

Prompt and Proper Placement: Enrolling Students Experiencing Homelessness without Records¹

This tip sheet:

- outlines McKinney-Vento Act requirements related to immediate enrollment and school records for students experiencing homelessness, and
- suggests strategies to help school districts develop a streamlined approach to initial student assessment when complete school records are not present.

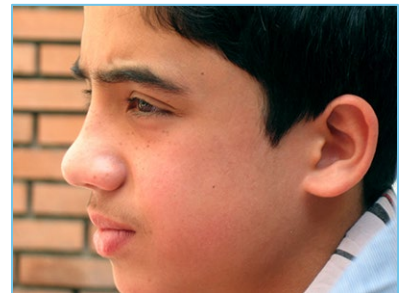
Context

Enrolling [children and youth experiencing homelessness](#) in school immediately is required under the federal McKinney-Vento Homeless Assistance Act and helps limit the educational disruption and disconnection often caused by homelessness. And yet, students experiencing homelessness may not be able to provide documentation normally required at the time of school enrollment, leaving districts with the challenge of assessing a student’s current academic standing without complete records. Sound decisions about classroom placement help minimize potential disruptions to students and teachers, and helps students continue to accrue credits and make progress towards requirements for grade advancement and high school graduation. This tip sheet offers local homeless education liaisons (local liaisons), school counselors, teachers, and other school personnel information and tools to help make sound educational decisions for the prompt placement of students experiencing homelessness in appropriate classroom settings.

Immediate Enrollment and School Records under the McKinney-Vento Act

Under [Subtitle VII-B of the McKinney-Vento Homeless Assistance Act](#), as amended by Title IX, Part A, of the Every Student Succeeds Act:

- Schools must **enroll students experiencing homelessness immediately**, even if they are unable to provide records normally required for enrollment—including previous academic records, immunization and other required health records, proof of residency, or other documentation—and even if they have missed application or enrollment deadlines during any period of homelessness [42 U.S.C. §11432(g)(3)(C)(i)]. Enrollment is defined as “attending classes and participating fully in school activities” [42 U.S.C. §11434a(1)].
- Enrolling schools must immediately **contact the school last attended by the student** experiencing homelessness to obtain relevant academic and other records [42 U.S.C. §11432(g)(3)(C)(ii)].
- If students experiencing homelessness need to obtain immunizations or other required health records, the enrolling school must immediately refer the parent, guardian, or unaccompanied



¹ This resource is adapted from a previous resource developed by the [National Center for Homeless Education](#) in 2006.

homeless youth to the local liaison to **assist with obtaining needed immunizations, screenings, or immunization or other required health records** [42 U.S.C. §11432(g)(3)(C)(iii)].

- Schools must keep student records — including immunization or other required health records, academic records, birth certificates, guardianship records, and evaluations for special services or programs — so that the **records are available in a timely fashion** when a student experiencing homelessness enters a new school or district [42 U.S.C. §11432(g)(3)(D)(i)].
- State education agencies (SEAs) must identify and remove barriers that prevent students experiencing homelessness from **receiving appropriate credit for full or partial coursework satisfactorily completed** while attending a prior school, in accordance with state, local, and school policies [42 U.S.C. §11432(g)(1)(F)(ii)].
- [California’s AB 1806](#) amended [state Education Code §51225.1](#) to require school districts to exempt a student experiencing homelessness who has transferred between schools any time after the completion of the student’s 2nd year of high school from all coursework and other requirements adopted by the district that are in addition to certain statewide coursework requirements unless the district finds that the student is reasonably able to complete the district’s graduation requirements in time to graduate from high school by the end of the student’s 4th year of high school. Enrolling high schools must notify the student experiencing homelessness or their educational decisionmaker of the **availability of the AB 1806 graduation exemption** and whether the student qualifies within 30 calendar days of the student’s transfer into the school.

