

PERFORMANCE AUDIT



Office of the
Washington
State Auditor
Pat McCarthy

Opportunities to Better Identify and Serve K-12 Students Experiencing Homelessness

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State Auditor’s Office contacts

State Auditor Pat McCarthy

360-902-0360, Pat.McCarthy@sao.wa.gov

Scott Frank – Director of Performance and IT Audit

360-902-0376, Scott.Frank@sao.wa.gov

Christopher Cortines, CPA – Assistant Director for Performance Audit

206-355-1546, Christopher.Cortines@sao.wa.gov

Melissa Smith – Principal Performance Auditor

360-725-5579, Melissa.Smith@sao.wa.gov

Sohara Monaghan – Senior Performance Auditor

360-725-5616, Sohara.Monaghan@sao.wa.gov

Corey Crowley-Hall – Performance Auditor

360-725-5380, Corey.Crowley-Hall@sao.wa.gov

Holland Kitchell – Performance Auditor

360-725-5633, Holland.Kitchell@sao.wa.gov

Nancy Patino – Performance Auditor

360-725-5360, Nancy.Patino@sao.wa.gov

Kathleen Cooper – Director of Communications

360-902-0470, Kathleen.Cooper@sao.wa.gov

To request public records

Public Records Officer

360-725-5617, PublicRecords@sao.wa.gov

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Executive Summary

Background (page 8)

Washington has the eighth-highest rate of identified student homelessness in the country. The number of identified homeless students in Washington's kindergarten through 12th grade (K-12) education system has grown to more than 40,000. This marks more than a 30 percent increase in student homelessness between the 2012-13 and 2016-17 school years. Student homelessness in Washington's schools is caused by a combination of factors, including economic trends and family crisis. School districts are responsible for identifying homeless students and ensuring their educational success. The Office of Superintendent of Public Instruction (OSPI) and the Department of Commerce (Commerce) are responsible for supporting school districts' efforts to assist these students. However, the needs of homeless students are diverse and complex, extending beyond services schools typically provide.

Homelessness is a stressful experience that profoundly affects students' well-being and ability to succeed in school. The growing proportion of homeless students in the state's K-12 population has prompted stakeholder interest into the problems facing homeless students, what educational and other agencies are doing to identify and help them, and which strategies can most effectively improve these agencies' efforts. This audit evaluated efforts by OSPI and school districts, and identified opportunities to strengthen how these agencies identify, support and connect homeless students to services they need to succeed academically. The audit also obtained insights about K-12 student homelessness and examined how school districts, OSPI and Commerce use dedicated funding to assist these students.

While most homeless students do not live on the street or in a shelter, homelessness is still a stressful experience that adversely affects their well-being and education (page 12)

The vast majority of homeless students do not live in shelters or on the street, but instead live with others — a practice called “doubling up.” While doubling-up might not seem as severe as living in shelters or on the street, these students have similar educational outcomes. Homeless students are found in similar proportions in rural and urban areas, and on the east and west side of the state. Regardless of the place or the manner in which homeless students live, homelessness is a stressful experience that adversely affects students' well-being and education.

School districts do not receive enough McKinney-Vento and HSSP grant funding to identify and support homeless students (page 17)

Federal McKinney-Vento grants and the state's Homeless Student Stability Program (HSSP) grants are the primary sources of funding to help districts identify and support homeless students. Districts receive a combined total of about \$2.5 million a year through these programs, but estimate they need closer to \$29 million to identify and support homeless students. Although almost all districts have homeless students, few receive McKinney-Vento or HSSP funding to assist them. Without sufficient dedicated funding, districts have to redirect other funds or limit their ability to identify and support homeless students. Though it would not address the core problem of insufficient funding, OSPI and Commerce could make it easier for districts to access and use the available funds.

Comprehensive screening, communication and training strategies can help districts address gaps in their approaches to improve identification of homeless students (page 22)

Nearly all school districts use three primary strategies to identify students experiencing homelessness: distributing a housing questionnaire, posting information on school grounds, and appointing and training a district homeless liaison. Addressing gaps with primary identification strategies can help districts improve identification of homeless students. In addition to improving existing strategies, districts could also use student data better to identify students who might be experiencing homelessness.

Changes to policies and practices in enrollment and academic flexibility can help school districts better support homeless students (page 27)

Schools are required to immediately enroll homeless students because delays can cause further disruption to their education and well-being. One-third of the districts we interviewed told us they do not fully enroll students until they have essential records from the previous school. School districts can help ensure immediate enrollment of homeless students by training staff on legal requirements, provisionally placing students in class, and clarifying records transfer policies.

Moreover, because of the disruptions homelessness inflicts on learning, homeless students often need more flexibility than other students to do well in school. Offering more flexibility with assignments can help homeless students complete schoolwork, which is essential for learning and on-time graduation. Districts should also offer homeless students alternative opportunities to earn credit, as required by law.

Parental involvement can help districts and families make school placement decisions based on what is best for the student's academic success (page 35)

Federal law requires school districts to use student-centered factors when determining school placement for homeless students. Homeless students often face difficult trade-offs between changing schools and long commutes, both of which can affect their education. Districts can educate families to help them weigh whether it is more beneficial for the student to change schools or maintain a long commute. Districts can also achieve additional benefits by involving families in the development of students' transportation plans.

Districts can address some of the financial implications of transporting homeless students outside district boundaries through use of cost-saving strategies (page 38)

Many homeless students need to be transported outside of district boundaries, which can be costly for school districts. The state's student transportation funding model compounds the financial effect of transporting students out-of-district because it does not fully reimburse about half the districts. School districts have several options to help reduce student transportation costs:

- Claim reimbursement for all eligible student transportation costs, regardless of the mode of transportation
- Establish formal inter-district transportation agreements to share responsibilities and costs
- Use other alternatives, including providing public transit passes, gas cards or mileage reimbursements to families

School districts could better connect homeless students to community services through improved partnerships with Coordinated Entry and other resources (page 41)

Federal law requires school districts to connect homeless students with community resources to address needs that extend beyond services districts typically provide. The most important step districts can take in connecting students with resources is to partner with their counties' Coordinated Entry agencies. Improved partnerships and referrals can help districts better connect homeless students to other resources. Some school districts have taken extraordinary steps to further increase homeless students' access to services.

OSPI and WSSDA could increase support for school districts through additional guidance, training and resources (page 47)

OSPI and the Washington State School Directors' Association (WSSDA) play supportive roles in helping school districts address student homelessness statewide. OSPI supports district efforts to assist homeless students by providing funding, guidance, training and resources. WSSDA supports districts' efforts through model policies and procedures. OSPI and WSSDA can address some school districts' needs by providing additional guidance, especially on best practices and interpretations of the law. OSPI could also expand its training delivery and content to address districts' needs. Finally, OSPI could consider facilitating an online forum for homeless liaisons to share information statewide, similar to what other states have implemented.

State Auditor's Conclusions (page 51)

Homelessness among students in the K-12 education system is a significant and growing issue in Washington. It is a stressful experience that has real consequences for the student's education. It should come as no surprise that students who experience homelessness miss classes, change schools and fail to graduate high school far more frequently than other students.

The problem of youth homelessness is a far bigger issue than schools can reasonably be expected to solve. However, schools are in a unique position because they are a hub for the vast majority of children. Federal law requires schools

to identify students who experience homelessness and connect them with the services and supports they need to succeed academically. Unfortunately, the cost for schools to meet these obligations far exceeds the dedicated state and federal funding that is available. In the absence of additional resources, the purpose of this audit was to identify actionable options to help schools. These options include actions schools can take themselves to better identify and serve homeless students. OSPI, WSSDA and the Department of Commerce also have options to better assist schools in their efforts.

Understanding the complex underpinnings of homelessness, especially as it affects children, is an important focus of public policy work in all levels of government. This audit provides key pieces of information on some baseline issues facing homeless students, including housing and transportation needs, as lawmakers and communities consider how to respond to this growing challenge.

Recommendations (page 52)

We made a series of recommendations for school districts to implement strategies that can help them strengthen identification of, provision of in-school supports for, and connections to community services for students experiencing homelessness. We also recommended that OSPI and WSSDA increase support for school districts through additional guidance, training and resources. Finally, we recommended that OSPI and Commerce make it easier for districts to access and use available funds to meet students' needs.

Next steps

Our performance audits of state programs and services are reviewed by the Joint Legislative Audit and Review Committee (JLARC) and/or by other legislative committees whose members wish to consider findings and recommendations on specific topics. Representatives of the Office of the State Auditor will review this audit with JLARC's Initiative 900 Subcommittee in Olympia. The public will have the opportunity to comment at this hearing. Please check the JLARC website for the exact date, time and location (www.leg.wa.gov/JLARC). The Office conducts periodic follow-up evaluations to assess the status of recommendations and may conduct follow-up audits at its discretion. See **Appendix A**, which addresses the I-900 areas covered in the audit. **Appendix B** contains information about our methodology.

Background

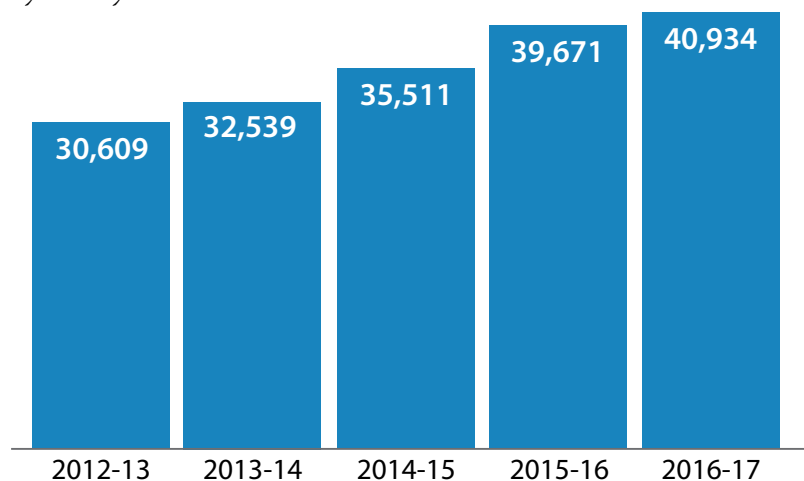
The number of homeless students in Washington's K-12 education system continues to grow

School districts in Washington have identified more than 40,000 students who are experiencing homelessness. This marks more than a 30 percent increase in student homelessness between the 2012-13 and 2016-17 school years (see **Exhibit 1**).

Washington has the sixth-highest number of identified homeless students and the eighth-highest rate of identified student homelessness in the country (**Appendix C**).

Exhibit 1 – Number of identified homeless students in Washington's K-12 education system, 2012-2017

By school year



Source: OSPI data.

Many factors contribute to homelessness for Washington's school-age children and youth. This audit interviewed families experiencing homelessness and school district staff, and both groups listed several underlying causes of student homelessness: the high cost of housing; unemployment; and family crises such as domestic conflict and violence, eviction and medical emergencies. Additional examples they gave include students who become homeless because they stay behind when a parent moves to another town; families following agricultural work who then find local housing unaffordable or in limited supply; and teenagers who leave their homes due to pregnancy.

Stakeholders noted that the preferred term for this population is "students experiencing homelessness." This report also uses the term 'homeless students' or simply 'students' when there is no risk of confusing them with students living in permanent homes.

Students experiencing homelessness have diverse and complex needs, extending beyond services schools typically provide

Homeless students and families reported many needs, from basics such as food, shelter and clothing, to flexible school policies and practices related to assignments, bell times and credit transfer. These students and families as well as district staff also described the need for emotional and mental health support to help them cope with the emotional distress associated with homelessness, and for safe, quiet spaces to do schoolwork.

Certain situations call for even more complex or extensive services. For example, students living without a parent or guardian said they need help learning life skills as well as obtaining documentation that will allow them to live independently as minors. Students fleeing domestic violence need help accessing housing, transportation and school enrollment, each made more difficult by concerns about confidentiality and physical safety or the terms of a restraining order. Some migrant students may need extra help finding available support and services due to language barriers.

School districts are able to meet some needs, but find it harder to connect students to critical support and services that are outside the districts' traditional, educational role. For example, school districts can feed students during school hours through the free and reduced-price meal program, transport them to and from school with state and federal funding, and offer hygiene supplies and clothing through community donations. However, they face greater challenges helping students access food outside school hours, transportation to appointments with providers in the community, medical and mental health support, and the essentials of housing and quiet spaces to study.

School districts are responsible for identifying students experiencing homelessness, providing in-school support, and connecting them to community services

To improve the educational success of homeless students, the federal law known as the McKinney-Vento Act requires that school districts identify these students, provide them with in-school supports, and connect them to community services they need to succeed.

Key provisions of the McKinney-Vento Act require that school districts do the following for homeless students:

- Enroll them immediately, even if they lack records
- Serve them free breakfast and lunch
- Transport them to and from school
- Identify organizations in the community that provide services these students need, and develop partnerships and referral protocols to connect students to these services
- Appoint a homeless liaison to oversee the district's efforts to identify and support students in homeless situations. The district is also responsible for training other school staff on how to identify and support these students.
- Revise any policies or practices that act as barriers to the enrollment, attendance, retention and academic success of these students

Additionally, the state Legislature passed the Homeless Students Stability and Opportunity Gap Act in 2016. This law requires that each school district that has identified more than 10 unaccompanied homeless youth must designate a homeless liaison at each middle and high school.

The Office of Superintendent of Public Instruction and the Department of Commerce are responsible for supporting school districts' efforts

The McKinney-Vento Act requires the Office of Superintendent of Public Instruction (OSPI), the state's education agency, to support school districts' efforts to identify and assist students experiencing homelessness. OSPI distributes McKinney-Vento grant funding and provides training, guidance and technical assistance to school districts. The agency also is responsible for monitoring school districts' compliance with McKinney-Vento requirements.

The Homeless Students Stability and Opportunity Gap Act authorized the establishment of the Homeless Student Stability Program (HSSP). This program is jointly administered by OSPI and the Department of Commerce (Commerce), each responsible for different components. OSPI administers grant funding to schools selected through a competitive process; money must be spent to increase identification of students and build homeless education program capacity in schools. Commerce also administers grant funding to selected school districts. The purpose of the Commerce grants is to develop and strengthen partnerships between school districts and community agencies that can improve housing stability for homeless students.

This audit identified opportunities to strengthen how school districts and OSPI identify and serve homeless students

Homelessness is a stressful experience that profoundly affects students' well-being and ability to succeed in school. The growing number of homeless students in the state's K-12 population has prompted stakeholder interest into the problems facing homeless students, what educational and other agencies are doing to identify and help them, and which strategies can most effectively improve these agencies' efforts. This audit evaluated efforts by OSPI and school districts, and identified opportunities to strengthen how these agencies identify, provide in-school support for and connect homeless students to community services they need to succeed academically. The audit answers the following questions:

1. What are the characteristics, needs and causes of K-12 student homelessness in Washington's school districts?
2. How have school districts used McKinney-Vento and Homeless Student Stability Program funding to identify students experiencing homelessness, provide them with in-school supports, and connect them to community services?
3. What opportunities exist to help school districts and OSPI strengthen identification, provision of in-school supports, and connections to community services for students experiencing homelessness?

To address the many complexities we found in answering question 3, the report breaks the answer into five topic areas:

- Improving identification of homeless students through comprehensive screening, communication and training strategies
- Improving policies and practices in enrollment and academic flexibility
- Increasing parental involvement and use of cost-saving strategies to minimize the educational and financial effects of transporting homeless students outside district boundaries
- Improving partnerships with Coordinated Entry agencies and other resources to better connect students to services they need
- Increasing OSPI and WSSDA's support to districts to help them better identify and assist students

Audit Results

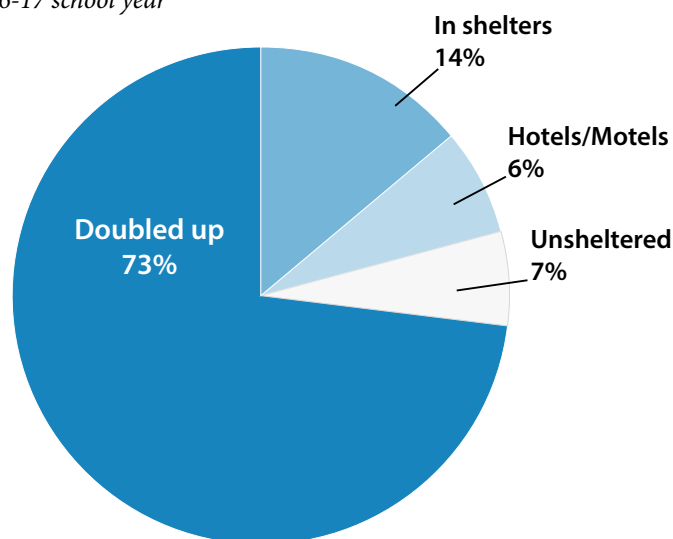
While most homeless students do not live on the street or in a shelter, homelessness is still a stressful experience that adversely affects their well-being and education

The vast majority of homeless students do not live in shelters or on the street, but instead live with others – a practice called “doubling up.” While doubling up might not seem as severe as living in shelters or on the street, these students have similar educational outcomes. Homeless students can be found in similar proportions in rural and urban areas, and on the east and west side of the state. Regardless of the place or the manner in which homeless students live, homelessness is a stressful experience that adversely affects students’ well-being and education.

The vast majority of homeless students do not live in shelters or on the street, but instead live with others – a practice called “doubling up”

School districts and the Office of Superintendent of Public Instruction (OSPI) use the federal McKinney-Vento definition of homelessness. This definition encompasses students living unsheltered or in shelters, in hotels or motels, and with other people due to loss of housing, economic hardship or similar reasons such as family crisis (also known as “doubling up”). At any given time, nearly three-quarters of Washington’s homeless students in kindergarten through 12th grade live doubled-up with friends or other families, as shown in **Exhibit 2**. Homeless students living in doubled-up arrangements are eligible for the same educational support and services as other homeless students. While doubled-up homelessness is common across the state, it is more prevalent in rural areas and for students who are English language learners.

Exhibit 2 – 73% of students experiencing homelessness live in doubled-up arrangements
2016-17 school year



Source: Auditor analysis of OSPI homeless student data.

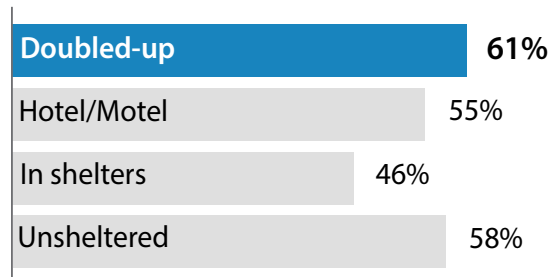
The housing situation for many homeless students is fluid and they might move from one living arrangement to another over time. Moreover, about 15 percent of these students in any living arrangement are also unaccompanied, meaning they do not live with a parent or guardian.

While doubling-up might not seem as severe as living in shelters or on the street, these students have similar educational outcomes

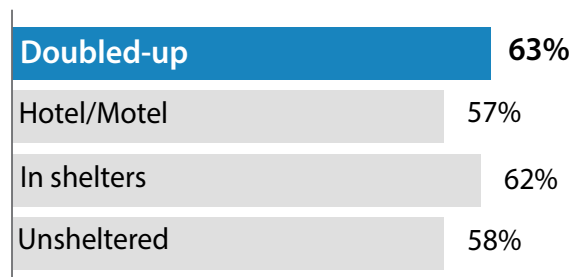
We analyzed data on high school graduation, school attendance and school mobility for homeless students in various living arrangements, with and without a parent or guardian. While doubled-up situations might not seem as damaging to students' education as other forms of homelessness, the analysis shows these students have similar outcomes. For example, as Exhibit 3 illustrates, in the 2016-17 school year, the high school graduation rate for homeless doubled-up students was just 3 percent better than for those living unsheltered. Similarly, regular school attendance and school mobility rates for doubled-up students were only 1 percent and 2 percent better than for those living in shelters. Some district staff noted that doubled-up living conditions do not provide the best environment for completing schoolwork because they are too crowded and distracting.

