



I. Policy Statement

The Board of Education of Howard County is committed to ensuring that all children and youth have equal access to educational programs and school-related activities. To that end, the Board seeks to eliminate all barriers to the enrollment of children and youth who are homeless and eligible to attend public school in Howard County.

The Board further ensures that staff will assist all children and youth who are homeless and enrolled in the Howard County Public School System (HCPSS) in maintaining a stable educational environment by minimizing the effects of homelessness on their academic achievement and their social-emotional development.

II. Purpose

The purpose of this policy is to provide guidelines to ensure that children and youth who are homeless are enrolled in the HCPSS without barriers and that they receive equal access to all educational programs and school-related activities.

III. Definitions

Within the context of this policy, the following definitions apply:

- A. **Dispute Resolution** – A process for addressing disagreements regarding the enrollment, school selection, or services for children and youth who are homeless.
- B. **Homeless Advisory Committee** – A group of school-based and community representatives involved in the coordinated delivery of services to children and youth who are homeless.
- C. **Homeless Student** – A student who lacks a fixed, regular, and adequate nighttime residence, whether or not the temporary housing is located in Howard County, including:
 - 1. Students who are sharing the housing of other persons due to loss of housing or to economic hardship, or due to a similar reason; living in motels, hotels, transitional housing, or campgrounds due to the lack of alternative accommodations; living in emergency or transitional shelters; abandoned in

- hospitals; are runaways, living in shelters or other inadequate accommodations; or awaiting foster care placement.
2. Students who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings.
 3. Students who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings.
 4. Migratory students as defined under federal law who qualify as homeless because they are living in the circumstances above.
- D. Homeless Education Liaison – Individual identified by the school district to ensure that the rights of students who are homeless, in accordance with McKinney-Vento Homeless Assistance Act (hereinafter known as the McKinney-Vento Act), are protected.
- E. McKinney-Vento Act – A federal law that describes the educational rights of children and youth who are homeless.
- F. Parent – Any one of the following, recognized as the adult(s) legally responsible for the student:
1. Biological parent – A natural parent whose parental rights have not been terminated.
 2. Adoptive parent – A person who has legally adopted the student and whose parental rights have not been terminated.
 3. Custodian – A person or an agency appointed by the court as the legal custodian of the student and granted parental rights and responsibilities.
 4. Guardian – A person who had been placed by the court in charge of the affairs of the student and granted parental rights and responsibilities.
 5. Caregiver – An adult resident of Howard County who exercises care, custody or control over the student, but who is neither the biological parent nor legal guardian, as long as the person satisfies the requirements of the Education Article section 7-101 (c) (Informal Kinship Care).
 6. Foster parent – An adult approved to care for a child who has been placed in their home by a state agency or a licensed child placement agency as provided by the Family Law Article section 5-507.
- G. School-Aged Students – Students who meet the age registration requirements for admission to a Maryland public school.

- H. School-Related Activities – On- or off-premises activity in which a student directly participates (e.g., field trip, school system-sponsored athletic event, class/graduation activities), or one in which the student does not directly participate but represents the school or student body simply by being there (e.g., spectator at a school system-sponsored event).
- I. Title I – A federally funded program designed to ensure all children access to a high-quality education.

IV. Standards

- A. The rights of all children and youth who are homeless and eligible for enrollment in the HCPSS will be protected in accordance with the McKinney-Vento Act.
- B. Children and youth who are homeless are eligible for services described under Title I, Part A of the Elementary Students Education Act (ESEA), whether or not they reside in a Title I school attendance area or meet the academic standards required of other children for eligibility.
- C. Reasonable efforts will be made to identify all school-aged children and youth residing in Howard County who are homeless.
- D. Students who are homeless will be enrolled in school as soon as information is received that the student is homeless.
- E. Students who are homeless and become permanently housed during the school year will retain McKinney-Vento protections for the remainder of that school year.
- F. Students who are homeless will be provided services comparable to the services offered to other students in the school in which the homeless student is enrolled.
- G. Students who are homeless and meet academic eligibility requirements are eligible to participate in extracurricular activities, including interscholastic athletics.
- H. Transportation will be provided for students who are homeless in accordance with requirements in the McKinney-Vento Act.
- I. Food and nutrition services will be provided immediately upon the identification or enrollment of a student who is homeless.

