



Indiana Department of Education
SUPPORTING STUDENT SUCCESS

January 20, 2011

Mr. Stephen Edwards
Marion Community Schools
1240 South Adams Street
Marion, Indiana 46952

Dear Mr. Edwards:

On November 1, 2010, the Indiana Department of Education's (IDOE) monitoring team commenced an on-site monitoring review of the Marion Community Schools' administration and oversight of McKinney-Vento projects, in accordance with the McKinney-Vento Education for Homeless Children and Youth Act. Enclosed is a report based upon this review.

The enclosed report summarizes the results of our on-site monitoring review. **Within 30 business days of the date of this letter**, please submit a response, and where appropriate, further documentation. IDOE will review the documentation and determine if it is sufficient to remove or remedy identified compliance problems.

In all cases where there are findings of non-compliance, **Marion Community Schools are responsible for taking appropriate action to remedy compliance deficiencies**. In some instances this can occur immediately and in some instances a longer term solution may be necessary. Where longer term measures are necessary, the corporation must submit a specific detailed action plan with timelines and benchmarks for corrective action. IDOE will provide technical assistance as appropriate.

We would like to thank you and your staff, as well as the staff at Family Service Society for the work and assistance provided prior to and during the review in gathering materials and providing access to information in a timely manner.

We look forward to continued cooperation in working with you and your staff members on any follow-up activities to assist in the effective delivery of education services for students experiencing homelessness.

Sincerely,

Amy Bush, Director
Leneé Reedus, Supervisor
Office of Title I Academic Support

cc: Dr. June Robinson
Marion Community Schools

Connie Rose
Family Service Society

Indiana Department of Education
McKinney-Vento Education for Homeless Children and Youth Monitoring

Monitoring Date: November 1, 2010

Monitoring Team: Christina Endres & Leneé Reedus

Background Information

The Indiana Department of Education (IDOE) conducted an on-site monitoring visit with Marion Community Schools regarding the McKinney-Vento Project Grants on November 1, 2010. The purpose of this monitoring visit was to identify areas of strength, areas that need improvement, and areas of non-compliance with homeless education laws and federal grants management (fiscal) requirements.

IDOE specifically monitored in the following areas:

1. Local educational agencies will designate an appropriate staff person, who may also be a coordinator for other Federal programs, as a local educational agency liaison for homeless children and youths. 42 USC 11432 (g)(J)(ii)
2. Each liaison for homeless children and youth shall ensure homeless children and youths are identified by school personnel and through coordination activities with other entities and agencies. 42 USC 11432 (g)(6)
3. The local educational agency shall implement a coordinated system for ensuring that homeless children and youths are promptly provided necessary services, including transportation. 42 USC 11432 (e)(3)(E)
4. In order to help low-achieving children meet challenging achievement academic standards, each local educational agency plan shall include a description of how the local educational agency will coordinate and integrate services provided with other educational services at the local educational agency or individual school level, such as services for homeless children, a description of the services the local educational agency will provide homeless children, including services provided with funds reserved. 20 USC 6312
5. Students experiencing homelessness have the right to immediate enrollment in the school of origin or the local school. LEAs must have a process for resolution of disputes and provide a statement of rights to homeless youth or their parent/guardian. In order to expedite enrollment, LEAs must enroll students even if documentation normally required is absent. 42 USC 11432 (g)(3)(E); 42 USC 11432 (g)(3)(C); 42 USC 11432 (e)(3)(C)
6. Liaisons for homeless children and youth shall, as a part of their duties, coordinate and collaborate with State coordinators and community and school personnel responsible for the provision of education and related services to homeless children and youth. Development and growth of collaborative relationships should be evident. 42 USC 11432 (g)(6)(C)
7. Local educational agencies have developed and shall review and revise policies to remove barriers to the enrollment and retention of homeless children and youths in school. 42 USC 11432 (e)(3)(E)(iv); 42 USC 11432(g)(1)(I)
8. The Local Education Agency subgrant plan for services to eligible homeless students meet all requirements. (fiduciary) 42 USC 11432(e)(1); 42 USC 11433

During the on-site visit, IDOE spent time interviewing staff from Marion Community Schools at the district's central office. IDOE also reviewed documents from Marion Community Schools and Family Service Society pertaining to implementation of state and federal homeless education laws including the use of grant funds. Based on the above information, our report follows.

Monitoring Topic 1: Local educational agencies will designate an appropriate staff person, who may also be a coordinator for other Federal programs, as a local educational agency liaison for homeless children and youths.