Exhibit 3 – Students living in doubled-up arrangements have outcomes similar to other homeless students
2016-17 school year

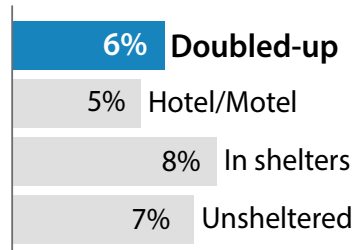
High school graduation rates



Regular school attendance rates



School mobility rates

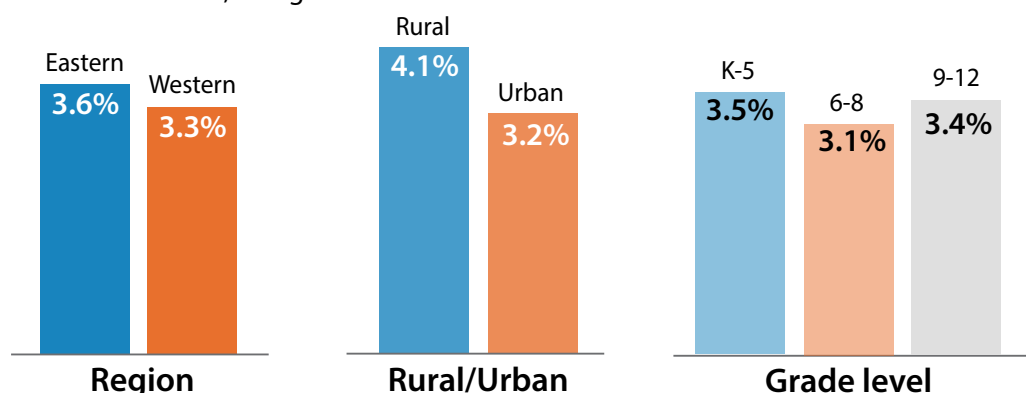


Source: Auditor analysis of OSPI homeless student data.

Homeless students can be found in similar proportions in rural and urban areas, and on the east and west side of the state

While homelessness is often thought of as a problem common to big cities, students experience homelessness in all parts of the state and at any age. In fact, as Exhibit 4 shows, student homelessness is slightly more common in rural areas than in urban areas (4.1 percent compared with 3.2 percent), and in eastern Washington than in western (3.6 percent compared with 3.3 percent). Student homelessness is also distributed almost evenly across elementary, middle and high school grades.

Exhibit 4 – Rates of student homelessness by eastern and western regions, rural and urban areas, and grade level



Source: Auditor analysis of OSPI homeless student data for 2016-17 school year.

Homeless students attending small, rural school districts in eastern Washington have slightly better outcomes than those in large, urban districts in the west

We analyzed data on high school graduation, school attendance and school mobility for homeless students attending districts of various characteristics such as size and geography. The analysis shows homeless students attending small, rural school districts in eastern Washington have slightly better outcomes than those in large, urban districts in the west. In the past five years, small, rural districts in the east graduated a larger percentage of homeless students; however, large, urban districts in the west have been narrowing this gap. Homeless students in small, rural districts change schools less often during the school year than homeless students in large, urban districts. Finally, homeless students attend school more regularly in small, rural school districts on the east side.

For a five-year trend analysis on high school graduation, school attendance and mobility outcomes by living arrangement, for unaccompanied students, as well as by district characteristics, see [Appendix D](#).

Regardless of the place or the manner in which homeless students live, homelessness is a stressful experience that adversely affects students' well-being and education

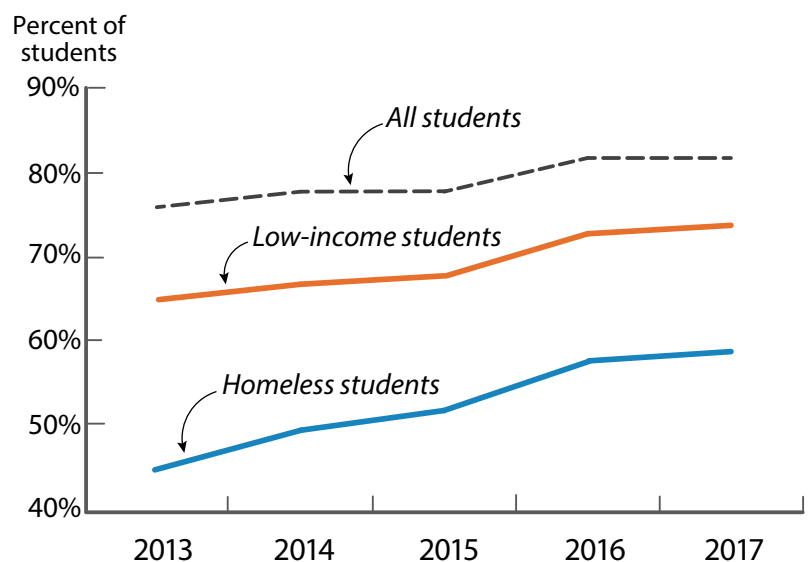
Housing instability creates many life stressors that affect students' well-being. Homeless students and families worry about being separated from each other by Child Protective Services and immigration authorities. They often have difficulty accessing services due to restrictive shelter rules. Families said students are often exhausted and hungry due to long commutes to and from school, food insecurity and living in an unstable home environment. These families also said they had to weigh difficult tradeoffs between school and housing, such as deciding whether to change schools during the school year when their housing situation changed. Unaccompanied youth even find themselves deciding whether to work for a living or finish school.

We analyzed OSPI student data on key measures districts said they hoped to improve with the supports they provide to homeless students: high school graduation, attendance and mobility. We analyzed data on these outcomes for a five-year period to determine if there have been improvements for homeless students. Comparison groups included all students and low-income students, which include those participating in the Free and Reduced-Price Lunch program (FRL). Participation in FRL is often used as a proxy measure for economically disadvantaged students.

Homeless students miss classes, change schools and fail to graduate high school at significantly higher rates than other students

The gap in high school graduation rates for homeless students and all students narrowed by 8 percentage points in the past five years (Exhibit 5). Despite the improvement, homeless students continue to graduate from high school at a significantly lower rate than all students and low income students. In the 2016-17 school year, about 60 percent of homeless students graduated from high school compared with more

Exhibit 5 – High school graduation rates for homeless students, low-income students and all students



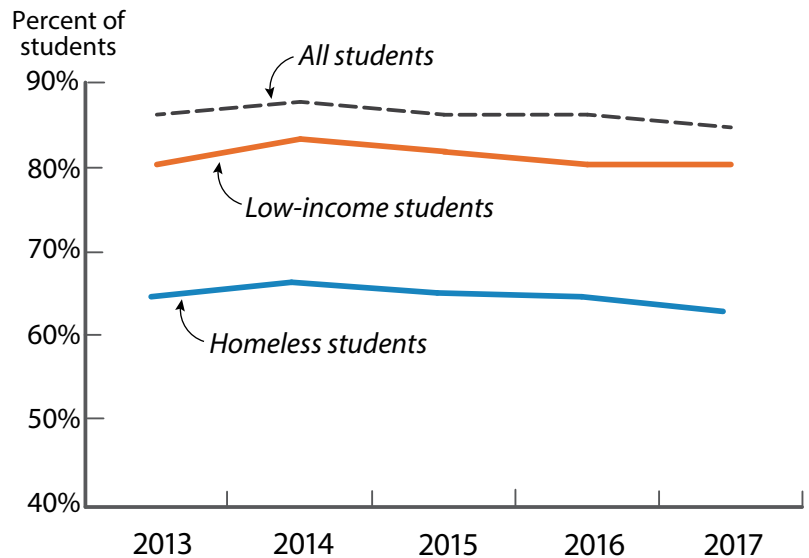
Source: Auditor analysis of OSPI student outcome data for 2016-17 school year.

than 80 percent of the general student population and 70 percent of low-income students.

The analysis shows no improvement in **school attendance** for homeless students in the past five years (**Exhibit 6**). OSPI defines students in regular attendance as those with two or fewer school absences in a 30-day period. In the 2016-17 school year, 62 percent of homeless students attended school regularly compared with 85 percent of the general student population and 80 percent of low-income students.

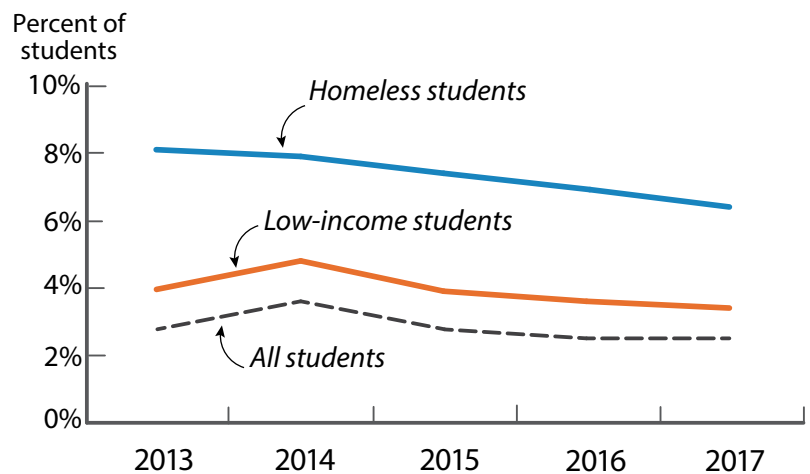
Finally, the analysis showed small improvements in **school mobility**, which is the number of times a student changes schools in a school year. In the 2016-17 school year, homeless students changed schools within a district twice as often as other students. This rate was only 2 percentage points lower than in 2013 (**Exhibit 7**).

Exhibit 6 – Regular school attendance rates for homeless students, low-income students and all students



Source: Auditor analysis of OSPI student outcome data for 2016-17 school year.

Exhibit 7 – School mobility rates for homeless students, low-income students and all students



Source: Auditor analysis of OSPI student outcome data for 2016-17 school year.

School districts do not receive enough McKinney-Vento and HSSP grant funding to identify and support students experiencing homelessness

Federal McKinney-Vento grants and the state's Homeless Student Stability Program (HSSP) grants are the primary sources of funding to help districts identify and support homeless students. Districts receive a combined total of \$2.5 million a year through these programs, but estimate they need closer to \$29 million to identify and support homeless students. Although almost all districts have homeless students, few receive McKinney-Vento or HSSP funding to assist them. Without sufficient dedicated funding, districts have to redirect other funds or limit their ability to identify and support homeless students. Though it would not address the core problem of insufficient funding, OSPI and Commerce could make it easier for districts to access and use the available funds.

Federal McKinney-Vento grants and the state's HSSP grants are the primary dedicated sources of funding to help districts identify and support homeless students

During the last school year, about \$3 million in combined McKinney-Vento and HSSP grant funding was spent on student homelessness. OSPI receives about \$1.1 million annually in McKinney-Vento funding from the U.S. Department of Education to support the state's homeless education program. OSPI distributes about 80 percent of this money to school districts selected through a competitive process. Grant awards are made based on criteria such as the number and rate of student homelessness in the district and the quality of the district's grant application. OSPI uses the remaining 20 percent to administer its Homeless Education Program, which provides training and guidance to school districts.

OSPI and Department of Commerce both receive state appropriations for their HSSP grant programs. In the 2017-18 school year, the Legislature allocated HSSP funds as follows:

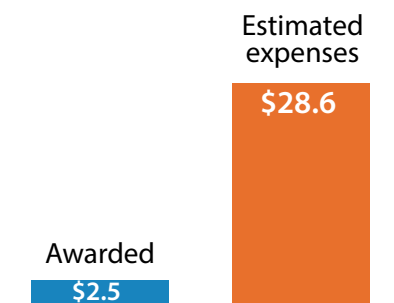
- \$1 million to OSPI to improve identification of, support and educational outcomes for homeless students
- \$1 million to Commerce to improve housing stability for homeless students

As with McKinney-Vento funding, the two agencies distribute HSSP grants to school districts selected through a competitive process. Selection criteria include the number and rate of student homelessness, the districts’ commitment to serving unaccompanied homeless youth, and, for Commerce, a demonstrated partnership with a housing provider.

Districts receive a combined total of \$2.5 million a year through these programs, but estimate they need closer to \$29 million to identify and support homeless students

The amount of McKinney-Vento and HSSP funding school districts receive is limited, which affects their ability to identify and support students who are experiencing homelessness. In the most recent school year, OSPI and Commerce distributed about \$2.5 million in funding to school districts. However, as Exhibit 8 illustrates, this represents less than a tenth of the estimated \$28.6 million that surveyed school districts said they spent on essentials such as the homeless liaison position and their training and development, student transportation, and enrollment records and fees.

Exhibit 8 – Total McKinney-Vento and HSSP funding awarded to school districts compared to estimated expenses
Dollars in millions



Source: Auditor analysis of statewide school district survey.

Although almost all school districts have homeless students, few receive McKinney-Vento or HSSP funding to assist them

About 90 percent of school districts have identified homeless students, but less than 15 percent receive McKinney-Vento or HSSP funding to help them. As already noted, OSPI and Commerce receive about \$3 million in combined McKinney-Vento and HSSP grant funding. Due to the limited amount, the two agencies face challenges awarding funding to all districts that need it while ensuring the amount each selected district receives can contribute meaningfully to achieving desired outcomes.

In the 2017-18 school year, 36 of the state’s 295 school districts received a combined \$2.5 million in McKinney-Vento and HSSP grant funding from OSPI or Commerce or both. Fifteen of them received two or all three of these grants. Grant amounts

awarded to each selected school district vary depending on the type of grant (Exhibit 9). For specific amounts granted to each district, see Appendix E.

School districts that receive McKinney-Vento and HSSP grant funding use it for activities essential to identifying and supporting homeless students. School districts surveyed report using McKinney-Vento funding to pay for the homeless liaison’s salary and training, and for transportation and academic supports for students. They used HSSP funding to develop partnerships with government and community organizations and to give students both academic supports and non-academic assistance, such as food and health care.

Exhibit 9 – Few of the state’s 295 school districts receive McKinney-Vento or HSSP grant funding

Dollars are rounded to the nearest thousand

Grant	McKinney-Vento	HSSP (OSPI)	HSSP (Commerce)
Total funding awarded	\$850,000	\$848,000	\$875,000
Number of school districts awarded grant	29	12	12
Amount of funding awarded to each selected district			
Minimum	\$17,000	\$4,000	\$25,000
Median	\$27,000	\$75,000	\$60,000
Maximum	\$47,000	\$111,000	\$270,000*

Note: Figures in this exhibit are estimates based on funding from the 2017-18 school year.

**This grant was shared by three districts.*

Source: OSPI and Commerce.

Without sufficient dedicated funding, districts have to redirect other funds or limit their ability to identify and support homeless students

School districts that receive little or no grant funding to pay a dedicated homeless liaison often resort to assigning the role’s responsibilities to existing district staff. These employees, who might include the superintendent, administrative staff, school counselor, or foster care and migrant program coordinator, already have full-time jobs. The limited staff capacity dedicated to the liaison function means less time devoted to identifying and supporting homeless students. Statewide, districts dedicate an average of 0.4 of one full-time equivalent homeless liaison position to student homelessness, which is, on average, less than 20 minutes with each homeless student each month. About 20 percent of school districts do not dedicate any employee time to homeless liaison duties. While the time to adequately perform the liaison’s duties will vary based on the number of students and their needs, about half of school districts interviewed said they would increase dedicated staff time if they had additional funding to pay for it.

School districts find themselves drawing on already constrained resources to meet the needs of homeless students. For example, federal law requires school districts to determine an appropriate amount of money to set aside from their Title I funds to support homeless students. Nearly all school districts surveyed reported that they use federal Title I, Part A funds to help homeless students. However, this funding is

intended to support all economically disadvantaged students in the district, not just those experiencing homelessness. Districts also use other resources, when available, such as school foundations, in-kind donations, philanthropic and nonprofit organizations, parent-teacher organizations, and county funds.

Though it would not address the core problem of insufficient funding, OSPI and Commerce could make it easier for districts to access and use available funds

Simplify the grant application to encourage more districts to apply for funding

Not all school districts that have homeless students apply for McKinney-Vento and HSSP funding. In the 2016-2019 McKinney-Vento grant cycle, 32 of the state's 295 school districts applied. OSPI awarded grants to 29 of these districts and rejected two because their applications were incomplete or of poor quality. Fewer than 20 school districts applied for an HSSP grant from Commerce. Most districts that apply for and receive McKinney-Vento or HSSP grants are medium- or large-sized districts in urban areas.

Sometimes districts choose not to apply for grant funding because they recognize they have neither the expertise nor the capacity to apply for and manage the grants. District staff interviewed said they found the grant applications confusing or too complicated. In the second year of HSSP grants, OSPI and Commerce used a combined application, which confused school districts about which grant they were applying for. Each agency now has its own application. Districts also find the year-to-year changes regarding allowable uses of HSSP grants from OSPI and Commerce confusing. For example, during the first year of the HSSP grant, Commerce allowed districts to use funds to provide rent assistance to homeless students and families, as permitted by state law. In the second year of the grant, Commerce no longer allowed use of the grant for rent assistance. However, the agency said it started allowing the grant to pay for hotel and motel stays for homeless families the following year. OSPI has also shifted how it prioritizes districts' use of the HSSP grant over time towards academics.

The Commerce HSSP grant application also requires school districts to have an already established relationship with service providers. Establishing these relationships often calls for time that might be beyond the capacity of most homeless liaisons.

Simplifying the grant application process would encourage more school districts to apply for grant funding. To further assist districts, these agencies could also make it easier for districts to use the available funds within the allowable uses of the grants, as explained below.

Provide more funding flexibility to help districts meet the needs of homeless students

OSPI can provide school districts more flexibility in how they spend McKinney-Vento and HSSP grants within the allowed uses to help meet the needs of homeless students. While districts can feed homeless students during school hours through the free and reduced-price meal program, they face greater challenges helping these students access food outside school hours. This is particularly a challenge in communities with scarce resources. Federal law allows districts to use the McKinney-Vento grant for food outside of school hours on a case-by-case basis, such as when the student is participating in a school activity and regular meals are not available. State law allows districts to use the HSSP grant to support homeless students and does not prohibit use of this grant for providing food to these students. However, OSPI applies the same McKinney-Vento requirements on how funding can be used to the state HSSP grant. OSPI generally tells districts to use community resources to meet food needs beyond school breakfast and lunches. But some district staff said they do not have enough community food resources and even when they do, that might not be a stable source students can count on.

As noted earlier, Commerce no longer allows school districts to use the Commerce HSSP grant for rent assistance, even though state law permits it. District staff said that allowing use of this grant for rent assistance is valuable because it helps them keep some students housed. Commerce provided the following reasons for the change: the agency says it is following federal guidance that recommends using Coordinated Entry to assess and prioritize households with the greatest needs for rent assistance. By following this guidance, the agency says they remain more competitive for federal funding. Additionally, Commerce wants to close a perceived “side door” access to rent assistance: the agency considers it more equitable if everyone applies for assistance through their county’s Coordinated Entry program.

While using Coordinated Entry as the mechanism to provide rent assistance has its benefits, doing so decreases the likelihood that doubled-up students will receive this type of support. Due to limited resources, Coordinated Entry programs do not prioritize assistance for doubled-up families, which includes the majority of homeless students. These programs prioritize assistance for people who are sleeping on the street, in cars or in shelters. (Coordinated Entry programs are discussed further on page 42.)

Comprehensive screening, communication and training strategies can help districts address gaps in their approaches to improve identification of homeless students

Nearly all school districts use three primary strategies to identify students experiencing homelessness: administering a housing questionnaire, posting information on school grounds, and appointing and training a homeless liaison. Addressing gaps with primary identification strategies can help districts improve identification of homeless students. In addition to improving existing strategies, districts could also make better use of student data to identify students who might be experiencing homelessness.

