, motels, cars, tents, or are temporarily doubled-up with a resident family due to lack of housing are presently unable to establish “homes” on a permanent basis are not required to prove residency regarding school enrollment and must be enrolled without delay in the district where they are presently residing or continue their education in the district of prior attendance.

In terms of school uniform requirements, the ECYEH regional and site coordinators will work with school districts to obtain the uniforms either from the school districts at no cost or will use McKinney-Vento funds or donations to purchase them, if possible, depending on availability of funding. Some regional or site staff also solicit donations that can meet the students’ needs for uniforms or appropriate school attire. Uniforms are an allowable use of McKinney-Vento funds; regional coordinators and local liaisons may purchase necessary clothing and uniforms for school attendance. Uniform vouchers can be provided to parents or unaccompanied youth. Items will be acquired as soon as possible; students identified as McKinney-Vento students will have this requirement waived until uniforms can be obtained.

Removal of Barriers, Including Fines and Fees. The SEA will ensure that regional coordinators and their staff train LEAs on McKinney-Vento guidelines that limit barriers to academic and extracurricular activities. LEAs cannot refuse participation in any extracurricular activities for students; strategies will be utilized to eliminate barriers. Such strategies would include, but are not limited to, the following:

- Utilizing Title I part A funds (to waive fees, purchase uniforms or equipment, etc.);
- Carpooling with parents/guardians and other students to different activities; and
- School districts providing vans when appropriate.

These funds will also be utilized to contract tutoring services for students who are struggling academically. SEA staff work with local LEAs to ensure that school/district policies and procedures do not create barriers for children and youth experiencing homelessness. The SEA works with local school districts to remove all fees, fines, and absence reports once a student has been identified as homeless. The SEA shares sample exemplary policy statements (including provisions related to removing barriers to the identification, enrollment and retention of homeless children and youth in schools in the state) with schools/LEAs, and reviews existing policies to offer suggestions for policy revisions to ensure they do not pose barriers for these students. Finally, the Department works to review and revise, as necessary, policies to remove barriers to the identification of homeless children and youth, and the enrollment and retention of homeless children and youth in schools statewide including barriers to enrollment and retention dues to outstanding fees, fines and absences.

¹⁴⁹ Ibid.