Background

IDOE interviewed the district McKinney-Vento program director.

Statutory Requirement: McKinney-Vento Liaison requirements are located in 42 USC 11432(g)(J)(ii) and I.C. 50-1-3.

Areas of Compliance

Meets Standard: Barbara Nehring, through a partnership with Family Service Society, is registered with the IDOE as the McKinney-Vento Liaison for the district. At the time of the interview, contact information related to the homeless program was listed online. To view the contact information, three separate webpages must be visited under the Departments and Services menu. Additional information about homelessness and services is also listed on the page. Board policy listed on the website further requires the superintendent to designate a liaison.

Recommendation: It is recommended that Ms. Nehring’s contact information be posted on the district homepage or the Parents and Students main page. Currently, while the information is posted online, it is not on the main page for the website. Posting it on the homepage or the main page for Parents and Students would be more consistent with the intent of I.C. 50-1-3. An additional link could then be provided to the extra information currently provided.

Monitoring Topic 2: Each liaison for homeless children and youth shall ensure homeless children and youths are identified by school personnel and through coordination activities with other entities and agencies.

Background

IDOE interviewed the district McKinney-Vento program director.

Statutory Requirement: McKinney-Vento Liaison requirements pertaining to identification and coordination are located in 42 USC 11432 (g)(6). Evidence provided must include a housing questionnaire or similar documentation, or documented communication with local community services providers, or proof of events targeted to homeless students. A description of the process used to ensure data accuracy must also be provided.

Areas of Compliance

Meets Standard: Examples of handouts and activities used to raise awareness about homelessness with the district staff and community were provided. A copy of a log of training

and outreach events conducted by Ms. Nehring was also provided. Copies of weekly summary forms completed by district social service specialists, a referral form used by the program, and flyers from NCHE were also available for review. The description of data procedures adequately indicated the district takes steps to ensure homeless students are identified, their data is recorded, and that students are included from all referral sources.

Monitoring Topic 3: The local educational agency shall implement a coordinated system for ensuring that homeless children and youths are promptly provided necessary services, including transportation.

Background

IDOE interviewed the districts McKinney-Vento program director.

Statutory Requirement: McKinney-Vento Liaison requirements pertaining to the LEA's coordinated system for service delivery is located in 42 USC 11432 (e)(3)(E). Evidence must include a written policy for transportation. Additional evidence may include bus routes, inter-district transportation agreements, contracts with transportation providers.

Areas of Compliance

Meets Standard: The district webpage containing contact information for the McKinney-Vento Liaison references the district's desire to assist families with transportation but the information is not contained in the formal board policies found elsewhere on the website. Information regarding services for homeless students is provided to multiple groups, including subsets of district staff, by various members of the McKinney-Vento program and special services staff. A sample request for special transportation form was provided, along with a supporting email communication between school district staff coordinating transportation. The district was also able to provide district bus routes for homeless students.

Recommendation: It is recommended the board's transportation policy be updated to include students experiencing homelessness to better support the information provided on the district website.

Monitoring Topic 4: In order to help low-achieving children meet challenging achievement academic standards, each local educational agency plan shall include a description of how the local educational agency will coordinate and integrate services provided with other educational services at the local educational agency or individual school level, such as services for homeless children, a description of the services the local educational agency will provide homeless children, including services provided with funds reserved.

Background

IDOE interviewed the districts McKinney-Vento program director.

Statutory Requirement: Requirements pertaining to the coordination with other programs may be found in 20 USC 6312. Evidence must include information from the Title I application indicating coordination and set-aside.

Areas of Compliance

Meets Standard: The Title I, Part A application indicating a set-aside for homeless students was provided along with several sample invoices for expenditures related to the set-aside.

Recommendation: Planning for activities to serve homeless students should be done in a collaborative manner, with regular updates through the course of the year to ensure services are adequate and funds are appropriately spent. It is recommended the McKinney-Vento staff and Title I staff plan together to ensure services are provided that will best use funds and increase student achievement.

Monitoring Topic 5: Students experiencing homelessness have the right to immediate enrollment in the school of origin or the local school. LEAs must have a process for resolution of disputes and provide a statement of rights to homeless youth or their parent/guardian. In order to expedite enrollment, LEAs must enroll students even if documentation normally required is absent.

Background

IDOE interviewed the districts McKinney-Vento program director.