Nearly all school districts use three primary strategies to identify homeless students

Federal law requires that school districts identify students who are experiencing homelessness. Identifying these students is the first step in connecting them with the services and support they need to succeed. Because no single method alone can identify all homeless students, the National Center for Homeless Education recommends that school districts use a variety of strategies to increase identification, including screening, communication and training.

Almost all districts surveyed reported using three common strategies to identify homeless students: administering a housing questionnaire, posting information on school grounds, and appointing and training a district homeless liaison.

- Administering a housing questionnaire** – This questionnaire (Exhibit 10) asks families if they own or rent a home. If they do not, it asks them to describe their living situation. Ninety-five percent of school districts surveyed said that they use a housing questionnaire to screen students for homelessness, usually during student enrollment.

Exhibit 10 – Sample housing questionnaire

Student Housing Questionnaire

The answers to the following questions can help determine the services this student may be eligible to receive under the McKinney-Vento Act 42 U.S.C. 11435. The McKinney-Vento Act provides services and supports for children and youth experiencing homelessness. (Please see reverse side for more information)

If you own/rent your own home, you do not need to complete this form.

If you do not own/rent your own home, please check all that apply below. (Submit to District Homeless Liaison. Contact information can be found at the bottom of the page).

<input type="checkbox"/> In a motel	<input type="checkbox"/> A car, park, campsite, or similar location
<input type="checkbox"/> In a shelter	<input type="checkbox"/> Transitional Housing
<input type="checkbox"/> Moving from place to place/couch surfing	<input type="checkbox"/> Other _____
<input type="checkbox"/> In someone else's house or apartment with another family	
<input type="checkbox"/> In a residence with inadequate facilities (no water, heat, electricity, etc.)	

Name of Student: _____

First
Middle
Last

Name of School: _____ Grade: _____ Birthdate (Month/Day/Year): _____ Age: _____

Gender: _____ Student is unaccompanied (not living with a parent or legal guardian)
 Student is living with a parent or legal guardian

ADDRESS OF CURRENT RESIDENCE: _____

PHONE NUMBER OR CONTACT NUMBER: _____ NAME OF CONTACT: _____

Print name of parent(s)/legal guardian(s): _____
(Or unaccompanied youth)

*Signature of parent/legal guardian: _____ Date: _____
(Or unaccompanied youth)

*I declare under penalty of perjury under the laws of the State of Washington that the information provided here is true and correct.

Please return completed form to:

District Liaison	Phone Number	Location
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For School Personnel Only: For data collection purposes and student information system coding

(N) Not Homeless (A) Shelters (B) Doubled-Up (C) Unsheltered (D) Hotels/Motels

- **Posting information on school grounds about rights and services available for homeless students** – Federal law requires school districts to post information on school grounds to increase awareness about the rights of and services available for homeless students. Ninety-seven percent of school districts indicated that they post flyers with this information on school grounds. Flyers provide brief descriptions about who may qualify as homeless under the McKinney-Vento Act, the rights of these students, and whom to contact for assistance.
- **Appointing and training a homeless liaison on strategies to identify, approach, and serve homeless students** – Key provisions of the McKinney-Vento Act require that school districts appoint a homeless liaison to oversee the district's efforts to identify and support students in homeless situations. To better prepare the liaison for this role, the law requires that they receive training on identifying and serving homeless students. Ninety-seven percent of school districts indicated that their district liaison received training on the educational rights of homeless students and strategies for identifying, approaching and serving these students.

Addressing gaps with primary identification strategies can help districts improve identification of homeless students

While the primary strategies districts use do help them identify homeless students, the audit identified gaps in their approaches that lead to under-identification and delayed identification. District staff rarely said that they thought they had identified all the homeless students in their schools. Additionally, although poverty and homelessness are linked, several school districts with significant low-income student populations have not identified any homeless students.

Districts that fail to identify these students promptly cannot deliver needed services and support in a timely way to help students do well in school. The audit identified several strategies that, combined, can help districts address gaps in their approaches and make it more likely they identify these students.

Distribute the housing questionnaire multiple times to better identify students who become homeless

School districts generally distribute the housing questionnaire once a year, during student enrollment, which means this tool does not identify students who become homeless during the school year. The questionnaire also does not identify students inclined to hide their situation because they fear immigration authorities, stigma, or potential involvement from Child Protective Services. Additionally, district staff said some students do not return the questionnaire, while others might not indicate

they are homeless because they do not understand that their situation qualifies. Most of the 43 families interviewed were not identified through the housing questionnaire.

Districts can address some of the gaps with administering the housing questionnaire by:

- Distributing the questionnaire multiple times during the year at key events such as student assemblies, open houses and parent-teacher conferences
- Sending the questionnaire home with report cards or permission slips
- Educating students and parents on who is eligible for support and services
- Developing a process to follow up with students and families who do not return the questionnaire when there is an indicator they may be experiencing homelessness

Because no single strategy alone can be perfected to identify all homeless students, districts should also address gaps in their other primary strategies to increase identification.

Make information about rights and services more accessible by posting it in prominent locations and in a variety of formats

School districts post and distribute information about the rights of homeless students and whom to contact for help, but some students and families said they found it hard to find and understand this information. Several factors explain this difficulty: survey results indicate more than a quarter of school districts do not disseminate information in places homeless families visit, such as shelters, food banks and libraries. Similarly, close to a quarter of school districts did not indicate that they post information on their websites, or in languages spoken by families in the district. Homeless liaisons also do not always speak the same languages as families, making it harder for students to build a trusting relationship and open up about their situation.

Further, some students and families said that the materials available often use terms that are difficult to understand. For example, flyers and information posted on websites and school grounds often use “McKinney-Vento” as a term for “homelessness.” This is a term people with knowledge of the law might understand, but it is not understood by many of those to whom it applies.

In either case, outreach materials that do not actually reach or cannot be understood by the intended audience reduce the likelihood districts will identify the homeless students they wish to find.

Possible solutions include:

- Publish informational materials in languages spoken by students and families in the district. Posters and brochures are available in multiple languages from OSPI for free.
- Use simple terms students and families can understand
- Publish and distribute information in formats accessible for all students, including those with disabilities
- Post and distribute information in places homeless families are likely to frequent, including shelters, food banks, libraries, post offices, and public transit
- Make use of the school’s website and social media, such as Instagram, Facebook and Twitter, to reach families with internet access

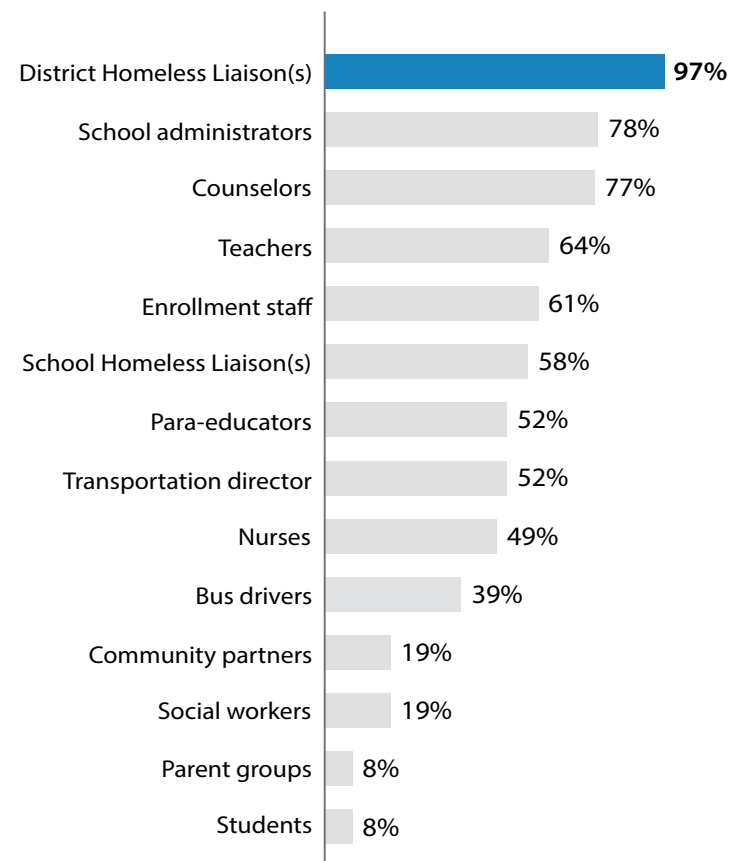
Expand training on homelessness beyond the liaison to include all staff who have regular, close interactions with students

School district leadership rely on people who work closely with students to identify students who are experiencing homelessness and whom the housing questionnaire does not capture. While almost all ensure the district homeless liaison is trained on how to identify and approach these students, survey results indicate that the percentage of other school staff receiving this training is much lower. As shown in Exhibit 11, 64 percent of school districts provide training to teachers, less than 60 percent provide training to the school building-level homeless liaison and para-educators, and less than half provide training to nurses or bus drivers.

Districts are responsible for training school staff on how to identify and support homeless students. However, some districts’ homeless liaisons said they do not have the time to train key staff in every school building.

District homeless liaisons can use webinars and other resources OSPI provides to train school staff. Training should be prioritized for staff who work with students on a day to day basis, including teachers, para-educators,

Exhibit 11 – Percentage of school districts providing training to specific staff members or groups



Source: Auditor analysis of statewide school district survey.

building-level liaisons, counselors, cafeteria workers, bus drivers, enrollment staff, and coaches. School staff can help identify homeless students when they understand the signs of homelessness, the rights of these students, and how to approach students so they feel comfortable disclosing their situation.

Students and families interviewed provided insights that districts could incorporate in their training. Some said they feel valued when adults in school create a welcoming environment and project an attitude of caring. This includes asking students how they are doing and working with them as individuals. An overall welcoming atmosphere makes it more likely that students and families will be comfortable self-identifying.

Students and families also highlighted signs of homelessness that adults in schools should be attuned to. These include declining grades, truancy, changing moods, persistent tiredness, clothes smelling or appearing dirty, and students mentioning they are crashing at a friend's place or getting into fights with family often.

Districts could better use student data to identify students who might be experiencing homelessness

The National Center for Homeless Education recommends screening student data for indicators of homelessness to increase identification. These indicators include poor attendance, missed course work, service usage related to homelessness, and requests for enrollment and transportation changes. Less than half of school districts surveyed said they screen student data for signs of homelessness.

School districts could increase identification by reviewing student:

- Attendance, behavior, and missed coursework data for signs of homelessness, including absences, acting out, and not turning in assignments
- Requests for address and transportation changes such as use of businesses or P.O. box addresses, or asking to be dropped off at shelters, food banks or churches
- Enrollment forms for service usage related to homelessness such as Title I and free and reduced-price meals

Using the strategies described in this section can help school districts address gaps in their approaches to identifying homeless students.

Changes in policies and practices in enrollment and academic flexibility can help school districts better support homeless students

Schools are required to immediately enroll homeless students because delays can cause further disruption to their education and well-being. One-third of the districts interviewed told us they do not fully enroll students until they have essential records from the previous school. School districts can help ensure immediate enrollment of homeless students by training staff on legal requirements, provisionally placing students in class, and clarifying records transfer policies.

Moreover, because of the disruptions homelessness inflicts on learning, homeless students often need more flexibility than other students to do well in school. Offering more flexibility with assignments can help homeless students complete schoolwork, which is essential for learning and on-time graduation. Districts should also offer homeless students alternative opportunities to earn credit, as required by law.

Schools are required to immediately enroll homeless students because delays can cause further disruption to their education and well-being

Federal law states schools must immediately enroll homeless students, even without records from previous schools

To ensure homeless students have equal access to the same free, appropriate public education as other students, the McKinney-Vento Act requires that schools enroll them in class immediately. This requirement applies even if the student is unable to produce records normally required for enrollment, such as school records, health immunizations, proof of residency or guardianship, and birth certificates. Based on this law, to be considered “enrolled,” a student must not only be included in a school’s roster, but must also be attending classes and participating fully in school activities. Other key student enrollment provisions of this law include requirements that schools:

- Ensure the prompt transfer of student records between the previous and the enrolling school
- Eliminate enrollment delays caused by schools’ requirements regarding students’ school records, health immunization, proof of residency, birth certificates, or other documentation

- Develop, review, and revise laws, policies, and practices that pose barriers for student enrollment and retention, including those caused by fees, fines, or absences

While the McKinney-Vento Act is silent on the definition of “immediate,” the National Law Center on Homelessness and Poverty and the National Association for the Education of Homeless Children and Youth have interpreted the term “immediate” to mean attending classes and participating fully in school activities the same or following day.

Enrollment delays can further affect the education and well-being of homeless students

Preventing enrollment delays is essential to the academic success and well-being of homeless students. Delays can cause these students to fall behind academically due to missed classes, which reduces the likelihood they will graduate from high school. Further, if homeless students are not in school, they do not receive the free breakfast and lunch schools serve to low-income students. In-school meals may be a homeless student’s main or only source for a balanced, healthy meal. Finally, school is sometimes the safest environment for homeless students. More time in school means less time on the street, in a shelter, or in unsafe environments.

School enrollment can offer these students a supportive environment, which includes adult guidance, academic assistance, peer interactions, regular meals and help in accessing other services they need.

One-third of the districts interviewed told us they do not fully enroll students until they have essential records from the previous school

Out of 21 school districts interviewed, seven said they delay placing students in classes until they receive essential records from the previous school. Enrollment delays ranged from two days to more than a week. Typical records for which these districts delayed student class placement include students’ individualized education programs and safety plans. School districts design individualized education programs for students with specialized learning needs. School districts put safety plans in place to manage students with behavioral histories who could pose a threat to other students or staff.

Several factors explain why districts delay immediate enrollment:

- **Districts think student records are necessary to better serve and protect students.** District staff consider school transcripts necessary to determine proper class placement. Districts also find that knowledge of information in

students' individualized education programs and safety plans is essential to provide students an adequate learning environment and to protect the safety of other students.

- **School staff do not always know the enrollment rights and records transfer rules applicable to homeless students.** District liaisons noted that sometimes staff at the previous school do not release records because they do not know the law requires immediate release of records, even if the student owes fees or fines, or was not identified as homeless before leaving the district. Insufficient training might explain this lack of awareness. Survey results indicate nearly 40 percent of districts do not train enrollment staff on the rights of students experiencing homelessness.
- **Districts might lack clear policies that permit staff to release records when homeless students owe fees or fines.** District staff said that schools hold records needed for enrollment when students owe fees and fines in their prior district. Fees and fines can range from as low as \$15 to as high as \$300 for lost textbooks or laptop computers.

Insufficient and conflicting policies might explain why districts hold student records because of fees and fines. Survey results indicate that nearly 40 percent of districts do not review their policies and practices to remove barriers to enrollment for homeless students. Additionally, the policy issued by the Washington State School Directors' Association (WSSDA) concerning general student records transfer does not align with its model policy for homeless students, creating confusion for school districts. WSSDA's general records transfer policy directs school districts to recover fees and fines a student owes before releasing records, and makes no exception for homeless students. However, WSSDA's model policy concerning homeless students recommends that districts waive fees and fines for homeless students and enroll them without delay.

School districts can help ensure immediate enrollment of homeless students by training staff on legal requirements, provisionally placing students in class, and clarifying records transfer policies

While districts have valid needs regarding student records, delaying the immediate enrollment of homeless students is against federal law and places students at risk for academic failure. The audit identified three possible solutions that school districts can pursue to help return homeless students to the classroom more quickly.

Train enrollment staff on the rules that apply to homeless students and their records

To help ensure the immediate school enrollment of homeless students, the National Center for Homeless Education recommends that districts train enrollment staff on the enrollment rights of these students. To increase awareness and compliance with school enrollment requirements, districts that are not training enrollment staff should do so. By expanding training, districts can reduce the risk that staff will hold student records when students owe fees or fines. An additional benefit of training enrollment staff is that they can ensure arriving students are placed in a classroom right away, even without records.

Provisionally place students in class while waiting for records

Districts can provisionally place students in class by using one of many methods to temporarily determine class placement. Schools can make adjustments as needed once they receive official records. The National Center for Homeless Education and district staff interviewed offered several strategies to place a student promptly in the classroom while waiting for records:

- **Talk to the parent or student to obtain information directly from them.** Schools can ask families what classes the student has or has not taken in the previous school, how well the student performed in specific classes, if the student has an individualized education program or safety plan, and the needs the plan was designed to address.
- **Accept unofficial records directly from students and families.** Schools can ask for and accept copies of unofficial transcripts from students and families to see what courses the student has completed and their grades.
- **Access student information in OSPI's CEDARS system.** Schools can access certain student information in OSPI's CEDARS, a system school districts use to report information to the state through the Student Records Exchange. This system contains students' coursework completed, grades earned and assessment scores. While the system does not include the specific details of individualized education program or safety plans, it does indicate if a student has individualized education or behavioral records.
- **Use the student's age and school curriculum to determine class placement.** Schools can use the age of the student to help determine what grade they should place students in. For example, some districts interviewed said that if a child is 10 years old, they would place that child in 4th grade; if the child is 16 years old, they would place her or him as a high school sophomore. Schools can also conduct brief educational student assessments based on the school's curriculum and use such assessment to determine what grade the student should be placed in and if the student might have an individualized education program or safety plan.

CEDARS stands for OSPI's Comprehensive Education Data and Research System. It is a longitudinal warehouse of education data reported by Washington school districts.

Clarify records transfer policies and procedures

School districts and WSSDA can both make policy changes to student records transfer policies to help prevent delays in enrollment for homeless students:

- Districts can review their enrollment policies to ensure they clearly indicate that the normal rules governing transfer of records and money owed do not apply to homeless students.
- Districts can require enrollment staff to immediately send all student behavioral records to the enrolling district, including individualized education programs and safety plans, while they sort out disputes over other records needed for enrollment.
- WSSDA can revise its general student records transfer policy to align it with its homeless students policy. This alignment can help ensure both policies clearly direct districts to immediately transfer records needed for enrollment of homeless students, even if the student owes fees and fines.

Because of the disruptions homelessness inflicts on learning, homeless students often need more flexibility than other students to do well in school

To help homeless students succeed, schools should acknowledge and accommodate many of the disruptions homelessness inflicts on learning. These students might live in conditions that lack quiet spaces for concentration and computers to complete assignments, or spend long hours commuting to and from school with little time to do homework. They also have difficulties accruing credit needed for graduation as they move around when affordable apartments or shelter space becomes available, or when they leave one friend's house for another.

These students might have only partially completed coursework, have difficulty turning assignments in, or have credits that do not line up with their new school's graduation requirements. School districts need to find ways to give homeless students more flexibility in schoolwork and accruing credit needed for graduation.

Offering more flexibility with assignments can help homeless students complete schoolwork, which is essential for learning and on-time graduation

Teachers need to know when students are experiencing homelessness to provide them the flexibility they need to succeed

Homeless families said it was important for teachers to know their situation so they can provide students the flexibility they need to do well in school. As already mentioned, homeless students often live in conditions that affect their ability to complete schoolwork. When teachers do not know a student's housing situation, they might not understand why a student is struggling in completing assignments and would be less likely to make homework modifications to help the student. Some families thought that teachers would be more understanding, more supportive and more flexible about homework if they were aware of the students' housing situation. Teachers who knew one student's situation, for example, were described as being very kind and flexible with assignments. Another family said that, once made aware of the situation, their child's teacher started to ask how the student was doing and provided extra time for the student to settle in the classroom.

Students and families said that it was difficult to obtain flexibility from teachers because the teachers generally do not know when a student is homeless. District staff said they do not share a student's housing situation with teachers due to confidentiality concerns. OSPI generally advises school districts to only disclose a student's homeless status to teachers on a case-by-case basis.

Districts could develop formal policies and implement strategies to inform teachers of students' homelessness with the goal of offering students flexibility

Some districts have developed ways to privately share a student's housing situation with staff when needed to help the student. For example, one district places a heart-shaped icon in a student's record in the school's information system to denote homelessness, viewable only by the student's teachers and administrators. In some smaller districts with few students, homeless liaisons said they have a conversation with the student's teachers individually to communicate the student's situation and discuss ways to make their schoolwork more manageable.