Gathering Existing Information



To minimize academic disruption for students experiencing homelessness, enrolling schools should conduct a quick analysis of all available information. Consider these strategies for gathering existing information, including academic records; report cards; tests; homework; immunization or other medical records; individualized education programs (IEPs) or special education referrals, evaluations, meeting notes; and any other school papers or information the previous school, parent, or student may have:

- Enrolling schools should **contact the student’s previous school immediately for school records**. In cases where the previous school is closed in the wake of a disaster, enrolling schools should contact the previous school district office or State Coordinator for Homeless Education to see what records or academic information might be available in electronic or other form. Note that the Family Educational Rights and Privacy Act (FERPA) allows for the transfer of student education records between a student’s previous school and a school into which a student is transferring or enrolling without parent (or eligible student) permission [34 C.F.R. §99.31(a)(2)].
- For students recently arrived from other countries, it may be helpful for enrolling schools to **work with resettlement agencies or the [consulate](#) in the country where the student lived previously** for assistance with locating needed documentation. Consult the U.S. Department of Education’s [Finding the Right Starting Point: Obtaining, Interpreting, and Evaluating International Transcripts](#) for more information.

- If a student’s records have been damaged or destroyed or are otherwise unavailable, enrolling schools should begin to **build new student records immediately** based on information gathered from parents, students, local- or state-level student databases, and other reliable sources.
- While waiting for official records, if phone/e-mail contact information is available, it may be helpful for enrolling schools to **speak with the student’s previous teachers, school counselors, and other school personnel** familiar with the student’s education for informal assistance with placement decisions.
- It may be helpful for enrolling schools to **speak with parents and students themselves**, as they often can provide useful information that may help the school understand the student’s abilities and needs. Conversations with parents and students can take place informally using simple, descriptive questions to learn about the student’s prior school engagement and performance. **Questions to ask parents** might include:
 - Do you have any papers from the previous school, such as notes from teachers, homework assignments, tests, progress reports, or any other papers?
 - Have you worked with your child on any recent homework assignments? If so, what were the assignments about?
 - What were your child’s grades like? What does your child find easy in school? What does your child find hard in school?
 - Did you ever go to a meeting at school with teachers, a doctor, or someone from the school district office? If so, what did you talk about during the meeting?
 - Did you ever sign any papers that talked about goals or special school services for your child?

Questions to ask students might include:

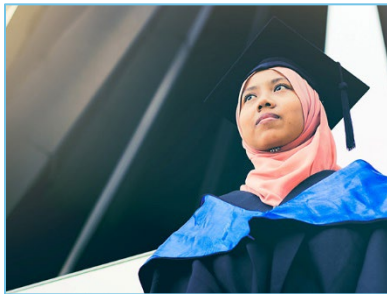
- What was your school day like?
- Do you remember the names of any of your books or what the covers looked like?
- What was the name of your math/history/science/language class?
- What were you learning in your math/history/science/language class?
- What were some of your recent homework assignments? Do you have any old homework assignments, tests, notes from teachers, or other papers from school?
- How many kids were in your class? How many teachers were in your class?
- Did you ever spend time alone or in a small group with a different teacher?
- Did you ever spend time alone or in a small group in a different classroom?
- What were your grades like?

Informing Classroom Placement Using Assessment Tools

Although schools should continue to seek existing records from all available sources, there may be times when student records are unavailable or will be delayed. In these instances, a quick, valid, and reliable assessment of student academic placement needs is critical. Schools can use any of a variety of educational assessment tools, many of which may already be in use in schools by school psychologists, special education teachers, and classroom teachers as part of their routine screening and diagnostic processes. The enrolling school's diagnostic team should discuss which instrument(s) may be most appropriate for assessing the skills and needs of individual students.



Additional Resources



Schools may wish to consult the following related resources:

- [Enrolling Children and Youth Experiencing Homelessness in School](#) webpage (National Center for Homeless Education [NCHE])
- [Credit Accrual](#) webpage (NCHE)
- Sample [California AB 1806 resources](#) (Fresno County Office of Education)



A California Homeless Education Technical Assistance Center (HETAC) Resource
Funded by the California Department of Education
August 2022
hetac.org