- J. Information will be provided annually for school-based staff regarding the McKinney-Vento Act, the unique needs of students who are homeless, and staff's role in working with these students.
- K. The HCPSS will designate a Homeless Education Liaison for students who are homeless.
- L. The dispute resolution process will be used to resolve all disputes regarding enrollment, school selection, and services for students who are homeless.
- M. The Homeless Advisory Committee will assist with coordination of delivery of services to children and youth who are homeless and enrolled in the HCPSS.

V. Compliance

- A. The Superintendent is responsible for ensuring that the provisions of the McKinney-Vento Act are followed.
- B. Pupil Personnel Workers, in collaboration with the Homeless Education Liaison, are responsible for the identification of all school-aged children and youth who are homeless in Howard County, including those who have self-identified.
- C. Principals are responsible for ensuring the immediate enrollment of students who have been identified as homeless.
- D. Principals, in collaboration with the Homeless Education Liaison, are responsible for ensuring that students who are homeless are provided with comparable services offered to other students.
- E. The Homeless Education Liaison and the Title I Coordinator are responsible for ensuring that all children and youth who are homeless receive services comparable to Title I services and supports and that the local Title I plan describes the services and supports provided.
- F. The Director of Transportation, in collaboration with the Homeless Education Liaison, is responsible for coordinating the transportation of students who are homeless attending Howard County public schools.
- G. The Director of Student Services will designate the Homeless Education Liaison.
- H. The Director of Food and Nutrition, in collaboration with the Homeless Education Liaison, is responsible for the immediate coordination of food and nutrition services as soon as the homeless student is enrolled.

- I. The Homeless Education Liaison is responsible for ensuring that the dispute resolution process is used to resolve all disputes regarding enrollment, school selections, and services for students who are homeless.
- J. The Homeless Education Liaison is responsible for ensuring that information is provided annually to school-based staff regarding the McKinney-Vento Act and the unique needs of students who are homeless.
- K. The Homeless Education Liaison is responsible for chairing the Homeless Advisory Committee.

VI. Delegation of Authority

The Superintendent is authorized to develop appropriate procedures to implement this policy.

VII. References

- A. Legal
 - McKinney-Vento Homeless Assistance Act, Reauthorization 2002
 - COMAR 13.A.05.09
 - Family Law Article 5-507
- B. Other Board Policies
 - Policy 5200 Pupil Transportation
 - Policy 9000 Enrollment, Residency, Student Assignment and Admission to Pre-K and Kindergarten
 - Policy 9060 Rehabilitation Act of 1973 Compliance: Section 504
 - Policy 9070 Academic Eligibility for High School Extracurricular Activities
 - Policy 9080 Interscholastic Athletic Program
- C. Other
 - Caregiver's Authorization Form for Students in Temporary Housing/Unaccompanied Youth
 - Certification Statement for Homeless Children Automatic Eligibility for Free Meal Benefits
 - Dispute Resolution Process for Students in Temporary Housing - Form 1
 - Dispute Resolution Process for Students in Temporary Housing, Request for Due Process – Form 2
 - Know Your Rights brochure
 - Parental Release of Information Form
 - Request for Services from Community Action Council Form
 - Student in Temporary Housing (SITH) Form
 - Student in Temporary Housing Transportation Request Form

ADOPTED: June 9, 2011
AMENDED:
EFFECTIVE: June 9, 2011

I. Definitions

Within the context of these procedures, the following definitions apply:

- A. **Bona Fide Residence** – A person’s actual residence maintained in good faith. It does not include a temporary residence or a superficial residence established for the purpose of attendance in the Howard County Public School System (HCPSS).
- B. **Case Management** – Comprehensive services beginning with the identification of children, youth, and families who are homeless. Case Management includes identifying a student’s social, emotional, academic, or health-related needs as well as linking children, youth, and families to community resources/services.
- C. **CINA (Child in Need of Assistance)** – A child under the age of 18 deemed by the court to be in need of assistance due to physical, sexual, or emotional abuse or neglect by a caretaker.
- D. **Date Identified** – The date a student/family is initially determined to be homeless by the HCPSS.
- E. **Enrollment Barriers** – Requirements or procedures of a school district that could prohibit or delay the attendance of a student who is homeless in school.
- F. **English for Speakers of Other Languages (ESOL)** – A course offering designed for English language learners, which provides instruction and English language development.
- G. **Free and Reduced Meals Services (FARMS)** - A federal food services program that provides free or reduced priced meals for eligible low-income families.
- H. **Gifted and Talented** – A program that provides differentiated services that are substantially different from the regular school program for students who have distinct learning needs based on their individual capabilities.
- I. **Problem-Solving Team** – School-based group of people that includes, but is not limited to, administrators, teaching staff, and representatives from the Office of Student Services.

- J. School of Choice – The school of origin or the school in the attendance area where the student is temporarily residing.
- K. School of Origin – The school a student attended when permanently housed or the school in which a student was last enrolled before becoming homeless.
- L. Section 504 – A part of the Rehabilitation Act of 1973 that provides accommodations for individuals with disabilities.
- M. Special Education – Specially designed instruction to meet the unique needs of a student with an educational disability.
- N. SITH (Student in Temporary Housing) Form – A registration form used when enrolling students who are homeless.
- O. Unaccompanied Homeless Youth – A student who is homeless and not in the physical custody of a parent.

II. Identification of Students Who Are Homeless

- A. All school-based staff will assist Pupil Personnel Workers in identifying children and youth who are homeless while ensuring privacy and confidentiality.
- B. School staff who suspect that a student’s enrollment or withdrawal is related to a lack of permanent housing will contact the assigned Pupil Personnel Worker or the Office of Pupil Personnel.
- C. Any student or parent who believes they are homeless may self-identify.
- D. If it has been determined that a child or unaccompanied youth lacks permanent housing, the child or unaccompanied youth will be offered immediate registration and enrollment.
- E. The Homeless Education Liaison and Pupil Personnel Worker will collaborate with agencies in Howard County, including Grassroots, Domestic Violence Center, Community Action Council, and the Department of Social Services, to identify and support children and youth who are homeless in the Howard County community.
- F. The Pupil Personnel Worker will ensure that the identity and other relevant information about every school-aged child who is homeless is kept confidential. This information may be shared on a need-to-know basis with staff.

- G. The Homeless Education Liaison, Pupil Personnel Workers, and school personnel will work collaboratively with the Office of Special Education to identify all children from birth-5 years who are homeless and who may be in need of educational services and other support.

III. Enrollment

- A. A school must immediately contact their Pupil Personnel Worker when they suspect a child or unaccompanied youth may be homeless.
- B. Children and youth who have been identified as homeless must be enrolled even if their records, such as academic records, birth certificate, immunizations, proof of residency, or guardianship information are not available at the time of enrollment.
 - 1. The enrolling school will immediately contact the last school the student attended to obtain relevant academic records.
 - 2. If immunization and other health records are not available from the previous school, the Pupil Personnel Worker will work in collaboration with the Cluster Nurse to assist the family in obtaining the records. If the immunization records cannot be located, the Cluster Nurse will assist the family in obtaining the required immunizations.
 - 3. The Cluster Nurse, Health Assistant, and Pupil Personnel Worker will also work in collaboration with the Homeless Education Liaison to provide information to the family about basic dental and healthcare services offered in the community.
- C. If no parent or guardian can be contacted upon enrolling students aged 17 or younger, the Pupil Personnel Worker should refer the students to the Homeless Education Liaison. If the Homeless Education Liaison is unable to contact the parent or guardian, the case will be referred to the Howard County Department of Social Services for the purpose of designating the student as a CINA (Child in Need of Assistance).
- D. The Pupil Personnel Worker will assist the family in understanding their rights, the services available to their child, the dispute resolution process, and the appeal procedures, at the time of enrollment. The Pupil Personnel Worker will also provide the family with the Know Your Rights brochure. In conjunction with the completion of the SITH Form, the Pupil Personnel Worker will assist the family in completing the Request for Services from Community Action Council Form.