Districts should ensure guidelines specify instances where it would not be appropriate to share this information, such as when a student or family does

not want their situation disclosed to teachers. In the event that students are not comfortable sharing information, guidelines should provide strategies for liaisons to advocate for flexibility without revealing the student’s housing situation.

Districts could also establish formal policies to authorize and guide teachers in giving homeless students greater flexibility

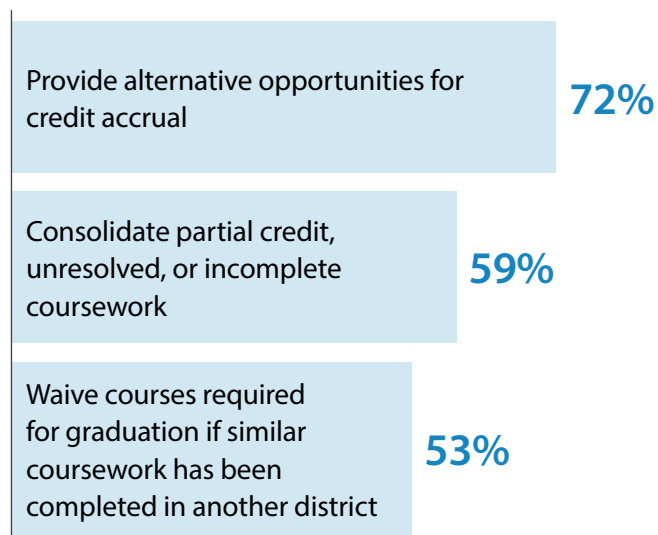
Many districts interviewed said they do not have a formal policy to authorize and guide teachers in offering homeless students flexibility with assignments. District staff said teachers may offer such support only informally and on a case-by-case basis, when the district liaison notices the student is struggling and reaches out to teachers to ask for support. Districts could develop policies that allow and guide teachers to give homeless students greater flexibility, including:

- Modifying assignment requirements. If completing an assignment would ordinarily require the use of a computer, adjust the assignment so students can complete it without one.
- Extending deadlines to grant students extra time to turn in the assignments
- Finding time during school hours for the student to do homework

Districts should also offer homeless students alternative opportunities to earn credit, as required by law

State law requires school districts to create alternative opportunities for credit accrual, waive courses required for graduation if the student has completed similar coursework elsewhere, and consolidate partial credit, unresolved, or incomplete coursework for homeless students. While almost three quarters of districts indicated they address alternative means of credit accrual, the percentage of districts offering to consolidate partial credit and incomplete coursework is lower (59 percent), and those offering to waive courses is lower still (53 percent), as shown in Exhibit 12.

Exhibit 12 – Percentage of school districts providing specific academic support for homeless students



Source: Auditor analysis of statewide school district survey.

An underlying reason for this gap might be that school districts do not take the time to assess the academic barriers for homeless students and to minimize them. Survey results indicate that nearly half of school districts do not regularly review academic policies and procedures to ensure they do not disproportionately penalize students experiencing homelessness. Additionally, district staff said they need guidance from OSPI on calculating credits for partial, unresolved and incomplete coursework.

By reviewing and revising their policies and practices, districts can do more to give homeless students credit accrual opportunities required by state law. Districts could also replicate models that leading practices suggest and that some districts have implemented to provide students additional opportunities to earn credit. These include creating independent or work-study programs to help students who are missing credit to graduate on time and offering some classes online. To facilitate online classes for students who lack internet access, some districts loan laptops to students while others purchase Wi-Fi codes that students can use to access the internet on their phones.

Parental involvement can help districts and families make school placement decisions based on what is best for homeless students' academic success

Federal law requires school districts to use student-centered factors when determining school placement for homeless students. Homeless students often face difficult trade-offs between changing schools and long commutes, both of which can affect their education. Districts can educate families to help them weigh whether it is more beneficial for the student to change schools or maintain a long commute. Districts can also achieve additional benefits by involving families in the development of students' transportation plans.

Federal law requires school districts to use student-centered factors when determining school placement for homeless students

To promote educational stability, the McKinney-Vento Act gives homeless students the right to stay in the school they attended prior to experiencing homelessness, unless it is not in the student's best interest or contrary to the student or family's request. Best interest determinations should be made based on what is best for the student's academic success. The National Association for the Education of Homeless Children and Youth and the National Law Center for Homelessness and Poverty recommend that districts consider factors such as those listed below in making best interest determinations:

- The impact the commute may have on the student's education
- The age of the child or youth
- The school placement of siblings
- Personal safety issues
- The student's need for special instruction
- Length of anticipated stay in temporary shelter or other temporary location
- Time remaining in the school year

There may be other factors that can help districts and families make determinations based on what is best for the student's academic success. However, the cost of transportation to the district should not be a factor, because it is not a matter of the student's best interest.

Homeless students often face difficult trade-offs between changing schools and long commutes, both of which can affect their education

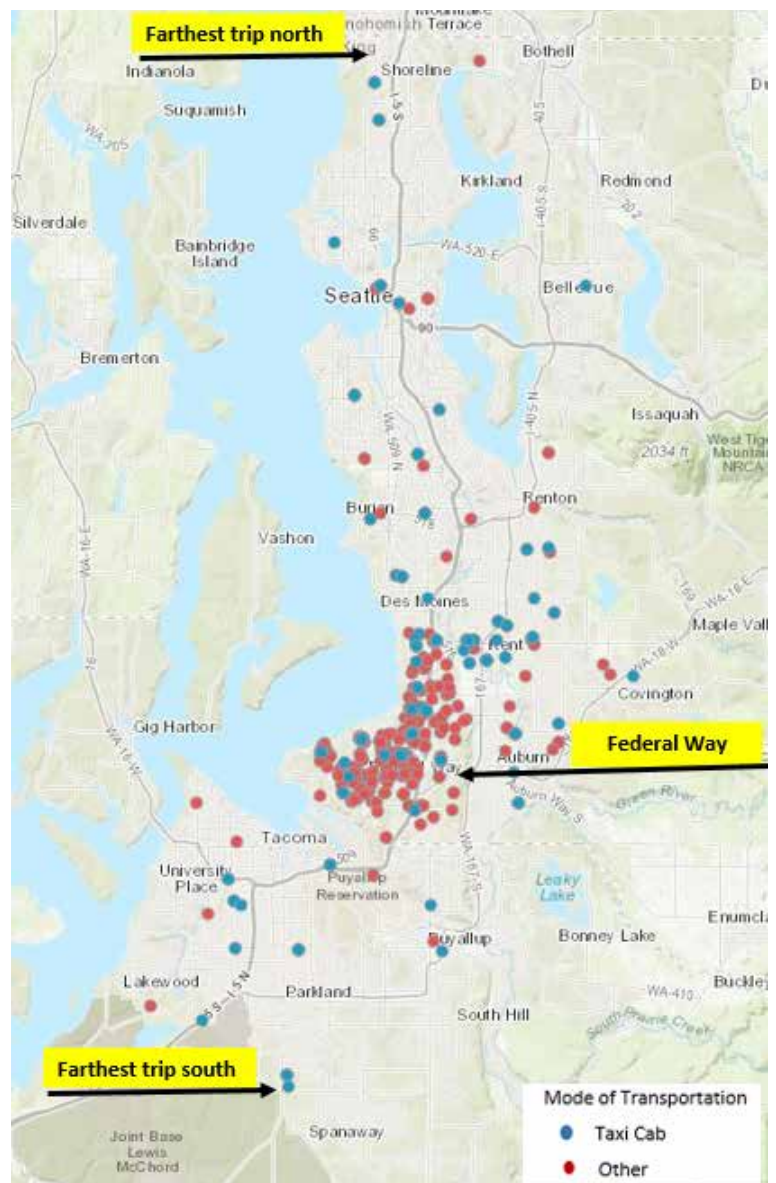
Homeless students and their families often have to decide between staying in the school they attended before relocating to a new district to maintain continuity or enrolling in the new district school to avoid long commutes. This decision presents tradeoffs that affect students' education.

Staying in the same school helps students stay on track with credit needed for graduation. Additionally, this continuity allows students to maintain relationships with teachers and peers at this critical point in their lives.

Despite the benefits of staying in the same school, some families might find that the travel involved has a negative effect on students' education. District staff described student commutes as long as two hours daily. Some families said that long commutes contribute to late school arrivals, school absences, hunger, sleep deprivation and insufficient time to do school work. For example, some families report that homeless students in their area board the school bus at 6:45 a.m. and return home at dinnertime, a schedule that greatly reduced the time available for schoolwork and for sleep. Despite leaving home early, students with long commutes often arrive at school too late for breakfast and must wait until lunch time to eat or risk punishment for eating in class.

The map in Exhibit 13 illustrates the lengthy commutes faced by homeless students in the Federal Way school district. The map shows trips the district provides to homeless students within and outside district boundaries, in taxi cabs and other modes of transportation. The longest includes trips to and from north of Shoreline or south of Lakewood through rush-hour traffic, which can exceed an hour each way.

Exhibit 13 – Transporting homeless students outside district boundaries in Federal Way Public Schools



Source: Federal Way Public Schools.

Districts can educate families to help them weigh whether it is more beneficial for the student to change schools or maintain a long commute

The National Center for Homeless Education recommends parental involvement to ensure student transportation decisions are based on what is most beneficial for the student's education. District staff interviewed said they do not always have a conversation with families to provide information that would help families make school placement decisions that are best for the student's academic success. Districts could educate families to help them weigh the effect of school mobility, long commutes, and other factors on the student's education. Parental involvement can help reduce the educational impact of the decision for the student. Districts must walk a fine line between providing sufficient information and appearing to pressure families into a decision. The goal is to ensure final decisions about the student's school placement reflect what is best for the student's academic success. Additionally, decisions about whether the student will continue at their current school or change schools should be made prior to the development of the student's transportation plans.

School districts can achieve additional benefits by involving families in the development of students' transportation plans

Survey results indicate about one-third of school districts do not involve parents in the development of student transportation plans. Parental involvement can provide districts a venue to communicate their expectations about the parents' role in carrying out the plan and share key information such as student pick-up and drop-off times and locations. They can also ensure parents understand how and when to inform the school of future changes to the family's situation.

Districts can address some of the financial implications of transporting homeless students across district boundaries through the use of cost-saving strategies

Many homeless students need to be transported outside of district boundaries, which can be costly for school districts. The state student transportation funding model compounds the financial effects of transporting students out-of-district because it does not fully reimburse about half the districts. School districts have several options to help reduce student transportation costs:

- Claim reimbursement for all eligible student transportation costs, regardless of the mode of transportation
- Establish formal inter-district transportation agreements to share responsibilities and costs
- Use other alternatives, including providing public transit passes, gas cards, or mileage reimbursements to families

Many homeless students need to be transported from outside the district's boundaries, which can be costly for school districts

The farther a school district must transport homeless students outside district boundaries, the greater the expense in driver hours, vehicle wear and fuel costs. Districts we spoke with said the state lacks enough bus drivers, which has prompted some districts to use expensive alternatives, such as contracted taxi services. Districts reported that in the most recent school year, they spent more than \$15 million to transport these students. This figure, however, underestimates the cost because it represents responses from only 125 school districts. The number of students districts transport outside the district boundaries varies significantly. Some transport only a few students, while others reported transporting more than 100 students.

The state student transportation funding model compounds the financial effect of transporting students out-of-district because it does not fully reimburse about half the districts

State law expresses the goal that student transportation to and from school should be funded by the state at 100 percent or as close as reasonably possible. However, state law requires OSPI to calculate the amount of funding each district will receive

by using a statistical model that leaves half the districts in the state less than fully funded for their student transportation costs. That model estimates what a school district would be expected to spend based on several district-specific factors, including the land area of the district, the number of stops, and the average trip distance. School districts then receive either the expected transportation expenditures estimated by the model or their actual expenditures from the prior year, whichever is less. The effect on districts varies. Some are reimbursed for nearly 100 percent of their costs, while others receive state reimbursement for as little as 60 percent of their costs. OSPI is aware of these funding challenges and has hired a consultant to address the gap created by the funding model, as required by proviso.

School districts have several options to help reduce student transportation costs

Claim reimbursement for all eligible student transportation costs, regardless of the mode of transportation

Districts use various modes to transport homeless students who do not live on regular school bus routes, including contracted transportation services such as taxis, mileage reimbursements and gas cards for parents who drive their children to school. District staff told us that they thought such modes were ineligible for state reimbursement and that they could only claim reimbursement from state student transportation funding if the student was on a school bus. As a result, districts did not claim reimbursement for all eligible student transportation costs and financed these expenses with other funds.

According to OSPI transportation office staff, school districts should claim any student trip for reimbursement regardless of mode of transportation as long as it is between school and the student's residence. To claim reimbursement for eligible transportation costs, expenses should be accounted for in Program 99. Staff said that school districts have had a difficult time understanding what is reimbursable partly because the right district staff might not attend training and partly because other OSPI departments supply inconsistent advice. OSPI transportation staff said they are working on improvements to ensure school districts receive accurate and consistent information.

School districts need to ensure the right staff, including transportation directors, business managers and homeless liaisons, attend transportation trainings. Additionally, homeless liaisons should direct transportation reimbursement questions to the OSPI transportation department instead of OSPI's homeless education office so that they receive accurate reimbursement information.

Establish formal inter-district transportation agreements to share responsibilities and costs

Federal law requires school districts to share responsibility and costs for transporting homeless students who are enrolled in a district other than where they currently live. A key strategy for facilitating shared responsibilities and costs involves establishing formal inter-district transportation agreements between the district in which the student is enrolled and the district in which the student currently lives. About half of school districts surveyed have established inter-district transportation agreements that lay out how the two districts will coordinate to transport students and share costs. Some of the districts that have not established agreements said they either cannot agree on a cost-sharing method with other districts or do not think the agreement would benefit them.

Disputes over the mode of transportation and how to equitably share a student's transportation costs can prevent districts from reaching a formal cost-sharing agreement. The latter might result in one district bearing significantly greater responsibility and costs. This imbalance is especially problematic for those districts that are not fully funded by the state for their student transportation costs or have fewer financial resources. If two districts cannot reach agreement on a cost-sharing agreement, they might simply follow federal law and spread costs equally between them. They can also seek assistance from OSPI to reach an equitable agreement.

Other alternatives include providing public transit passes, gas cards or mileage reimbursements to families

More than three-quarters of school districts surveyed said that they provide transit passes or gas cards, or reimburse parents or youth who are able and willing to drive to school or take public transportation. While these options might not work in every case, especially for families that do not have a vehicle, have jobs with schedules that conflict with school schedules, or live in communities where there is little public transit, they could be a cost-effective and safe alternative. These approaches can complement a district's other transportation modes, because they can help reduce the expense involved in transporting homeless students. That said, districts must be careful to present these as alternatives and not as the only option to prevent placing an extra burden on the student or parent.

School districts could better connect homeless students to community services through improved partnerships with Coordinated Entry agencies and other resources

Federal law requires school districts to connect homeless students with community resources to address needs that extend beyond services districts typically provide. The most important step districts can take in connecting students with community resources is to partner with their counties' Coordinated Entry agencies. Improved partnerships and referrals can help districts better connect homeless students to other resources. Some school districts have taken extraordinary steps to further increase homeless students' access to services.

Federal law requires school districts to connect homeless students with community resources to address needs that extend beyond services districts typically provide

Homeless students often lack stable housing, food, and mental health and medical care. While access to these basics is critical to students' well-being and academic success, districts are neither required nor expected to directly provide these and other non-academic services to homeless students. However, schools are well-positioned to help students access these resources because of their familiarity with students' needs and connections to the communities they serve. The McKinney-Vento Act requires districts to identify organizations in the community that provide these services, develop partnerships with them, and provide referrals for homeless students who need them.

The most important step districts can take in connecting students with community resources is to partner with their counties' Coordinated Entry agencies

One of the first places a district can turn to help students access housing and other community services is its nearest Coordinated Entry (CE) program. CE programs, which are operated by community service providers, offer people experiencing homelessness a systematic intake, assessment, and referral process to housing and other services the individual needs. CE programs prioritize assistance for people who live unsheltered, because they have limited resources and consider these individuals to have the greatest needs. Every county in Washington is served by at least one CE program.

Although CE programs can help some students access needed services, survey results indicate districts significantly under-use this resource. Seventy two percent of districts indicated they were not aware of or in contact with their CE programs. Additionally, less than 20 percent of districts said that they have a referral protocol to refer students to CE programs or attend CE meetings, both key strategies the National Center for Homeless Education recommends for building partnerships with CE programs.

Districts should establish partnerships with their CE programs to help those students who qualify for the assistance this program offers access services (see the sidebar for a link to Commerce's website, which offers a list of local CE offices). Spokane School District is an example of a district that has established partnerships with its CE program to support homeless students. The district and the CE program developed the Homeless Families Coordinated Assessment process to connect families with school-age children with school supports, housing and other services they need. District homeless liaisons attend weekly CE program meetings to ensure the immediate enrollment and provision of school supports for families and youth. On days when district liaisons cannot attend meetings, CE intake personnel refer families with school-age children to the district liaison to ensure they get connected with school services.

While CE programs are a resource districts should use, these programs do not currently provide help to the vast majority of homeless students who live in double-up situations. Our audit shows homelessness affects the well-being and education of double-up students similarly to students living unsheltered or in other living arrangements. Because of the profound effect of homelessness, it is important that districts also establish partnerships with other community resources that can help students not currently served by CE programs.

The term "unsheltered" includes people who live in:

- Camping grounds and parks
- Cars, or bus or train stations
- Abandoned buildings
- Public or private places not designed for or ordinarily used as a regular sleeping accommodation for people

Source: U.S. Department of Housing and Urban Development

Districts can find the Coordinated Entry program serving their area on Commerce's website at:

www.commerce.wa.gov/serving-communities/homelessness/

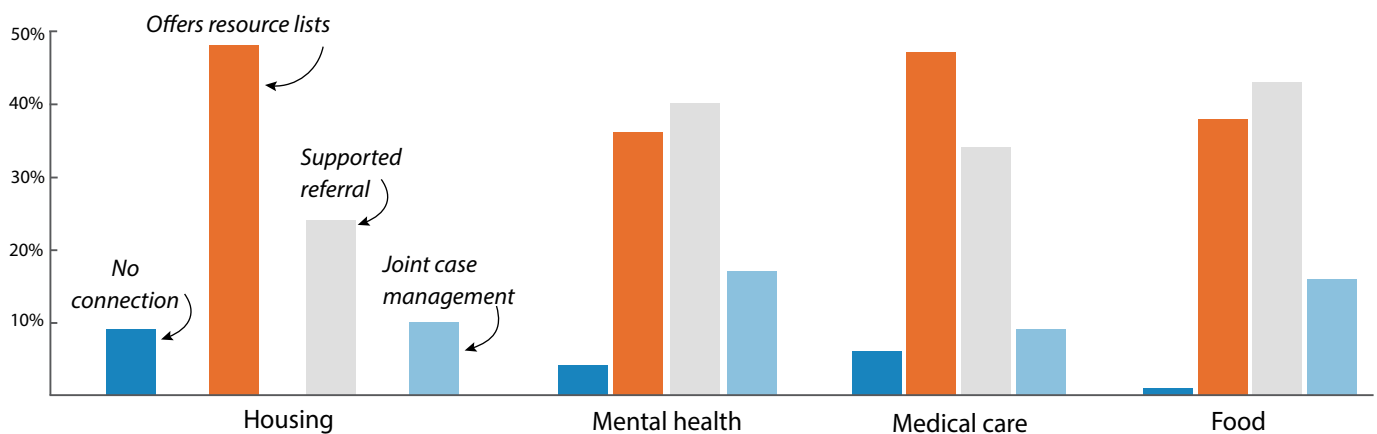
Improved partnerships and referrals can help school districts better connect homeless students to community resources Coordinated Entry does not provide

School districts varied in how much support they provide in connecting homeless students to other community resources. The survey asked all districts to choose which of four levels of support they provide to help connect homeless students to services. The four choices were:

- No connection – Does not provide support to connect students to services
- Resource lists – Provides student with list of contacts for community service providers
- Supported referral – District has an understanding of locally available services and developed at least some basic partnerships that allow them to help students access services they need
- Joint case management – District has formed deep partnerships with local service providers; might have onsite services, such as contracted mental health support, a clothing bank, or food pantries; and might be willing and able to transport students to appointments outside school

Exhibit 14 shows the four levels of support districts said they provided on the four key needs: housing, food, mental health care and medical care.