Statutory Requirement: Dispute resolution, enrollment, and student rights requirements are located in 42 USC 11432 (g)(3)(E), 42 USC 11432 (g)(3)(C) and 42 USC 11432 (e)(3)(C). Evidence must include a statement of student rights and a dispute resolution policy. Supplemental evidence may include a sample letter explaining a decision to deny enrollment or services, including the notification of a student's right to appeal; letters or memoranda to assist with enrollment; fee waivers; or timeline waivers for medical, school, or other records.

Areas of Non-Compliance

Approaching Standard: The district was able to provide an expenditure report that provided evidence of fee waivers for expenses such as a carpentry class. Letters by district staff, including building principals, and sample free and reduced price benefits applications evidenced the district's efforts to provide services such as free meals. Board policy posted on the district website indicates a student's right to attend school while disputes are being resolved, and the district commitment to provide determinations in writing to students and parents, along with information regarding the right to appeal determinations. Board policy and the webpage

containing the liaison contact information explain the basic information required in a statement of rights. The district was unable to ensure all homeless students or their parents receive a copy of the statement of rights or the frequency with which the rights are distributed. The statement also does not contain a line for parent or unaccompanied youth and district liaison signature. A list of factors for school placement determinations clearly shows student needs as the primary cause for placement determinations.

Required Action: The statement of rights should be updated to include parent/guardian or unaccompanied youth signature, along with the district liaison signature. The district must provide the statement of rights to students at the time of enrollment and at least twice annually. The updated statement should be submitted to IDOE no later than February 18, 2011.

Monitoring Topic 6: Liaisons for homeless children and youth shall, as a part of their duties, coordinate and collaborate with State coordinators and community and school personnel responsible for the provision of education and related services to homeless children and youth. Development and growth of collaborative relationships should be evident.

Background

IDOE interviewed the districts McKinney-Vento program director.

Statutory Requirement: A description of liaison responsibilities for coordination and collaboration with other persons and agencies is located in 42 USC 11432 (g)(6)(C). Evidence must include MOU's or contracts with community agencies, or flyers and other evidence of outreach efforts. Supplemental evidence must include one of the following: resource lists, documentation that a clinic provided services to a homeless student, or proof of payment for a school related activity paid for a student through school funding.

Areas of Compliance

Meets Standard: The district was able to provide a log of groups and agencies the liaison trains or provides information to annually, letters of support and MOU's provided with the most recent application, a report indicating services provided to students residing in the local shelter, a resource list, and expenditure reports indicating services provided. The district also was able to describe meetings held to discuss topics pertaining to homeless education and staffing of student situations. Free and reduced priced benefits applications and supporting letters from the School Food Coordinator were also provided.

Monitoring Topic 7: Local educational agencies have developed and shall review and revise policies to remove barriers to the enrollment and retention of homeless children and youths in school.

Background

IDOE interviewed the districts McKinney-Vento program director.

Statutory Requirement: A description of the responsibility to remove barriers and revise policies may be found in 42 USC 11432 (e)(3)(E)(iv) and 42 USC 11432(g)(1)(I).

Areas of Compliance

Meets Standard: Adequate information regarding policies and procedures that had been changed to meet student needs was provided. Board policies were reviewed and revised in May 2010 and the website was updated within the month prior to the program visit. Additionally, a training was conducted for school secretarial staff as many of them were new to their positions. Topics related to enrollment, data entry, and transportation were addressed. Procedures have been altered to ensure services are provided in a more timely manner by utilizing social specialists in assisting the liaison with more general services, allowing the liaison to focus on more complex situations.

Monitoring Topic 8: The Local Education Agency subgrant plan for services to eligible homeless students meet all requirements. (fiduciary)

IDOE interviewed the districts McKinney-Vento program director.

Statutory requirements for fiscal procedures may be found in 42 USC 11432(e)(1) and 42 USC 11433. Evidence required includes a statement of actual expenditures made from grant funds.

Areas of Compliance

Exceeds Standard pertaining to internal control: New billing processes were shared, including invoice procedures and allowances. Due to changing needs of the district, a request was made to proactively change the line items in order to ensure funds were spent in accordance with McKinney-Vento regulations and in the best interest of the students while maximizing district and community resources. The district program director was able to recite separate fund numbers from memory and showed IDOE staff the listing she keeps on her desk to ensure she has information available when tracking funds for both ARRA and regular McKinney-Vento funds. The McKinney-Vento program director and the Title I program administrator must verify claims for payment prior to the release of funds by the business office. The monthly staff meetings are also used to compare expenditures with data, to ensure both are accurate.