- E. Upon enrollment, the name of the student will be provided immediately to the Office of Food and Nutrition Services, and the student's eligibility for free meals will begin immediately.
- F. A Student in Temporary Housing (SITH) Form will be completed by the Pupil Personnel Worker at the time of enrollment of a homeless student.
 - 1. The SITH Form must be completed annually or whenever a student relocates to a different temporary residence.
 - 2. If a student has been residing in the same residence for two consecutive years as established by the SITH Form, the Pupil Personnel Worker will determine if the family still meets the criteria for homelessness.
 - a. If the two-year period expires in the middle of a school year, the student retains rights under the McKinney-Vento Act through the end of the school year.
 - b. If the Pupil Personnel Worker and the Homeless Education Liaison determine that the student continues to be homeless beyond the two-year period, the student will continue to receive protections.
- G. If a homeless shelter requires that a Parental Release of Information Form be completed so that information may be shared with the school, the Pupil Personnel Worker will assist the parent in completing the form.

IV. Unaccompanied Homeless Youth

- A. When an unaccompanied homeless youth requests enrollment in school, the school will immediately notify the Pupil Personnel Worker or the Homeless Education Liaison to determine if the youth is homeless. Once a determination is made that the unaccompanied youth is homeless, the school will follow the enrollment procedures outlined in section III of these procedures, above.
- B. The Pupil Personnel Worker will complete the SITH Form and the Caregiver's Authorization Form for Students in Temporary Housing/Unaccompanied Youth.
- C. The Pupil Personnel Worker will explain and present all available school placement options so that the student can make an informed choice.
- D. The Pupil Personnel Worker, acting as the student's case manager, will assist the student in obtaining the necessary transportation, school supplies, social services support, medical services, and personal supplies needed.

- E. The Pupil Personnel Worker will inform the unaccompanied homeless youth about the dispute resolution process to ensure that the youth knows the options that exist in case the student disagrees with decisions made by school personnel regarding enrollment, school selection, or services.

V. School Choice

- A. The McKinney-Vento Act entitles students who are homeless to continue their education either:
 - 1. At their school of origin for the duration of the student's homelessness.
 - 2. At the school in the attendance area serving their temporary residence.
- B. The Pupil Personnel Worker or Homeless Education Liaison will consult with the parent to determine the school that is in the best interest of the student. The Pupil Personnel Worker or Homeless Education Liaison will, to the extent feasible, keep a child who is homeless in the school of origin, unless doing so is contrary to the wishes of the child's parent.
- C. Children and youth who are homeless and are matriculating from one level of school to another (elementary to middle or middle to high school) and who remain homeless between academic years will continue in the feeder system of schools of origin unless the parent wishes that his/her child attend the school serving their temporary residence. Transportation will be provided to the child or youth if the child or youth resides outside of the school's walking area.
- D. In selecting the school which is in the best interest of the homeless student, the following two-step process will be followed:
 - 1. The parent and the Pupil Personnel Worker will determine which school will best serve the interests of the student, including consideration of the following factors:
 - a. The student's age
 - b. The school which the student's siblings attend
 - c. The student's experiences at the school of origin
 - d. The student's academic needs
 - e. The student's emotional needs
 - f. Any other special needs of the family
 - g. Continuity of instruction
 - h. Length of stay in the shelter
 - i. The likely location of the family's future permanent housing
 - j. Time remaining in the school year

- k. Distance of commute and other transportation-related factors, and
 - l. The safety of the child.
 2. The parent and the Pupil Personnel Worker will determine whether the student's placement in the school selected is feasible, upon consideration of transportation requirements and other aspects of school placement, including the following:
 - a. Length of ride time
 - b. The distance to be traveled
 - c. The availability of buses and personnel
 - d. The ability to reroute buses
 - e. The availability and cost of alternative transportation modes, such as taxis, personal transportation, or public transit, as permitted by law.
- E. The homeless student will remain in the school determined to be in the student's best interest for as long as the student remains homeless, or if the student becomes permanently housed, until the end of the academic year.
- F. Once the SITH Form is completed, the Pupil Personnel Worker or the Homeless Education Liaison will explain to the parent:
 1. The student's right to enrollment in the school of choice
 2. The right to appeal a school placement decision with which the parent or unaccompanied youth does not agree
 3. Services offered during an appeal.