Exhibit 14 – School districts vary in the level of support they provide to connect students to services
Percent of surveyed districts describing the level of each type of support offered



Source: Auditor analysis of statewide school district survey.

Less than 10 percent of districts surveyed said they do not provide any type of support that would help homeless students find and access community providers that address housing, food, mental health care or medical care. These were mostly small school districts in rural communities and districts that do not receive McKinney-Vento or HSSP funding to assist students experiencing homelessness.

About half of districts surveyed said they provide students with a list of community resources. The resource list typically includes the name of service provider, type of service the provider offers and a phone number or website to contact the provider.

Many school districts have established partnerships with service providers in the community to connect students to services. For example, more than half of districts surveyed partner with food banks to host backpack programs, which provide weekend meals for students in need.

Some districts go above and beyond by offering students community services directly on school campuses. For example, five school districts interviewed have family resource centers located on campus, where school staff help students complete applications for Medicaid and food assistance, and call or meet with organizations directly to connect students to services. Five of the school districts interviewed also said they take students who lack transportation to appointments with services providers in the community. Districts that are larger, located in urban areas, or receive McKinney-Vento or HSSP funding were more likely to provide this level of support to students experiencing homelessness.

Resource lists and basic partnerships with local service providers can help districts improve connections to community services for homeless students

Survey results, interviews, and literature on leading practices revealed ways school districts can better connect homeless students to services.

Create a list of available community resources to share information with students and families. More than one-third of districts surveyed said they do not maintain a list of available community resources. School districts that are small or in rural areas were less likely to have a resource list. Resource lists are a common tool used to direct students and families toward service providers in the community who can help meet their needs.

Districts can develop a basic contact list using a variety of methods to identify service providers, such as online searches and attending meetings with community agencies. One way to create such a list is by reaching out to local community resource centers: They are very likely to have already established lists that schools can use to begin their own resource lists.

Improve existing resource lists and build basic partnerships to help students access services. Districts that already have resource lists should ensure they are updated regularly so that students and families receive accurate information.

School districts that want to progress beyond handing out a current contact list need to learn what their local service organizations can do to help their homeless students, and then take steps to develop partnerships and provide referrals. Several such organizations suggested that key school staff, including the homeless liaison and school administrators, attend meetings they hold in the community to learn about locally available resources and the best ways to connect students to these services. While building partnerships requires time and effort, school districts and community organizations that have made the effort reported it was well worth the investment.

Some school districts have taken extraordinary steps to further increase homeless students' access to services

Some school districts have gone above and beyond what federal law requires to help students access services. These districts have used dedicated funding strategically and developed extensive partnerships with government and community agencies to expand student access to housing, medical care and mental health services. Examples of these efforts include:

Provide medical consent to help unaccompanied youth access medical services

– About 60 percent of school districts have taken advantage of a state law that allows school districts' homeless liaisons, school nurses and school counselors to authorize consent for an unaccompanied youth to receive non emergency medical care, such as physical examinations and immunizations. OSPI developed a sample form districts can use if they wish to provide medical consent for unaccompanied homeless youth.

Develop contracts to provide scarce services in mental health care – School district staff and families interviewed said more mental health support is needed to help students deal with the emotional distress of homelessness. Some districts said they have established contracts with mental health providers to provide this support to students either directly on campus or at the provider's facility.

Develop close relationships with local housing programs, non-profit organizations, and consider adding specialized district-level staff such as housing case managers

– Several school districts told us about innovative programs they have developed to help students find housing.

- **Use HSSP grant funding to hire a housing case manager** – A housing case manager is typically an employee of a local or nonprofit agency who works at the school district to identify the needs of each homeless student and their family. Once needs are identified, the housing case manager refers the family to Coordinated Entry. Examples of districts that have used their HSSP grant from Commerce to hire housing case managers include Bellingham Public Schools and Evergreen Public Schools in Clark County.
- **Partner with their local housing authority and nonprofit organizations to develop housing assistance programs** – Housing assistance programs offer a short-term rental subsidy and case management to provide supportive services to students in the area their district is located. For example, Tacoma Public Schools has partnered with the Tacoma Housing Authority to provide housing assistance to homeless students with the goal of reducing school mobility.
- **Establish a partnership host home program to help unaccompanied youth** – Host home programs help unaccompanied homeless students find a supportive family to live with while they finish school. Host home programs are established by local nonprofit organizations in response to the lack of shelters or other housing options for unaccompanied homeless youth. For example, Shelton School District has partnered with the Mason County Host Program to help homeless youth (see sidebar, below).

The Mason County Host Program helps homeless youth find supportive housing

The Mason County Host program is a community-based housing match program that offers support to homeless youth in pursuing educational goals while creating supportive transitional housing opportunities. Program participants receive:

- Assistance locating a home
- Mentoring from staff (executive director, case manager, volunteers)
- Stipend support
- Educational supports (tutoring and college planning)
- Independent living skills training
- Financial management training
- Life planning
- Systemic support and advocacy

For more information about the Mason County Host Program, visit its website: www.mason-co-host.org

OSPI and WSSDA could increase support for school districts through additional guidance, training and resources

OSPI and WSSDA play supportive roles in helping school districts address student homelessness statewide. OSPI supports district efforts to assist homeless students by providing funding, guidance, training, and resources. WSSDA supports districts through model policies and procedures. OSPI and WSSDA can address some school districts' needs by providing additional guidance, especially on best practices and interpretations of the law. OSPI could also expand its training delivery and content to address districts' needs. Finally, OSPI could consider facilitating an online forum for homeless liaisons to share information statewide, similar to what other states have implemented.

OSPI and WSSDA play supportive roles in helping school districts address student homelessness statewide

OSPI supports district efforts to assist homeless students by providing funding, guidance, training and resources

OSPI does not provide services directly to homeless students, but the agency supports districts in their efforts to identify and assist these students. As mentioned on page 17 of this report, OSPI provides financial assistance to districts through the federal McKinney-Vento program and the state Homeless Student Stability Program. OSPI's Homeless Education Program provides training, guidance and resources to help district homeless liaisons identify and provide homeless students the services they need to succeed. Additionally, the program monitors districts for compliance with federal requirements on student homelessness.

WSSDA supports districts through model policies and procedures

WSSDA develops model policies and procedures to help school districts meet legal requirements that benefit students. WSSDA has developed a model policy and procedure to help school districts comply with federal requirements regarding the enrollment rights and services for students experiencing homelessness. While districts can and do develop their own policies, school boards typically adopt

WSSDA's policies as their own because they promise districts minimum legal compliance. More than 70 percent of school districts surveyed said they have adopted WSSDA's model policy on student homelessness as their own.

OSPI and WSSDA can address some school districts' needs by providing additional guidance, especially on best practices and interpretations of the law

School districts said they need more guidance in the areas below to better identify and serve homeless students. OSPI and WSSDA could collaborate to determine what would be the most effective means to provide this guidance. Some of this guidance might be more suitable for training, which is OSPI's role, while others might be more appropriate to include in a model policy or procedure, which is WSSDA's role.

- **Determining student eligibility for services.** Districts noted that determining which students qualify as homeless in the double-up category and the length of time they can qualify can be challenging in some situations. Cases where districts wanted more guidance include when students move-in with grandparents or other family members, initially on a temporary basis, but then continue to stay with them long-term.
- **Using school building-level homeless liaisons.** As mentioned on page 10, state law requires districts with more than 10 unaccompanied homeless youth to designate a building-level homeless liaison at each middle and high school. District staff said they would like guidance from OSPI on how to best use these staff to identify and assist homeless students.
- **Calculating credit for partial, incomplete or unresolved coursework.** As discussed on page 33, state law requires districts to consolidate student credit for partial, incomplete, or unresolved coursework, but many districts are not doing so. A reason why districts are not consolidating credit is because they need guidance to do this. State law requires OSPI to develop a standard way for districts to calculate and award credits in a consistent manner, but OSPI has not finished developing this guidance. Completing this guidance can help districts award credit to homeless students and consequently help them graduate on time.
- **Establishing inter-district transportation agreements.** District staff noted that sometimes it is difficult to establish transportation agreements with other districts because they struggle to agree on a cost-sharing method or mode of transportation. Staff would like guidance and assistance in developing and facilitating these agreements.

- **Factors to consider to help families make student transportation decisions.** As discussed on page 36, homeless students often face difficult transportation trade-offs that might affect their education. District staff would like more guidance from OSPI on key factors parents should consider to make transportation decisions that are best for students' academic success.
- **Clarifying reimbursable modes of transportation.** As discussed on page 39, district staff expressed confusion regarding what modes of student transportation are reimbursable by the state and how to claim reimbursement for these expenses. Conflicting information from OSPI partially contributed to this confusion. Consistent training and guidance from OSPI can help improve districts' understanding.
- **Providing consent for unaccompanied homeless youth.** These students often need consent for many activities other than medical care, including school field trips, sports, and other extracurricular activities. To help these students participate fully in school activities, district staff would like guidance on the types of activities they can provide consent for and how to provide such consent.
- **How to develop resource lists and establish partnerships with service providers.** District staff, particularly in small districts with few resources, would like guidance from OSPI on strategies for developing a resource list and establishing partnerships with government and service providers.

OSPI could expand its training delivery and content to address districts' needs

Districts in rural areas said they would like to see OSPI provide trainings closer to them, because the current training locations are too far away. Currently, OSPI offers in-person training to districts' homeless liaisons annually at the beginning of the school year in two locations: the SeaTac region and Spokane. In the past 18 months, OSPI started to offer training in some regions of the state on a rotating basis. However, the training did not reach all rural areas. In the future, OSPI plans to make regional training offerings more frequent, but because of limited staff capacity, the agency has not determined how often training will be offered and whether training locations selected will be accessible to all rural districts.

While OSPI develops its capacity to offer in-person training more frequently and in more regions of the state, district staff who are not able to attend training can listen to online webinars OSPI and the National Center for Homeless Education have developed. These webinars do not cover everything district homeless liaisons need to know nor provide opportunities to ask questions, but they can address some of the information gap.

District staff also said it would be helpful if OSPI training focused more on best practices. The current training OSPI provides to districts' homeless liaisons focuses primarily on compliance with federal McKinney-Vento Act requirements for the identification and support of homeless students. While the training covers some leading practices, OSPI says the main emphasis is on compliance with the law because training time is limited and it wants to ensure districts are clear on legal requirements.

Districts recommend that OSPI training also provide opportunities for collaboration and sharing strategies. Homeless liaisons would like to learn more about strategies and success stories in other districts that they could apply to better support their students. They also would like additional strategies on various topics, including how other school staff can help identify students experiencing homelessness, tips for creating welcoming environments, building relationships with service providers, and using a trauma-informed approach to serve students.

OSPI says it does not have sufficient capacity to routinely develop comprehensive webinar training, offer more training opportunities for rural school districts, and fully meet districts' needs. However, the agency could examine if it can redirect existing resources or must request additional resources to help districts assist homeless students.

OSPI could facilitate an online forum for homeless liaisons to share information statewide, similar to those implemented in other states

District staff thought it would be beneficial for them to have a way to network and share strategies with each other outside of the trainings OSPI provides at the beginning of the school year. While homeless liaisons can network and develop relationships during training, there is no organized way for them to share information, such as challenges and success stories, throughout the school year and as districts' liaisons change.

As part of this audit, we spoke to homeless education program managers in other states. Minnesota, Missouri and Oregon said they manage an online forum for homeless liaisons to share information and strategies with each other. Questions are usually asked and answered by the homeless liaisons. The state program manager's role is to monitor the forum for accuracy and correct information when needed. OSPI can consider creating a forum for homeless liaisons across the state to share information more efficiently.

State Auditor's Conclusions

Homelessness among students in the K-12 education system is a significant and growing issue in Washington. It is a stressful experience that has real consequences for the student's education. It should come as no surprise that students who experience homelessness miss classes, change schools, and fail to graduate high school far more frequently than other students.

The problem of youth homelessness is a far bigger issue than schools can reasonably be expected to solve. However, schools are in a unique position because they are a hub for the vast majority of children. Federal law requires schools to identify students who experience homelessness and connect them with the services and supports they need to succeed academically. Unfortunately, the cost for schools to meet these obligations far exceeds the dedicated state and federal funding that is available. In the absence of additional resources, the purpose of this audit was to identify actionable options to help schools. These options include actions schools can take themselves to better identify and serve homeless students. OSPI, WSSDA, and the Department of Commerce also have options to better assist schools in their efforts.

Understanding the complex underpinnings of homelessness, especially as it affects children, is an important focus of public policy work in all levels of government. This audit provides key pieces of information on some baseline issues facing homeless students, including housing and transportation needs, as lawmakers and communities consider how to respond to this growing challenge.

Recommendations

For the Office of Superintendent of Public Instruction

To make it easier for districts to access and use available funds, as described on pages 20-21, we recommend:

1. Reach out to school districts to better understand factors that discourage districts from applying for funding and simplify the grant application process accordingly
2. Provide districts more flexibility in using available funding, within the allowable uses of the grants, so they can meet the needs of homeless students (for example, food outside school hours, school supplies)

To help districts provide homeless students the academic flexibility they need to succeed, as described on pages 32, we recommend:

3. Provide guidance to districts to develop policies that inform teachers of students' housing situations with the goal of providing students the academic flexibility they need to succeed

To help districts give homeless students credit-accrual opportunities granted by law, as described on page 33, we recommend:

4. Complete guidance to help districts award credit for partial, unresolved, or incomplete coursework

To help districts reduce the educational effect of transporting homeless students, as described on pages 35-37, we recommend:

5. Provide districts guidance on key factors parents should consider when making student transportation decisions

To help districts reduce the financial effect of transporting homeless students, as described on pages 38-40, we recommend:

6. Provide districts guidance and assistance in establishing inter-district transportation agreements

To address training needs for school districts, as described in pages 49-50, we recommend:

7. Offer more training opportunities for rural school districts
8. Expand training content to place more emphasis on best practices in areas where districts have noted they need more guidance and strategies
9. Examine if existing resources could be redirected or more resources need to be requested

For the Department of Commerce

To make it easier for districts to access and use available funds, as described on pages 20-21, we recommend:

10. Reach out to school districts to better understand factors that discourage districts from applying for funding and simplify the grant application process accordingly
11. Provide districts more flexibility in using HSSP grant to provide rent assistance to students

For the Washington State School Directors' Association

To help districts address issues with transfer of student records needed for enrollment, as described on pages 27-31, we recommend:

12. Align its records transfer policy with the homeless students model policy so that districts can more easily recognize that they should not delay the transfer of a homeless student's records because of unpaid fees and fines

To help address school district needs, as described in pages 42-44, we recommend:

13. Collaborate with OSPI to determine areas of need in which guidance could be most effectively provided through model policy and procedures and develop those model policies and procedures

Guidance for all Washington school districts

We consider the audit results so broadly applicable that it is in the state's best interest for every school district to implement the recommendations listed below to better identify and serve students experiencing homelessness.

To address gaps in identification of homeless students, as described on pages 22-26, we recommend that school districts:

- Distribute the housing questionnaire multiple times during the school year
- Educate students and families about eligibility for support and services
- Follow up with students and families who do not return the questionnaire when there is an indicator they may be experiencing homelessness
- Disseminate material in languages and formats families can understand and in places where they spend time
- Provide training to staff who have regular, close interactions with students
- Screen student data for signs of homelessness

To prevent enrollment delays for homeless students, as described on pages 27-31, we recommend that school districts:

- Train enrollment staff on the enrollment rights of homeless students and rules that apply to their records
- Provisionally place students in class while waiting for records
- Clarify records transfer policies and procedures

To provide homeless students the academic flexibility they need to succeed, as described on page 32-33, we recommend that school districts:

- Establish formal policies and practices to inform teachers of students' housing situations with the goal of providing students the flexibility they need to succeed
- Develop formal policies to authorize and guide teachers in giving homeless students greater flexibility with assignments

To provide homeless students alternative opportunities to earn credit, as described on page 33, we recommend that school districts:

- Consolidate partial credit, unresolved, or incomplete coursework
- Waive courses required for graduation if the student has completed similar coursework elsewhere

To reduce the educational effect of transporting homeless students outside district boundaries, as described on pages 35-37, we recommend that school districts:

- Establish a process to educate and involve families in the development of students' transportation plans

To reduce the financial effect of transporting homeless students outside district boundaries, as described on pages 38-40, we recommend that school districts:

- Establish a process to ensure staff claim reimbursement for all eligible forms of student transportation
- Establish formal inter-district transportation agreements to share responsibility and costs for transportation of homeless students
- Consider alternative forms of transportation, including bus passes, gas cards, or mileage reimbursement

To address gaps in connecting homeless students to community resources, as described on pages 41-45, we recommend that school districts:

- Establish partnerships and referral protocols with their Coordinated Entry programs
- Identify providers who offer services students need and develop resource lists, partnerships, and referral protocols to connect students to these resources

Agency Response



SUPERINTENDENT OF PUBLIC INSTRUCTION

Chris Reykdal Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

April 18, 2019

The Honorable Pat McCarthy
Washington State Auditor
Insurance Building, Capitol Campus
302 Sid Snyder Avenue SW
Olympia, WA 98504-0021

Dear State Auditor McCarthy:

Thank you for the opportunity to review and respond to the K–12 Student Homelessness performance audit. As the audit report indicates, students experiencing homelessness have diverse and complex needs, often extending beyond services public schools in Washington typically provide. However, we know a successful K–12 education experience that prepares these students for their post-secondary aspirations can be life changing, potentially serving as a springboard out of poverty.

At the Office of Superintendent of Public Instruction (OSPI), our work related to student homelessness is guided by the goals and requirements of the federal McKinney-Vento Homeless Assistance Act (1987, 2001, 2015), and by the state Homeless Student Stability and Opportunity Gap Act (2015). In short, these laws require school districts promptly and accurately identify all students experiencing homelessness; marshal services and supports to ensure these students have equal access to the same free, appropriate public education as provided to all students; and maintain school stability and educational continuity, so students experiencing homelessness can achieve educational outcomes consistent with all students. We do our work in support of these requirements primarily by administering small federal and state competitive grant programs to school districts; providing training and technical assistance to schools, districts, and community partners; collecting and analyzing data; and monitoring and reporting progress.

As noted in the report, despite having limited dedicated resources, Washington's school districts have made significant progress over the past five years across three key metrics related to students experiencing homelessness—identification, mobility, and graduation rates. From 2013–2017, school districts:

- Identified 10,325 more students experiencing homelessness (from 30,609 in 2013 to 40,934 in 2017), which represents an increase of about 34 percent over the five-year period.
- Reduced mobility, as defined in the report, for identified students from 8.1 percent to 6.3 percent, representing a decrease of 22.2 percent or 1.8 percentage points. This also represents a narrowing of the gap in the mobility rate between students experiencing

The Honorable Pat McCarthy
April 18, 2019
Page 2

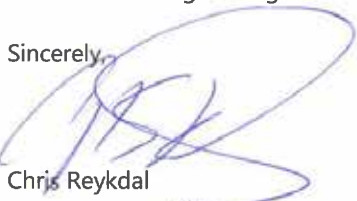
homelessness and all students by 26.9 percent or 1.4 percentage points (from 5.2 percentage points in 2013 to 3.8 percentage points in 2017).