VI. Comparable Services

Each student who has been identified as homeless will be provided services comparable to the services offered to other students in the school where the student attends. These services include:

- A. Transportation
 1. Students who are homeless will be provided with transportation services to the school that is determined to be in their best interest and comparable to the services provided to non-homeless students. Arrangements to transport the child will be made within seven school days.
 2. When comparable transportation services are not available, the adult who transports the student will be offered mileage reimbursement, at the current

Internal Revenue Service standard mileage travel reimbursement rate, or payment of public transportation fares.

3. For out-of-district bus services and/or travel reimbursement, the Pupil Personnel Worker will submit the transportation request form to the Office of Pupil Transportation for processing. A copy of the form will be retained in the Office of Pupil Personnel.
4. Once transportation arrangements have been made, the Office of Pupil Transportation will notify the parent and send verification to the bus contractor, the Office of Pupil Personnel, and the school.

B. Food and Nutrition

1. Upon completion of the SITH Form, a designated Pupil Personnel Worker will complete and submit a copy of the Certification Statement for Homeless Children Automatic Eligibility for Free Meal Benefits to the Office of Food and Nutrition Services.
2. The Office of Food and Nutrition Services will confirm the student's enrollment and inform the appropriate cafeteria manager of the student's eligibility to receive free meals.
3. A student who is homeless will receive free meals beginning the first day of enrollment as a student in temporary housing.
4. A student enrolled as homeless is eligible for free meals for the entire school year even if the student becomes permanently housed.
5. Schools will not require students who are homeless to complete the application for free and reduced meals.

C. Educational Services

1. The Pupil Personnel Worker will assist appropriate school staff in determining whether, and to what extent, the student meets eligibility criteria for appropriate educational services.
2. Eligible students will receive as many of the following services as appropriate:
 - a. Academic Intervention
 - b. Special Education
 - c. ESOL

- d. Gifted/Talented
- e. Section 504

- 3. The Office of Academic Intervention and the Title I Programs staff will work together with the Office of Pupil Personnel staff to ensure that homeless students are receiving Title I or comparable services as needed.

VII. Responsibilities of the Homeless Education Liaison

- A. Provide training for Pupil Personnel Workers and other school-based staff to ensure prompt identification and enrollment of children and youth who are homeless.
- B. Disseminate information in all schools, Central Office locations, and in selected community agencies regarding the rights of children and youth who are homeless.
- C. Participate and assist with mediating disputes that occur regarding the enrollment, school selection, and provision of services for homeless children and youth, and ensure the consistent implementation of the dispute resolution process.
- D. Chair meetings of the Homeless Advisory Committee whose purpose is to ensure the coordinated delivery of services to children and youth who are homeless.
- E. Provide training for Pupil Personnel Workers to ensure that children and youth who are homeless are offered case management services that result in the delivery of appropriate educational and related services.
- F. Ensure that Pupil Personnel Workers monitor the academic, attendance, and behavioral data for students who are homeless.
- G. Write and manage grants that provide funds to support the education of children and youth who are homeless.
- H. Collaborate with the Homeless Education Coordinator of the Maryland State Department of Education (MSDE) to ensure the delivery of appropriate services and supports to children and youth who are homeless.
- I. Ensure that Pupil Personnel Workers inform parents/guardians and unaccompanied youth about available transportation services and assist them in obtaining transportation.
- J. Communicate regularly with representatives of community agencies that provide services and supports to children and youth who are homeless and their families.

- K. Ensure prompt reporting of required data to the MSDE.

VIII. Dispute Resolution

- A. If a dispute arises regarding the enrollment, school placement, or services provided to a homeless student, the parent or unaccompanied youth will receive information explaining the dispute resolution process. The Pupil Personnel Worker will provide this information, which includes a copy of written instructions for engaging the dispute resolution process and the Dispute Resolution Process for Students in Temporary Housing – Form 1.
- B. During the dispute resolution process, the homeless student will be:
 - 1. Admitted to the school of choice.
 - 2. Provided transportation to that school until the dispute is resolved.
- C. The dispute resolution process includes the following procedures:
 - 1. A parent or unaccompanied youth who requests dispute resolution will submit a completed copy of the Dispute Resolution Process for Students in Temporary Housing - Form 1 to the principal. Copies of this completed form will be provided to the Pupil Personnel Worker and the Homeless Education Liaison.
 - 2. Upon receipt of the completed form, the principal and Pupil Personnel Worker will meet with the parent or unaccompanied youth within five school days to resolve the dispute.
 - 3. Using the Dispute Resolution Process for Students in Temporary Housing – Form 1, the principal will provide a written explanation of the school’s decision, within five school days, including the right to appeal.
 - 4. If the parent or unaccompanied youth is not in agreement with the principal’s decision, or if the principal does not issue a written decision within five school days, a written complaint, using the Dispute Resolution Process for Students in Temporary Housing, Request for Due Process - Form 2, should be submitted to the Homeless Education Liaison within five school days of the decision.
 - 5. Upon receipt of the dispute form for due process, the Homeless Education Liaison will meet with the parent or unaccompanied youth and attempt to resolve the dispute. The Homeless Education Liaison will provide a written

explanation of his/her decision, including the right to appeal. The meeting must be scheduled and the written decision provided within 10 school days.

6. If the parent or unaccompanied youth is not in agreement with the decision of the Homeless Education Liaison, or if the Homeless Education Liaison does not issue a written decision within 10 school days, a written appeal should be made to the Board. Appeals to the Board should be sent to the Administrative Specialist to the Board, 10910 Route 108, Ellicott City, MD 21042. Appeals to the Board must be filed within 30 calendar days of the decision of the Homeless Education Liaison or the failure of the Homeless Education Liaison to issue the decision.
7. The Board of Education will meet to hear the appeal within 45 calendar days after receiving the appeal request.
8. If the parent or unaccompanied youth is dissatisfied with the decision of the Board, an appeal may be issued in writing to the Maryland State Board of Education. Appeals to the Maryland State Board of Education must be made within 30 days of the decision of the local Board of Education.

IX. Case Management and Support

- A. Pupil Personnel Workers will be responsible for the case management and coordination of services for homeless children and youth.
- B. Case management and coordination of services will include:
 1. Facilitating the completion of the SITH Form and transportation forms
 2. Ensuring the immediate registration and enrollment of the homeless student
 3. Coordinating supports and services when a family has children attending multiple schools
 4. Collecting academic and health records
 5. Collaborating with the school-based problem-solving team to address and monitor the social, emotional, academic, and health-related needs of the student
 6. Ensuring that the student has the necessary school supplies and materials

7. Referring families of students who are homeless to community resources such as mental health, social services, housing, medical and dental, employment, food banks, emergency shelter, and other services, as needed
8. Collaborating with other school personnel, including school counselors, administrators, and health services staff, regarding the specific needs of the student who is homeless
9. Requesting assistance as needed from the school-based problem-solving team
10. Monitoring the student's academic progress, attendance, and behavior
11. Referring the student for academic intervention, if needed
12. Completing quarterly progress reports and homeless reports
13. Serving as the point of contact between the school, the family, and the community
14. Ensuring that parents and guardians of children and youth who are homeless are informed of the educational and related opportunities available to their children and are provided with meaningful opportunities to participate in the education of their children
15. Assisting with the transition of homeless children and youth who transfer out of the HCPSS to other school systems.

X. Special Considerations

- A. Students identified as homeless will be referred to a school-based problem-solving team to provide academic, social-emotional, and/or socioeconomic support as needed.
- B. Schools will use the academic intervention and support services available at the school prior to requesting assistance from other sources.
- C. Students who are homeless may require consideration and accommodations when circumstances beyond their control impact their school performance and engagement.
- D. Students who are homeless will receive school-based waivers for field trips and any fees associated with school-related graduation activities.

- E. Staff will use alternate ways to engage and involve parents of students who are homeless.
- F. Counselors will ensure that students who are homeless have information regarding tuition waivers for comprehensive summer school and selected school system summer programs.
- G. High school counselors will ensure that students who are homeless have information regarding free registration for college placement exams and college applications as well as information on qualifying for financial support in college.
- H. Students who are homeless and meet academic eligibility requirements are eligible to participate in extracurricular activities, including interscholastic athletics.

ADOPTED: June 9, 2011

AMENDED:

EFFECTIVE: June 9, 2011