- Increased graduation rates for identified students from 45.1 percent to 55.5 percent, representing an improvement of 23 percent or 10.4 percentage points. This also represents a narrowing of the gap in the graduation rate between students experiencing homelessness and all students by 23 percent or 7.1 percentage points (from 30.9 percentage points in 2013 to 23.8 percentage points in 2017).

Despite having limited dedicated resources in an environment of increased demand, Washington's school districts are making steady, incremental progress across key measures of success for students experiencing homelessness. While their efforts are making a meaningful difference, gaps remain, representing a substantial opportunity for improvement throughout the system.

This audit identifies several areas of focus for OSPI to consider as we strive to improve how we deliver services and supports to school districts across our state. We will consider the recommendations made in the report as we prioritize and administer funding as well as establish and implement our training and support plan for the 2019–20 school year. We will continue to pursue implementation improvements while celebrating the good work our school districts are doing serving students experiencing homelessness throughout Washington.

Sincerely,



Chris Reykdal
Superintendent of
Public Instruction



STATE OF WASHINGTON

April 19, 2019

The Honorable Pat McCarthy
 Washington State Auditor
 P.O. Box 40021
 Olympia, WA 98504-0021

Dear Auditor McCarthy:

Thank you for the opportunity to review and respond to the State Auditor's Office (SAO) performance audit report, "Opportunities to Better Identify and Serve K-12 Students Experiencing Homelessness." The Department of Commerce and Office of Financial Management worked together to provide this response.

We appreciate your team's analysis of the impact of homelessness on the state's kindergarten through 12th grade population and the role Commerce can play in improving homeless housing services to students and families. Commerce's goal is to connect all students experiencing homelessness with the resources needed to ensure they are stably housed.

Policy changes are currently proposed in Substitute Senate Bill 5324 to allow Commerce to contract directly with local service providers who assist students and their families experiencing homelessness. These providers often have greater capacity to apply for and manage this type of grant program. These changes are supported by Commerce and housing and K-12 stakeholders.

Regardless of policy changes that may be adopted by the Legislature, our goal is that all school districts have the information they need to ensure meaningful referrals for students and their families to local homeless housing resources. Commerce is working to address homelessness in all of its forms, including people living unsheltered, in temporary shelter, or doubled up with family and friends for economic reasons.

Sincerely,

Lisa Brown
 Director
 Department of Commerce

David Schumacher
 Director
 Office of Financial Management

cc: David Postman, Chief of Staff, Office of the Governor
 Kelly Wicker, Deputy Chief of Staff, Office of the Governor
 Drew Shirk, Executive Director of Legislative Affairs, Office of the Governor
 Pat Lashway, Deputy Director, Office of Financial Management
 Scott Merriman, Legislative Liaison, Office of Financial Management
 Keith Phillips, Director of Policy, Office of the Governor
 Inger Brinck, Director, Results Washington, Office of the Governor
 Tammy Firkins, Performance Audit Liaison, Results Washington, Office of the Governor
 Scott Frank, Director of Performance Audit, Office of the Washington State Auditor

OFFICIAL STATE CABINET AGENCY RESPONSE TO PERFORMANCE AUDIT ON OPPORTUNITIES TO BETTER IDENTIFY AND SERVE K-12 STUDENTS EXPERIENCING HOMELESSNESS – APRIL 2, 2019

This management response to the State Auditor’s Office (SAO) performance audit report received on April 2, 2019, is provided by the Office of Financial Management and the Department of Commerce.

SAO PERFORMANCE AUDIT OBJECTIVES:

The SAO sought to answer these questions:

1. What are the characteristics, needs, and causes of K-12 student homelessness in Washington’s school districts?
2. How have school districts used McKinney-Vento and Homeless Student Stability Program (HSSP) funding to identify students experiencing homelessness, provide them in-school supports, and connect them to community services?
3. What opportunities exist to help school districts and OSPI strengthen identification, provision of in-school supports, and connections to community services for students experiencing homelessness?

SAO Recommendations 1 (a and b) to Commerce: To make it easier for districts to access and use available funds, as described on pages 16-19, we recommend that Commerce:

- a. Reach out to school districts to better understand factors that discourage districts from applying for funding and simplify the grant application process accordingly.
- b. Provide districts more flexibility in using HSSP grant to provide rent assistance to students.

STATE RESPONSE:

a. Reach out to school districts to better understand factors that discourage districts from applying for funding and simplify the grant application process accordingly.

Policy changes are currently being considered in [Senate Substitute Bill 5324](#) that would allow Commerce to contract directly with local service providers who assist students and their families experiencing homelessness. These providers often have higher capacity to apply for and manage this type of program. These changes are supported by Commerce, the Office of Superintendent of Public Instruction, and Building Changes, a key stakeholder for youth and families experiencing homelessness.

Action Steps and Time Frame

- If SSB 5324 is not enacted, Commerce will reach out to school districts to better understand barriers to applying for funding. *By July 2019.*
- If SSB 5324 is enacted, Commerce will reach out to both school districts and local homeless service providers to better understand barriers to applying for funding, and to explore the potential of school districts leveraging the administrative capacity of housing providers to apply for these funds. *By July 2019.*

b. Provide districts more flexibility in using HSSP grant to provide rent assistance to students.

By July 2019, Commerce will expand allowable uses of HSSP funds to include paying rent for unaccompanied youth and students in families experiencing homelessness when the prioritization of this limited resource is done in accordance with the State’s Coordinated Entry Guidelines.

In [RCW 43.185C.005](#), the Legislature states there is a need for the state to play a primary coordinating role in the provision of services for people experiencing homelessness. Coordinated entry requirements are

central to the state’s efforts to ensure coordinated, efficient, fair, transparent and evidence-based use of limited locally administered federal, state and local homeless housing resources. In addition, the statute is premised on a structure that allows local governments — primarily counties — to determine their own priorities. The statute in particular requires local task forces to prepare and recommend to local government legislative authorities a five-year homeless housing plan that includes performance measures.

As described in the audit, there is a significant mismatch between available resources and the number of students experiencing homelessness and housing instability. Because of this mismatch, all communities and housing providers are forced to make choices about who is served among those who are eligible. The coordinated entry requirements direct communities and housing providers to transparently make decisions on how resources will be divided between subpopulations, and what criteria will be used to determine who is served within those eligible subpopulations.

Prior to coordinated entry, decisions on how to allocate limited housing resources were often inconsistent between providers. These decisions were often based on undocumented criteria, required eligible people to contact more than a dozen organizations before being housed, and resulted in people with the greatest needs being unable to navigate the system to receive housing assistance.

Requiring that housing assistance be prioritized through coordinated entry has been a national best practice for almost a decade (Commerce first introduced it in 2014) and is required by all federal and state homeless housing service providers in our state per the U.S. Department of Housing and Urban Development’s 2017 [Notice](#) and [State Coordinated Entry Guidelines](#). Commerce is assessing all coordinated entry processes in each county through 2019, and is planning to implement new data standards that will enable “by-name” lists of people experiencing homelessness statewide so communities can better prioritize limited resources to the families with the greatest needs.

Although Commerce allowed HSSP funds to be used to pay rent, back rent, security deposits, and utilities during the initial grant cycle, monitoring showed that these funds were used inconsistently, not well targeted, and in contradiction with locally determined priorities. In the second grant cycle, Commerce’s goal was to ensure that the limited HSSP funds were used to identify all the students experiencing homelessness, expand the flexibility of the use of funds to solve problems that could lead to homelessness (such as a bus pass needed to get to a job or renewal of an occupational license needed to keep a job), and connect families that need rent assistance to the much larger pool of rent resources available through coordinated entry.

As of March 2019, the state and federal coordinated entry guidelines and monitoring processes have evolved to allow communities to establish distinct prioritization processes for homelessness prevention and unsheltered homeless families with children. The department is now confident that HSSP funds could be fairly, effectively and transparently used to provide rental assistance under the new state and federal coordinated entry guidelines. The guidelines now allow a community to set aside funds for rent assistance to unstably housed families with children to prevent unsheltered homelessness, and allow multiple access points to coordinated entry, including schools.

Commerce’s Office of Homeless Youth and Office of Family and Adult Homelessness will meet after the Legislature adjourns to determine next steps with contracting and service provision, including allowing the use of HSSP funding to pay for rent assistance for families prioritized by coordinated entry.

Action Steps and Time Frame

- Commerce will determine next steps on contracting and service provisions, including the use of HSSP funding. *By July 31, 2019.*

Appendix A: Initiative 900 and Auditing Standards

Initiative 900 requirements

Initiative 900, approved by Washington voters in 2005 and enacted into state law in 2006, authorized the State Auditor’s Office to conduct independent, comprehensive performance audits of state and local governments.

Specifically, the law directs the Auditor’s Office to “review and analyze the economy, efficiency, and effectiveness of the policies, management, fiscal affairs, and operations of state and local governments, agencies, programs, and accounts.” Performance audits are to be conducted according to U.S. Government Accountability Office government auditing standards.

In addition, the law identifies nine elements that are to be considered within the scope of each performance audit. The State Auditor’s Office evaluates the relevance of all nine elements to each audit. The table below indicates which elements are addressed in the audit. Specific issues are discussed in the Results and Recommendations sections of this report.

I-900 element	Addressed in the audit
1. Identify cost savings	No. This audit focused on improving educational agencies’ ability to identify and assist homeless students. The audit determined school districts do not get enough dedicated funding to identify and support students experiencing homelessness.
2. Identify services that can be reduced or eliminated	No. Identification and support of homeless students is a requirement of the K-12 education system and paramount to ensure homeless students succeed in school. This audit focused on strengthening homeless students’ access to needed support and services, not reducing or eliminating services.
3. Identify programs or services that can be transferred to the private sector	No. Federal law requires educational agencies to identify and support homeless students. While some of the services homeless students need are provided by the private sector, this audit focused on improving partnerships between school districts and government and community service providers, not transferring state services to the private sector.

I-900 element	Addressed in the audit
4. Analyze gaps or overlaps in programs or services and provide recommendations to correct them	Yes. The audit evaluated efforts by OSPI and school districts to identify gaps and opportunities to strengthen how these agencies identify, support, and connect homeless students to services.
5. Assess feasibility of pooling information technology systems within the department	No. The audit scope did not include assessing the information technology systems educational agencies use to manage data related to identification and support of homeless students.
6. Analyze departmental roles and functions, and provide recommendations to change or eliminate them	No. Federal law established the roles and functions of educational agencies regarding homeless students.
7. Provide recommendations for statutory or regulatory changes that may be necessary for the department to properly carry out its functions	No. This audit does not make recommendations for statutory or regulatory changes.
8. Analyze departmental performance data, performance measures and self-assessment systems	Yes. This audit asked about the results school districts achieved and hoped to achieve with their use of funding to identify and support homeless students. The audit also looked at educational outcomes for homeless students to determine if there have been improvements in attendance, mobility, and high school graduation rates.
9. Identify relevant best practices	Yes. The audit identified leading practices, policies, and strategies to help strengthen OSPI and school districts' efforts to identify, support, and connect homeless students to services.

Compliance with generally accepted government auditing standards

We conducted this performance audit under the authority of state law (RCW 43.09.470), approved as Initiative 900 by Washington voters in 2005, and in accordance with generally accepted government auditing standards as published in Government Auditing Standards (December 2011 revision) issued by the U.S. Government Accountability Office. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The mission of the Office of the Washington State Auditor

To provide citizens with independent and transparent examinations of how state and local governments use public funds, and develop strategies that make government more efficient and effective.

The results of our work are widely distributed through a variety of reports, which are available on our website and through our free, electronic [subscription service](#). We take our role as partners in accountability seriously. We provide training and technical assistance to governments and have an extensive quality assurance program.

For more information about the State Auditor's Office, visit www.sao.wa.gov.

Appendix B: Scope, Objectives and Methodology

Scope

This audit obtained insights into K-12 student homelessness and examined the efforts school districts and the Office of Superintendent of Public Instruction (OSPI) have implemented to identify, support and connect students experiencing homeless to community services to identify gaps and opportunities to strengthen efforts.

Objectives

The audit was designed to answer the following questions:

1. What are the characteristics, needs, and causes of K-12 student homelessness in Washington's school districts?
2. How have school districts used McKinney-Vento and Homeless Student Stability Program funding to identify students experiencing homelessness, provide them in-school supports, and connect them to community services?
3. What opportunities exist to help school districts and OSPI strengthen identification, provision of in-school supports, and connections to community services for students experiencing homelessness?

Methodology

To answer the audit questions, we used a variety of qualitative and quantitative approaches. Each method contributed to answering one or more of the audit questions.

Conducted a statewide survey of Washington school districts

We surveyed all 308 school districts, charter schools and state-run schools to obtain a statewide picture of efforts they have implemented to identify, support and connect homeless students to community services; challenges they face accomplishing these activities; gaps in their efforts; and suggestions for improvement.

We contracted with BERK Consulting Inc. to help us design and administer the survey, and to analyze survey results. BERK has expertise in survey design, administration, and analysis; experience working with government entities; and knowledge about homeless policy and landscape in Washington.

Survey design and administration

We designed the survey to be completed by staff at school districts who are responsible for identifying, supporting and connecting to services students who experience homelessness. We asked each district to designate one representative to complete the survey. We pre-tested the survey with a volunteer group that included homeless liaisons, school administrators, school associations and homeless advocates.

The survey was administered through SurveyMonkey.com from May 7 through June 29, 2018. During the survey administration period, we sent reminders, hosted a webinar to answer questions, and offered technical assistance via email and phone.

Survey population and response rate

We sent the survey to a total of 308 public school districts, charter schools and state-run schools. We received 225 responses, for a response rate of 73 percent. **Figure 1** provides the response rate by key district characteristics.

Figure 1 – Survey response rate by district characteristic

School district characteristic	Contacted	Responded	Rate
Urban/Rural			
Rural	204	148	73%
Urban	88	70	80%
Charter or state-run school	16	7	44%
Grant recipient			
None	232	165	71%
Both	16	13	81%
HSSP	22	20	91%
McKinney-Vento	25	22	88%
Any grant	63	55	87%
Charter or state-run school	13	5	38%
Size classification			
Small	150	107	71%
Medium	112	87	78%
Large	33	26	79%
Charter or state-run school	13	5	38%

Figure continues on next page

Figure 1 – Survey response rate by district characteristic, *continued*

School district characteristic	Contacted	Responded	Rate
Percent of students that are homeless			
Fewer than 10 students	45	27	60%
0%	33	19	58%
More than 0% but less than 5%	144	110	76%
More or equal to 5% but less than 10%	46	41	89%
More or equal to 10%	27	23	85%
Charter or state-run school	13	5	38%

Note: State-run and charter schools are reported separately from traditional public schools .

Survey analysis

We conducted qualitative and quantitative analysis of survey results in Microsoft Excel by cross-tabulating information based on district characteristics. Quantitative responses were analyzed using descriptive statistics. We reviewed survey data for completeness and conducted data validation tests before analysis.

Conducted site visits at school districts

We selected 21 school districts for site visits and in-depth interviews to examine how they identify, serve and connect homeless students to services. To obtain insights from a diverse range of demographics and experiences, we selected districts of varying sizes in both eastern and western Washington, in urban and rural areas, and with high and low percentages of homeless students. Additionally, we included districts that received McKinney-Vento or HSSP grant funding and districts that did not receive any grant funding to serve homeless students.

The districts interviewed are listed below:

Aberdeen	Kennewick	Royal
Bainbridge Island	Kiona-Benton City	Seattle
Bellevue	Lake Washington	Shelton
Bellingham	Lind	Spokane
Evergreen (Clark County)	North Thurston	Tacoma
Federal Way	Orondo	Taholah
Granite Falls	Orting	Wellpinit

Through these interviews, we obtained insights about:

- How school districts identify homeless students, provide them in-school supports, and connect them to community services they need
- How school districts have used McKinney-Vento and HSSP funding to identify and support homeless students
- Challenges school districts face in identifying homeless students, providing them in-school supports, and connecting them to services in the community
- Gaps in school districts' efforts and opportunities for improvement
- Causes of student homelessness and student needs

Conducted interviews with students and families who have experienced homelessness

We sought the perspectives of homeless students and families regarding their specific needs and challenges, school districts' efforts to address those needs and challenges, and suggestions for school districts to improve their efforts.

We contracted with BERK Consulting to conduct and analyze interviews. BERK conducted group meetings and phone calls with 43 volunteer families, representing a total of 77 students in the K-12 education system who have experienced homelessness. We obtained perspectives of homeless students and families in various regions of the state and school sizes, as well as a variety of different living arrangements (including doubled-up, living in a shelter and unsheltered). We protected the anonymity of the participants and obtained informed consent from each participant. Interviews were conducted in formats preferred by participants, including in-person or by telephone, individually or in a group setting. BERK provided interpreters as needed.

Conducted focus groups with service providers around the state

To gain further insights on how school districts work with community service providers to connect homeless students to services, we conducted eight focus groups with service providers in seven of the state's nine educational service districts (ESDs). ESDs were used to create geographical representation statewide. Forty-two service providers participated, including those that provide housing, food assistance, mental health care, and medical care. These focus groups allowed us to understand the perspective of the providers regarding their relationships with school districts and identify gaps and challenges in school district efforts.

Analyzed student outcomes data

We analyzed high school graduation rates, school mobility and school attendance for homeless students, low-income students and all students over a five-year period. The purpose of the analysis was to identify changes over time and assess whether student performance had improved, worsened, or remained stable for:

- Homeless students compared with all students and with low-income students, which include those participating in the Free and Reduced-Price Lunch program (FRL). Participation in

FRL is often used as a proxy measure for economically disadvantaged students living below 185 percent of the federal poverty line (currently \$46,435 for a family of four).

- Homeless students in various living arrangements including sheltered, unsheltered, doubled-up, and hotel or motel
- Unaccompanied homeless students
- Homeless students in districts of various characteristics such as geographic location and size

Graduation rates: Graduation rates were analyzed because they are an important indicator of whether homeless students are able to complete school and their potential employment prospects. The analysis presented in this report used four-year adjusted graduation rates.

Attendance: We used OSPI's definition of regular attendance, meaning the student had two or fewer days of absences for every 30 days enrolled. Attendance is an indicator of whether students are attending class and making academic progress.

Student mobility: Student mobility is defined as changing schools within the district at least once in a school year. Student mobility is an indicator of whether students were in a stable enough living situation to remain in the same school that year.

OSPI provided student data, aggregated at the district level for school years 2012-13 through 2016-17. We asked OSPI to include data for student living arrangement (doubled up, living in a hotel or motel, living in a shelter or unsheltered) and unaccompanied status to assess the effect of each type of living arrangement. Because students can have multiple living arrangements throughout their time in school, we asked for a student's most recent status within the year for the attendance and mobility data. For graduation data, we asked for students to be classified by whether they had ever been in a particular living situation. We grouped school districts by school size based on student enrollment, geographic region (east and west), and urban-rural classification to calculate attendance and graduation rates as well as school mobility over time by these characteristics.

Interviewed staff at state agencies

Two state agencies serve a monitoring, assistance, and oversight role over school districts' efforts to serve homeless students: OSPI and the Department of Commerce (Commerce).

OSPI

Staff interviewed included the state coordinator for homeless education, the student transportation office, federal programs staff, and the grant managers for McKinney-Vento and HSSP funding to gain an understanding of the following:

- How the agency helps school districts in their efforts to identify, support and connect students experiencing homelessness to services
- Criteria and processes it uses to award McKinney-Vento and HSSP funding to school districts, allowable uses for this funding, and any performance measures and monitoring the agency utilizes to evaluate effectiveness of funding use
- How it allocates funding to school districts to provide transportation for homeless students and reimbursable modes of transportation

Commerce

We interviewed the staff who manage the HSSP grant at Commerce to understand the criteria and process they use to award HSSP grant funding to school districts, allowable uses for this funding, and any performance measures and monitoring Commerce utilizes to evaluate the effectiveness of funding use.

Interviewed officials in other states

We interviewed officials in nine states to learn about practices, policies, and strategies they use to identify and support students experiencing homelessness. We selected states that had high identification of homeless students or received high marks for their policy and planning efforts by the Institute for Children, Poverty & Homelessness and the American Institutes for Research, respectively. We interviewed the state coordinator for homeless education as well as some school district homeless liaisons in Colorado, Iowa, Louisiana, Maryland, Minnesota, Missouri, Oklahoma, Oregon, and Utah.

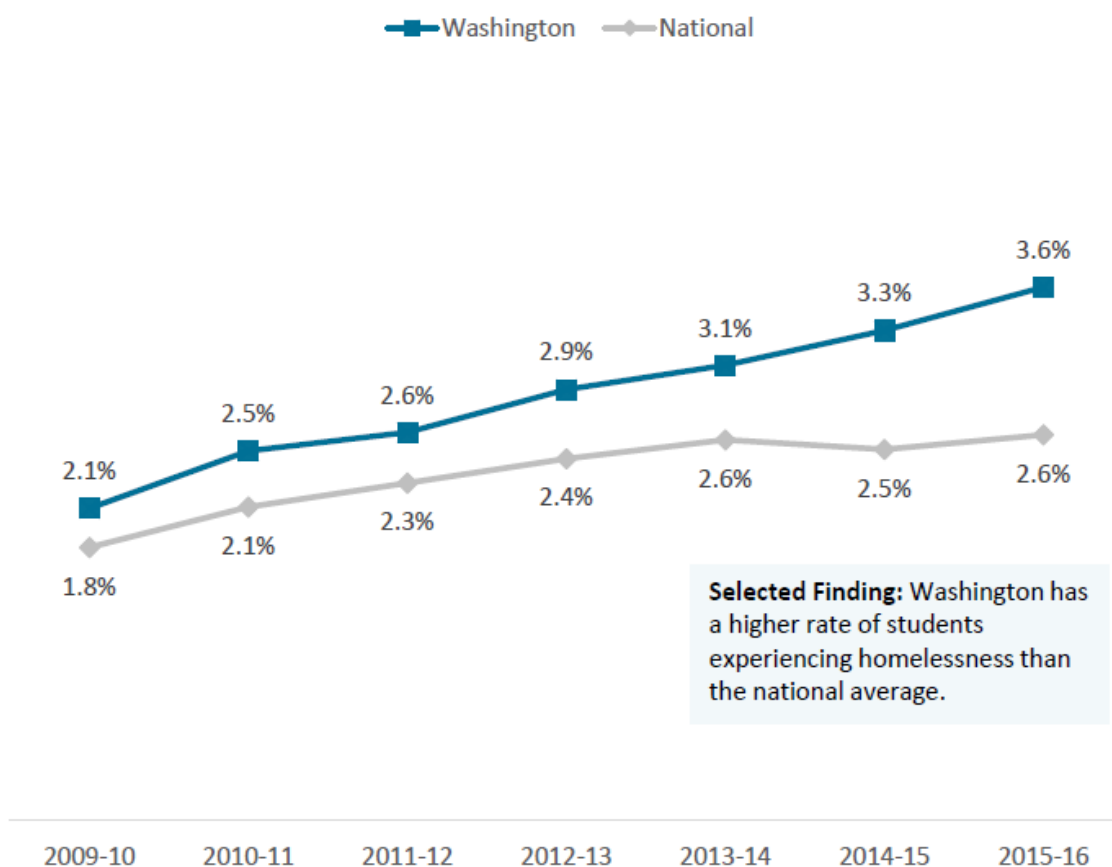
Conducted literature review

We reviewed federal and state laws as well as national leading practices and guidelines to gain an understanding of requirements and to identify leading strategies and policies related to the identification and support of homeless students. Materials reviewed were issued by the U.S. Department of Education and national organizations such as the National Center for Homeless Education.

Appendix C: Student Homelessness in Washington and Nationally

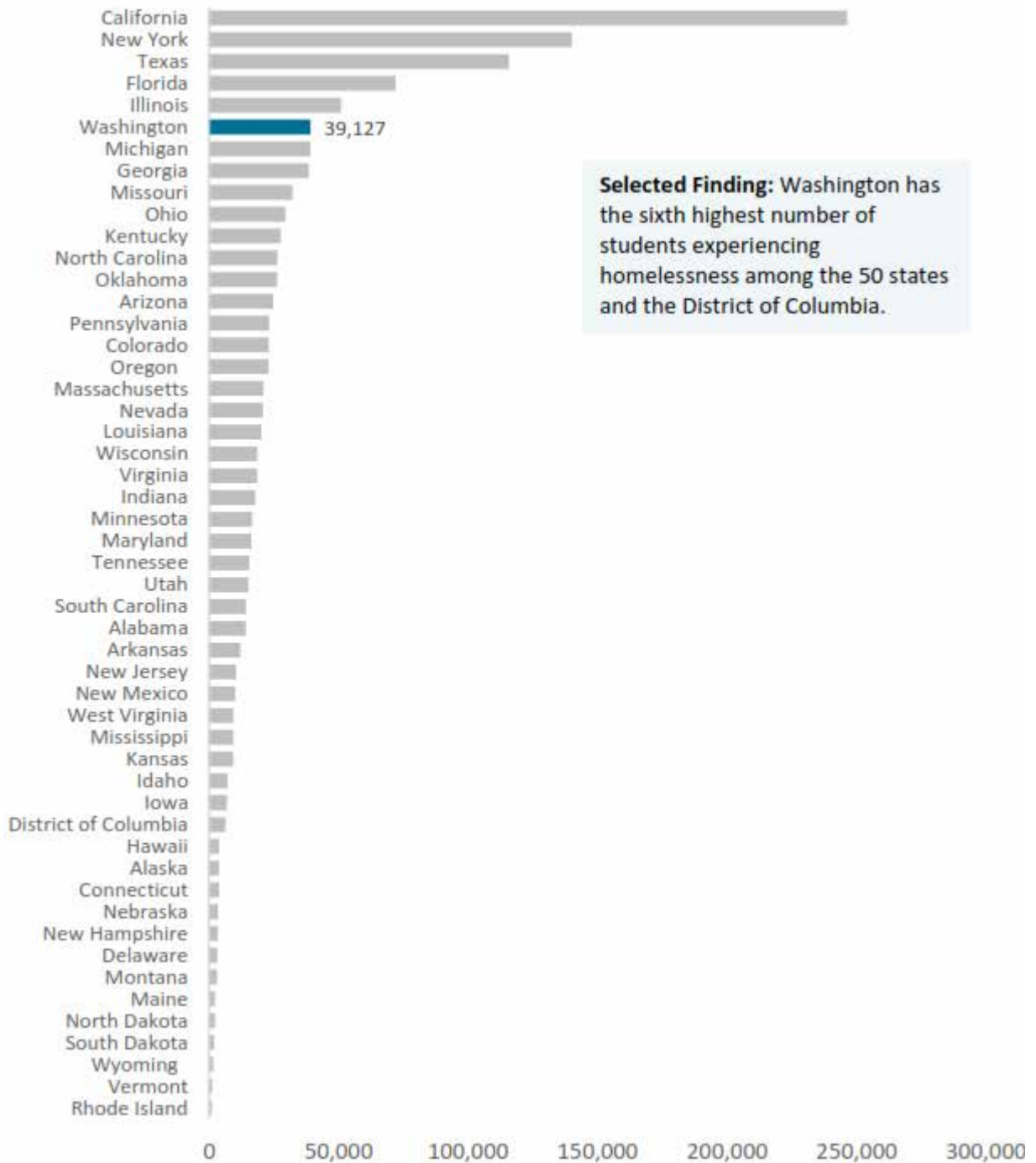
The analyses and graphics in Figures 2, 3 and 4 were prepared by Schoolhouse Washington in its report: [Students Experiencing Homelessness in Washington's K-12 Public Schools](#). Schoolhouse Washington is a nonprofit organization that seeks to improve housing stability and educational success for homeless students in Washington.

Figure 2 – Percentage of Students Experiencing Homelessness, Washington and National, 2009-10 to 2015-16 School Years



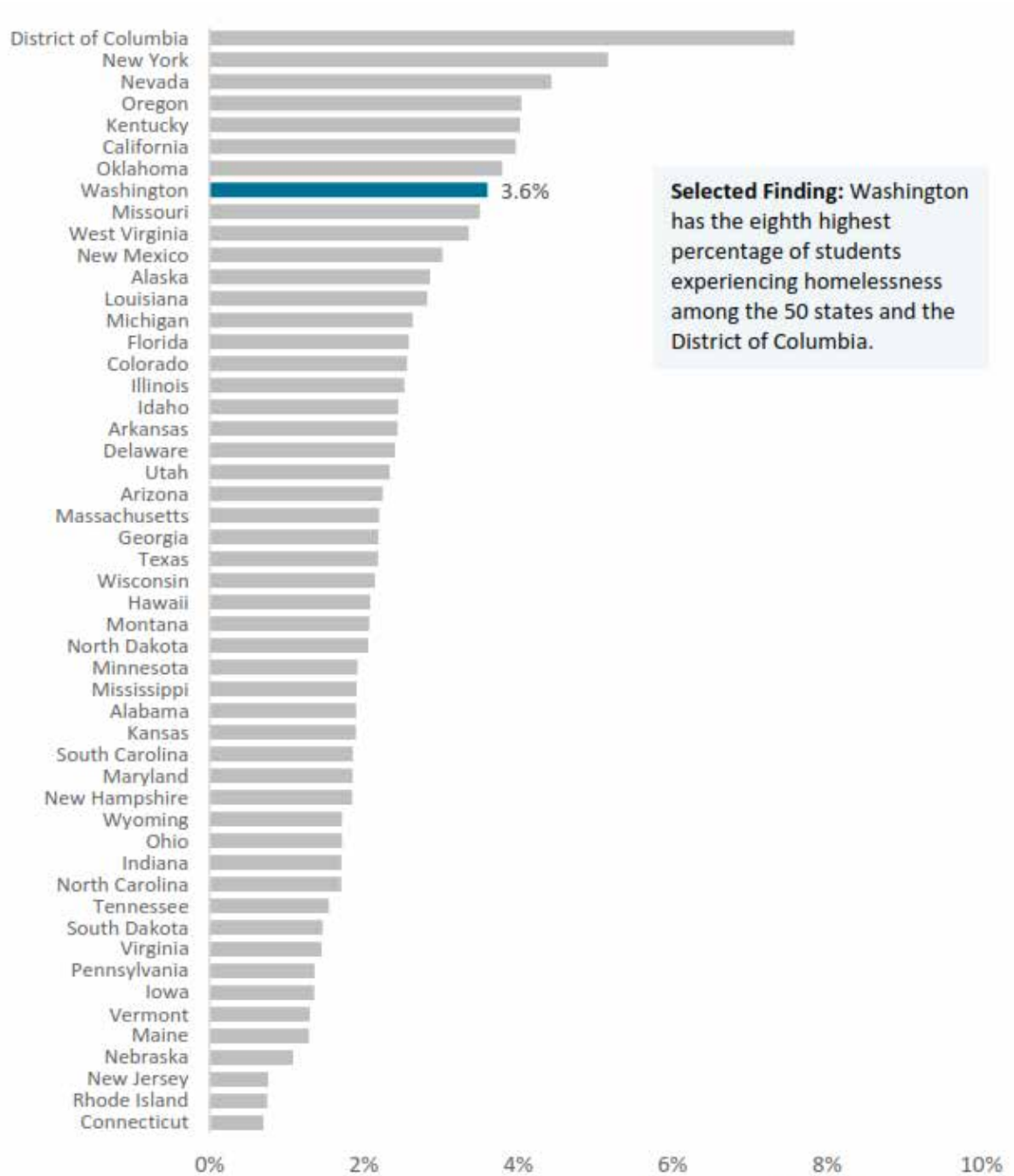
Source: Schoolhouse Washington (online at bit.ly/shwa-k12outcomes).

Figure 3 – Number of Students Experiencing Homelessness by State, 2015-16 School Year



Source: Schoolhouse Washington (online at bit.ly/shwa-k12outcomes).

Figure 4 – Percentage of Students Experiencing Homelessness by State, 2015-16 School Year



Selected Finding: Washington has the eighth highest percentage of students experiencing homelessness among the 50 states and the District of Columbia.

Source: Schoolhouse Washington (online at bit.ly/shwa-k12outcomes).

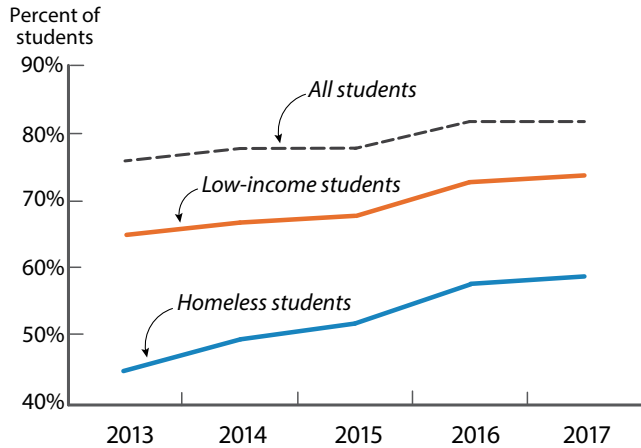
Appendix D: Educational Outcomes

The graphs in this appendix show the results of our student outcomes analysis of data on high school graduation, school attendance and school mobility over a five-year period. District characteristics considered include eastern and western Washington; rural and urban areas; size of school district (small, medium and large); and student grade level (elementary, middle and high school).

Characteristics and measures	Figure numbers	Page
Homeless students compared to all students and low-income students (represented by participation in free and reduced-price lunch programs)	5, 6, 7	73
Homeless students by living arrangement (doubled-up, unsheltered, sheltered, hotel/motel)	8, 9, 10	74
Unaccompanied homeless students compared to all homeless students	11, 12, 13	75
High school graduation rates for all homeless students by district characteristics	14, 15, 16	76
Regular school attendance rates for all homeless students by district characteristics	17, 18, 19, 20	77
School mobility rates for all homeless students by district characteristics	21, 22, 23, 24	78

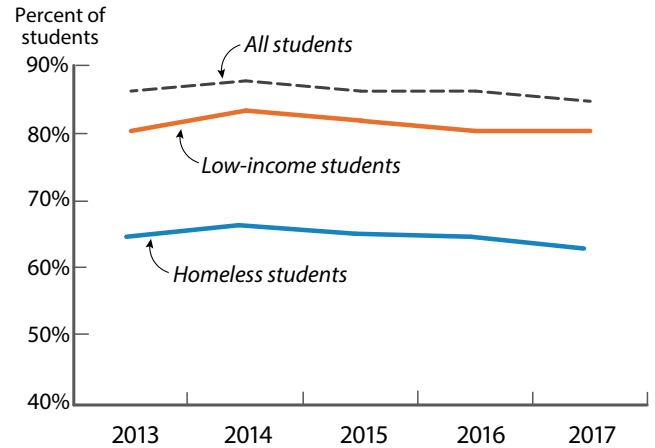
Figures 5, 6, 7 – Overall comparisons. Statewide, homeless students continue to graduate from high school at significantly lower rates, and change and miss school significantly more, than the general student population and low-income students.

Figure 5 – High school graduation rates for homeless students, low-income students and all students



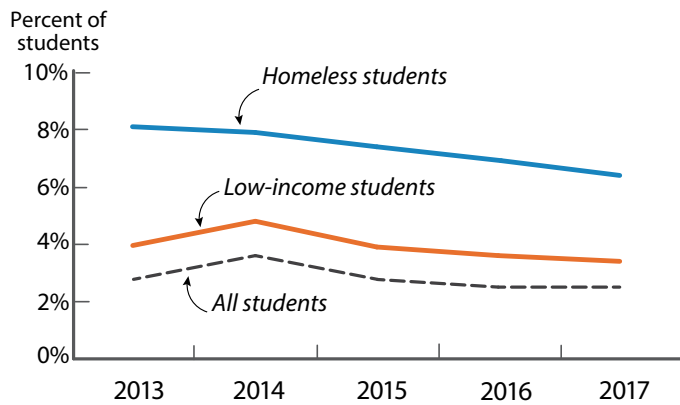
Source: Auditor analysis of OSPI student outcome data.

Figure 6 – Regular school attendance rates for homeless students, low-income students and all students



Source: Auditor analysis of OSPI student outcome data.

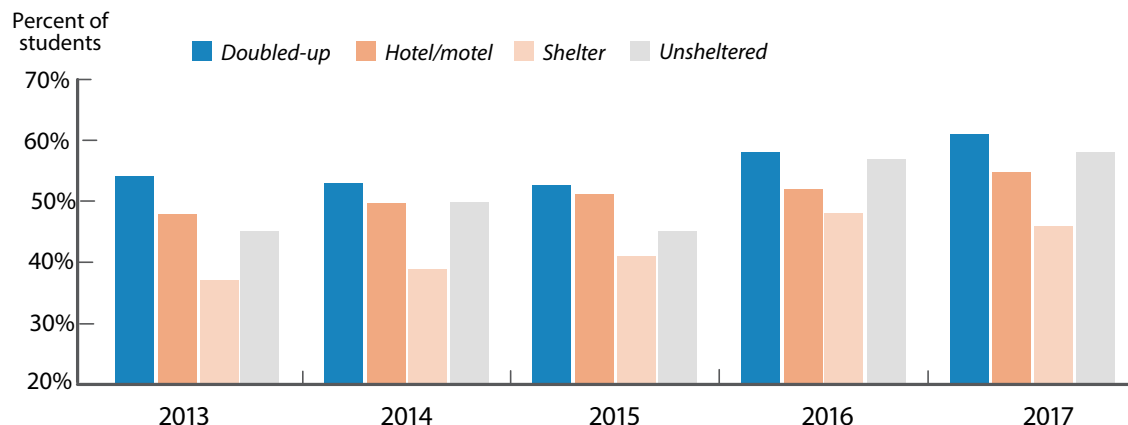
Figure 7 – School mobility rates for homeless students, low-income students and all students



Source: Auditor analysis of OSPI student outcome data.

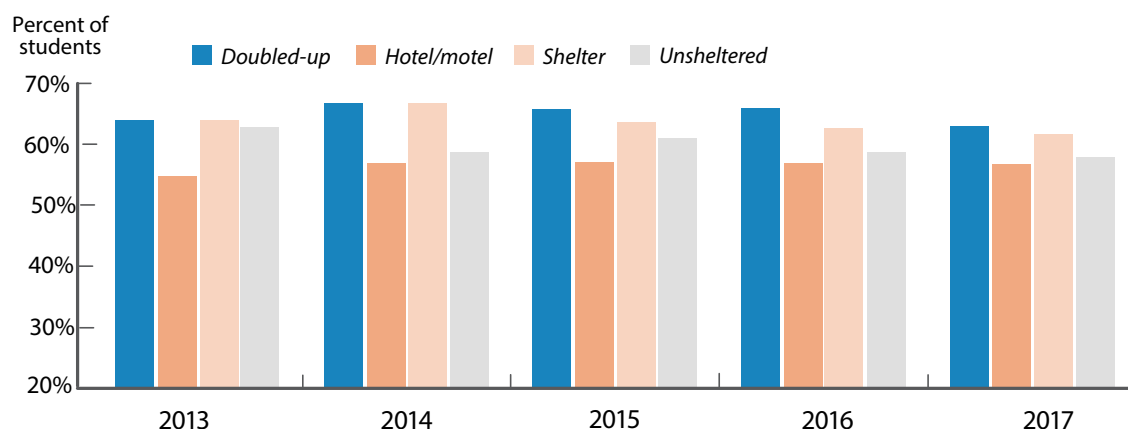
Figure 8, 9, 10 – Doubled-up students. Homeless students living in doubled-up arrangements have similar outcomes for high school graduation, school attendance and school mobility compared to homeless students in other living arrangements.

Figure 8 – High school graduation rates for homeless students by living arrangement
2013 through 2017 school years



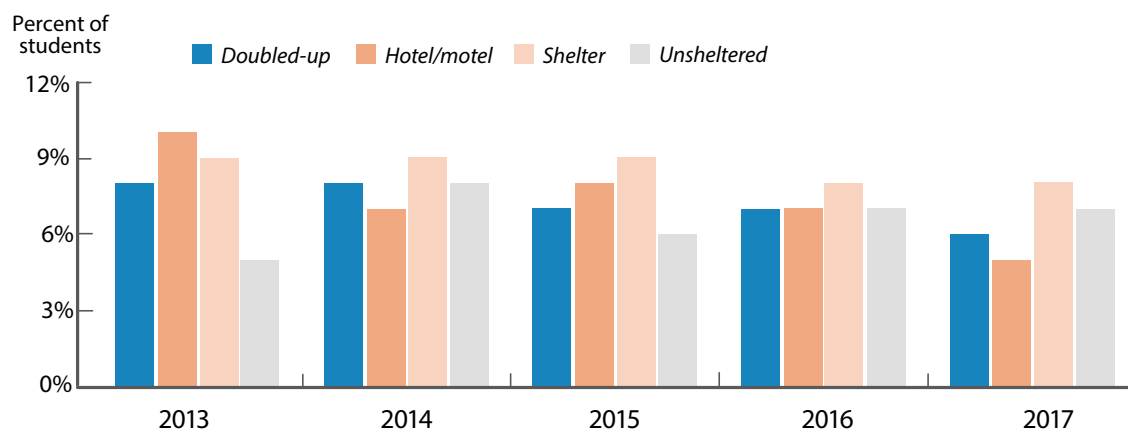
Source: Auditor analysis of OSPI student outcome data.

Figure 9 – Regular school attendance rates for homeless students by living arrangement
2013 through 2017 school years



Source: Auditor analysis of OSPI student outcome data.

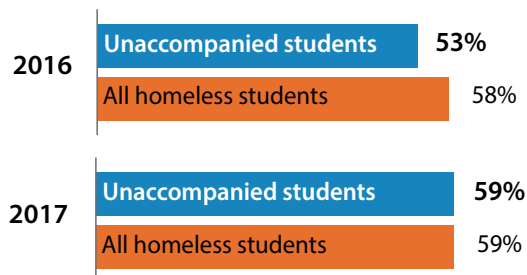
Figure 10 – School mobility rates for homeless students by living arrangement
2013 through 2017 school years



Source: Auditor analysis of OSPI student outcome data.

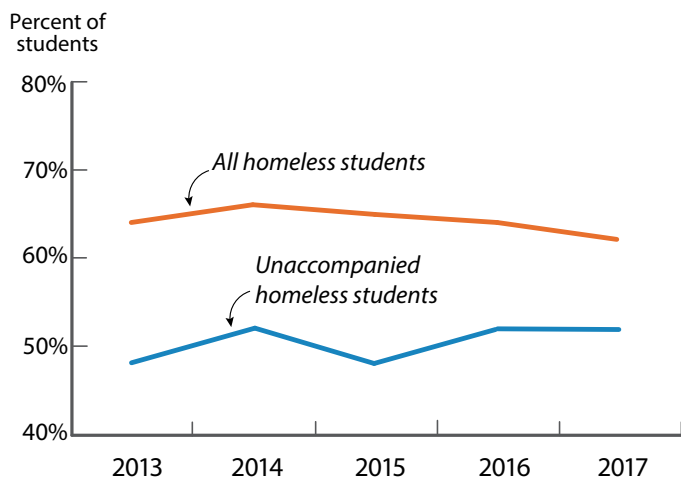
Figures 11, 12, 13 – Unaccompanied students. Unaccompanied homeless students graduate from high school at about the same rate as homeless students who live with a parent or guardian. However, they miss and change schools significantly more than homeless students with parental support.

Figure 11 – High school graduation rates for unaccompanied homeless students compared to all homeless students



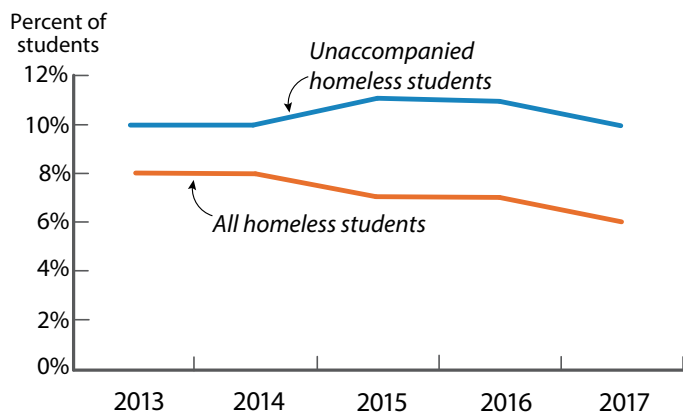
Note: OSPI did not track graduation data separately for unaccompanied homeless students before 2016.
Source: Auditor analysis of OSPI homeless student data.

Figure 12 – Regular school attendance rates for unaccompanied homeless students compared to all homeless students



Source: Auditor analysis of OSPI student outcome data.

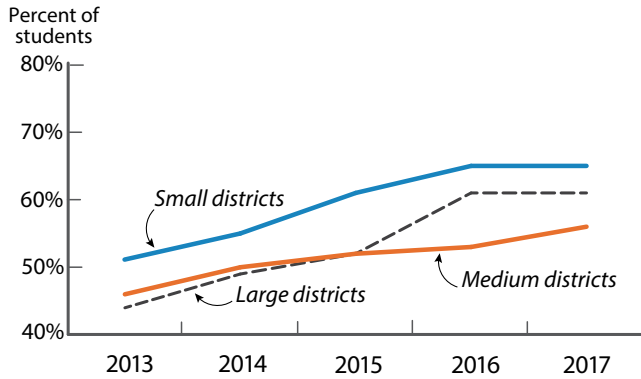
Figure 13 – School mobility rates for unaccompanied homeless students compared to all homeless students



Source: Auditor analysis of OSPI student outcome data.

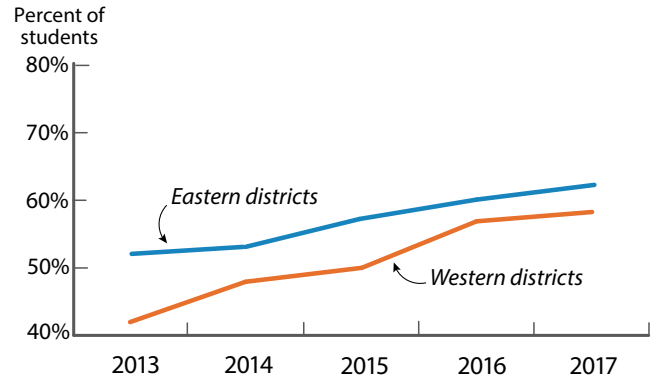
Figures 14, 15, 16 – Graduation rates. Homeless students attending small, rural school districts on the east side of the state are slightly more likely to graduate from high school than homeless students attending large, urban school districts in Western Washington. However, the difference in performance is not significant and this gap has been narrowing over the past five years.

Figure 14 – High school graduation rates for homeless students in small, medium, and large school districts



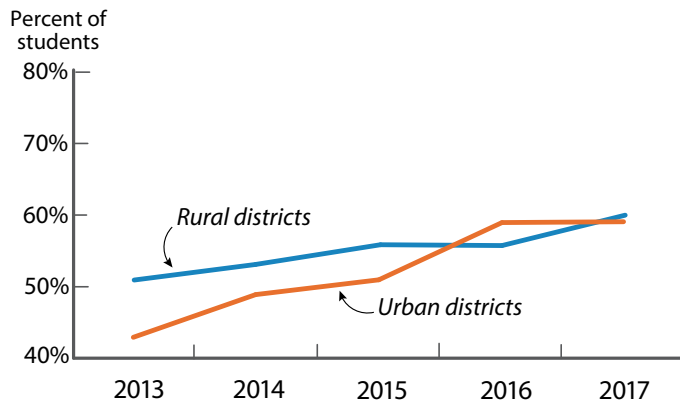
Source: Auditor analysis of OSPI student outcome data.

Figure 15 – Graduation rates for homeless students in eastern and western Washington school districts



Source: Auditor analysis of OSPI student outcome data.

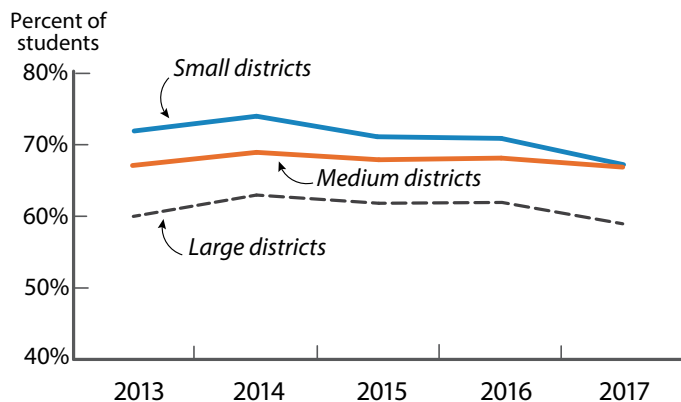
Figure 16 – Graduation rates for homeless students in rural and urban school districts



Source: Auditor analysis of OSPI student outcome data.

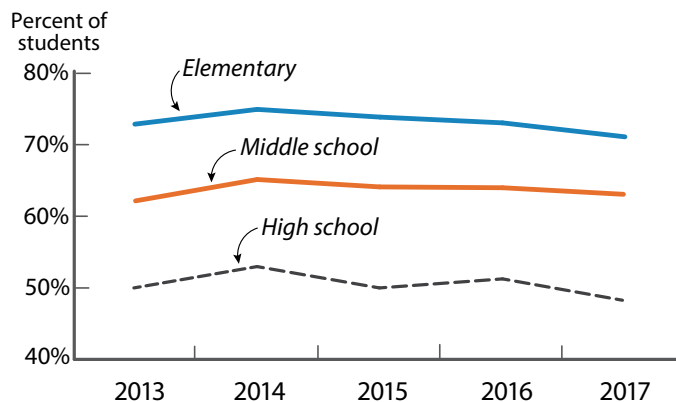
Figures 17, 18, 19, 20 – School attendance. Homeless students attending small, rural school districts on the east side of the state have better school attendance than homeless students attending large, urban school districts in Western Washington. This gap has not narrowed significantly over the past five years. Homeless students of high-school age miss school significantly more than homeless students in elementary and middle school.

Figure 17 – Regular attendance rates for homeless students in small, medium and large school districts



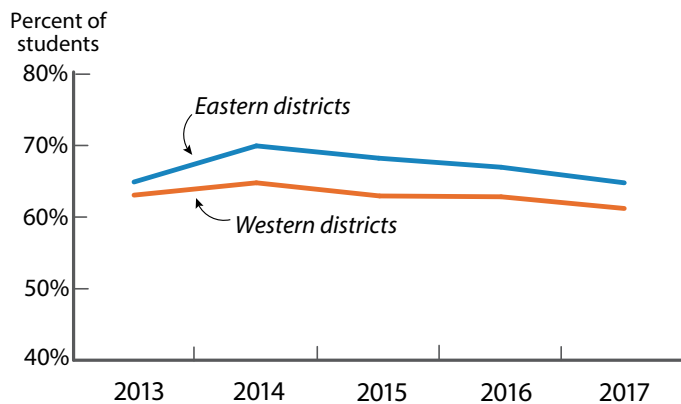
Source: Auditor analysis of OSPI student outcome data.

Figure 18 – Regular attendance rates for homeless students in elementary, middle and high school grades



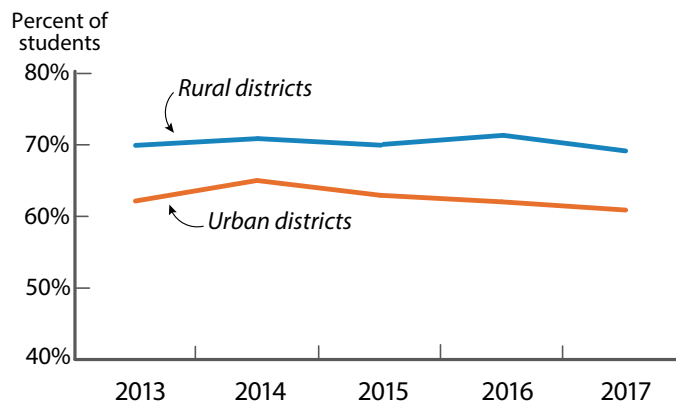
Source: Auditor analysis of OSPI student outcome data.

Figure 19 – Regular school attendance rates for homeless students in eastern and western Washington school districts



Source: Auditor analysis of OSPI student outcome data.

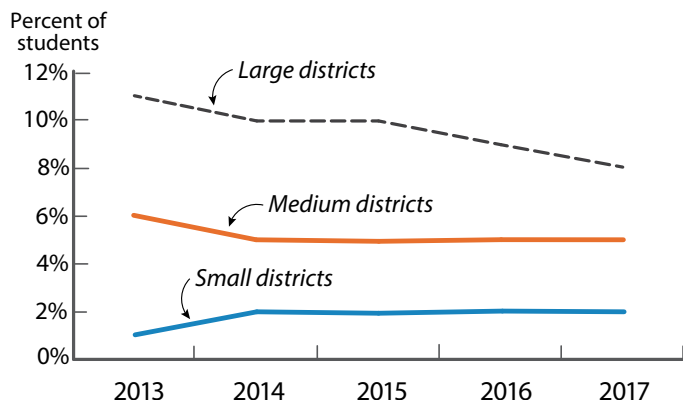
Figure 20 – Regular school attendance rates for homeless students in rural and urban school districts



Source: Auditor analysis of OSPI student outcome data.

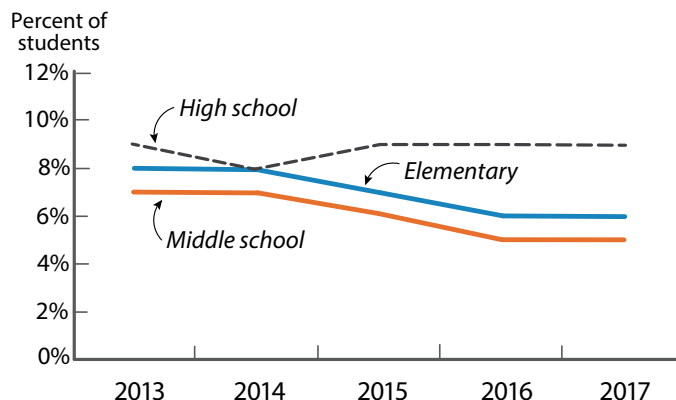
Figures 21, 22, 23, 24 – School mobility. Homeless students attending small, rural school districts change schools significantly less often than homeless students attending large, urban school districts. Homeless students of high-school age change schools considerably more often than homeless students in elementary and middle school.

Figure 21 – School mobility rates for homeless students in small, medium and large school districts



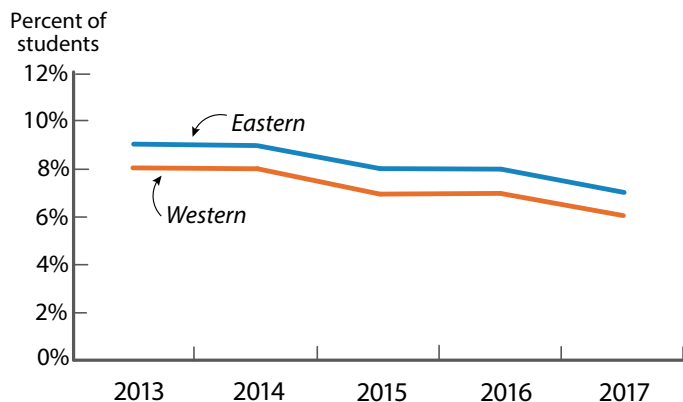
Source: Auditor analysis of OSPI student outcome data.

Figure 22 – School mobility rates for homeless students in elementary, middle and high school grades



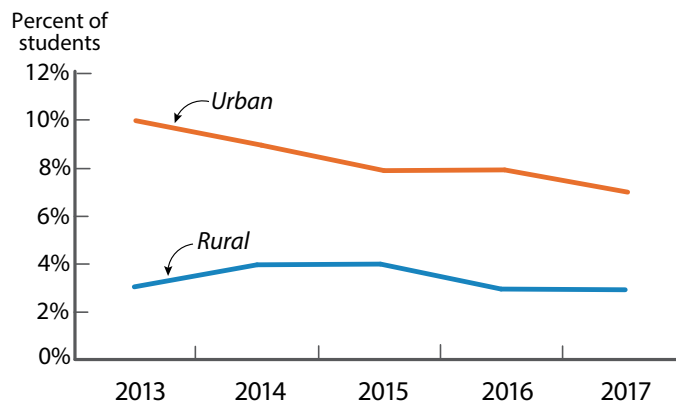
Source: Auditor analysis of OSPI student outcome data.

Figure 23 – School mobility rates for homeless students in eastern and western Washington school districts



Source: Auditor analysis of OSPI student outcome data.

Figure 24 – School mobility rates for homeless students in rural and urban school districts



Source: Auditor analysis of OSPI student outcome data.

Appendix E: 2017-18 McKinney-Vento and HSSP Funding Recipients

School district	Grant type			Total
	McKinney-Vento	OSPI HSSP	Commerce HSSP	
Aberdeen	\$27,318			\$27,318
Battle Ground	\$27,318		(shared with Evergreen)	\$27,318
Bellingham	(shared with Mount Baker)	\$52,228	\$195,000	\$247,228
Bethel		\$92,127		\$92,127
Central Valley (Spokane)	\$47,318			\$47,318
Centralia	\$22,318			\$22,318
Eatonville	\$17,318			\$17,318
Enumclaw	\$17,318			\$17,318
Everett	\$32,318		\$60,000	\$92,318
Evergreen	\$32,318	\$83,943	\$270,000 (shared with Battle Ground and Vancouver)	\$386,261
Granite Falls	\$22,318			\$22,318
Highline	\$42,318		\$118,000	\$160,318
Kelso		\$111,452		\$111,452
Mount Adams		\$65,422		\$65,422
Mount Baker	\$47,318 (shared with Bellingham)			\$47,318
Mount Vernon	\$22,318		\$35,000	\$57,318
North Thurston	\$32,318	\$98,654		\$130,972
Oak Harbor	\$22,318			\$22,318
Ocean Beach	\$22,318			\$22,318
Ocosta	\$17,318			\$17,318
Okanogan	\$17,318			\$17,318
Olympia	\$27,318			\$27,318
Puyallup	\$27,318			\$27,318
Seattle	\$42,318	\$91,697		\$134,015
Selah		\$4,000		\$4,000
Shelton	\$27,318		\$45,000	\$72,318
South Whidbey	\$17,318	\$64,000	\$25,000	\$106,318

School district	Grant type			Total
	McKinney-Vento	OSPI HSSP	Commerce HSSP	
Spokane	\$42,318	\$55,000		\$97,318
Sumner	\$27,318			\$27,318
Tacoma	\$42,318	\$104,207		\$146,525
Taholah		\$25,200		\$25,200
Tukwila	\$27,318		(shared with Highline)	\$27,318
Tumwater	\$22,318			\$22,318
Vancouver	\$32,318		(shared with Evergreen)	\$32,318
Wenatchee	\$27,318		\$72,000	\$99,318
Woodland			\$55,000	\$55,000
Total	\$832,222	\$847,930	\$875,000	\$2,555,152

Note: These figures do not include the one-time McKinney-Vento grants of \$7,500 given to 13 districts in the 2017-18 school year.

Source: OSPI & Commerce



“Our vision is to increase **trust** in government. We are the public’s window into how tax money is spent.”

– Pat McCarthy, State Auditor

Washington State Auditor’s Office
P.O. Box 40031 Olympia WA 98504

www.sao.wa.gov

1-866-902-3900



Office of the Washington State Auditor