



DISTRICT OF COLUMBIA

OFFICE OF THE STATE SUPERINTENDENT OF

EDUCATION

Homeless Data Collection, Reporting, and Use Guidance

Issued: February 15, 2017

This document summarizes the legal requirements and best practices for the collection, reporting, and use of homeless data for the 2016-17 school year.

Federal Policy Requirements for Homeless Data

With the passage of the Every Student Succeeds Act (ESSA), states are required to improve their identification and reporting of homeless students [(42 U.S.C. 11432(d)(2) and 42 U.S.C. 11432(d) (5)]. Because of a data sharing agreement with The Community Partnership for the Prevention of Homelessness (TCP), the Office of the State Superintendent of Education (OSSE) is poised to more effectively identify and share information on homeless students with local education agencies (LEAs) and support them in meeting the needs of these students.

Beginning in the 2016-17 school year, OSSE will provide comprehensive data on homeless students to LEAs with the expectation that the Family Educational Rights and Privacy Act (FERPA) still applies to this sensitive information. Access to this information should be limited to only those who require it for legitimate educational purposes.

Data Collection and Reporting Details

Collection

As illustrated in Figure 1, OSSE receives data on homeless students through two main sources:

- **McKinney-Vento (MKV) Application:** Students are identified as homeless in the MKV application if a student is marked as homeless in a DC Public Schools (DCPS) or public charter LEAs' student information systems (SIS). Most LEAs send OSSE homeless identifications, nighttime residency status, and unaccompanied youth status via the nightly feed from their SIS. There are a few remaining LEAs who provide nighttime residency status and unaccompanied youth status from their SIS via manual data entry. This information is captured in the MKV application.
- **TCP Monthly Data Feed:** TCP sends a monthly feed of individuals who have interacted with their services during the previous month and have provided consent to share this information with OSSE. OSSE uses these data to identify which individuals are homeless and, when possible, also identify nighttime residency status and unaccompanied youth status. Beginning in January 2015, TCP began sending data from their prevention sites, which significantly expanded the universe of clients about whom OSSE received data.

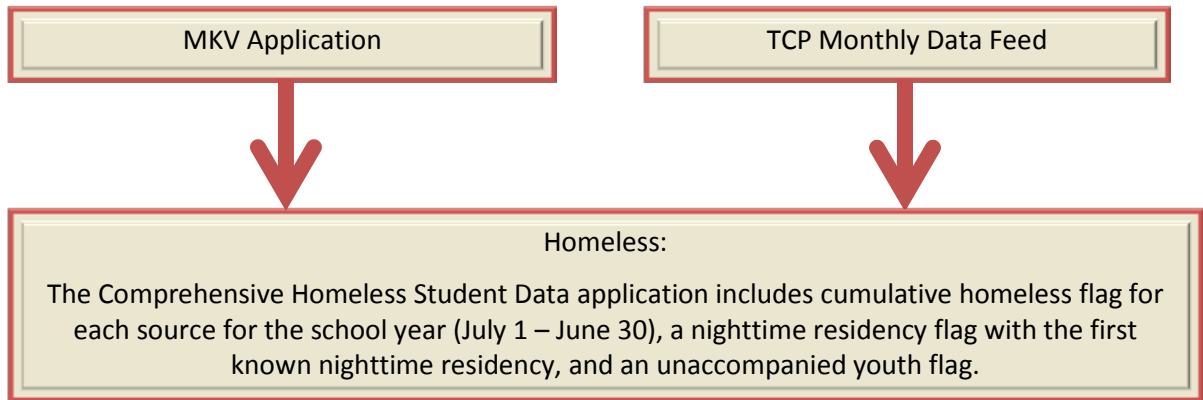


Figure 1. Data sources OSSE uses to identify homeless students

The MKV application provides the means by which schools and LEAs can identify the students they know are homeless and should have access to services and supports. A limitation of these data sources is that schools must be notified that a student is homeless by a student or family member self-reporting this information.

The TCP monthly data feed is provided directly to OSSE and captures information regarding families who are receiving services from homeless shelters, as well as other programs supporting homeless individuals and prevention sites, and have given consent to share this information for school supports. This data source identifies more students as homeless and does not rely on active disclosures from families to schools. OSSE’s sharing of information on homeless students received through the TCP monthly data feed allows schools to identify and provide supports to students identified as homeless in a more timely manner. Under guidance from OSSE’s Homeless Education Office, each homeless liaison is expected to reach out to families who have been identified as homeless by the TCP feed to notify them of additional educational supports, such as transportation assistance and school uniforms, which the school can provide. OSSE is one of the only state education agencies to receive information on which students are homeless from a source outside of schools, which is significant as this coordination and data sharing can have a dramatic, positive impact on the educational experience of homeless students.

OSSE Reporting

OSSE provides information on homeless students to LEAs in four ways. The following descriptions summarize the purpose and limitations of homeless data reported to LEAs:

- **Direct certification:** The Direct Certification module in the Statewide Longitudinal Education Data (SLED) system provides limited information on homeless students for the purpose of identifying students who qualify for free/reduced lunch. This list is populated by the TCP data feed and only identifies homeless students who are not otherwise identified as receiving Temporary Assistance for Needy Families (TANF) or Supplemental Nutrition Assistance Program (SNAP), or a ward of the state. This module should only be used for this purpose because the information is not comprehensive.
- **Enrollment audit:** The Enrollment Audit module in SLED provides comprehensive data on homeless students as of Oct. 5. This module is populated by the MKV application and the TCP

data feed. Because this information is only accurate at a moment in time, it should only be used for the at-risk indicator as it relates to the enrollment audit and funding.

- **MKV application:** This application houses information reported by schools and LEAs on which students are homeless. It only includes information on students who have been self-reported as homeless. Homeless identifications and nighttime residency statuses that are sent via the SIS are stored in this application. Additionally, schools can use the application to make note of services that students need and contact information for students.
- **Comprehensive Homeless Student Data application:** This new report provides comprehensive information on homeless students, including the means by which they were identified. It includes data from the McKinney-Vento application and the monthly feed from TCP that is updated approximately the first week of the month and can be used by homeless liaisons and LEA data managers to coordinate services and support to homeless students. Due to the sensitive nature of this information, access will only be provided to LEA homeless liaisons and data managers.

Appendix A: Homeless Data Governance

OSSE is legally mandated to collect and report homeless data. This sensitive information will be governed in the following ways. Any changes to these processes will be informed by data governance best practices and feedback from external stakeholders.

Data Storage and Access

- Homeless information housed in SLED in the Direct Certification and Enrollment Audit modules is limited to SLED users who have been trained on the application and have signed assurances that they will maintain the confidentiality of students' personally identifiable information. Anyone with access to this sensitive information is advised that they should not access this information for any other purpose and must affirm this each time the information is accessed.
- Access to information on students who are homeless in the Comprehensive Homeless Student Data application is limited to LEA homeless liaisons and LEA data managers.
- Access to self-reported information on homeless students in the MKV application is limited to homeless liaisons and LEA data managers.

Data Use

- FERPA applies to this sensitive information and access must be limited to those with a legitimate educational interest.
- Users of each of the identified modules receive student privacy training and sign a form that attests that they will protect student privacy and only use the information for legitimate educational purposes.
- To the extent capacity and policy alignment allows, OSSE will fulfill other aggregate data requests to inform the development of policy and to support services.

Business Rules

To identify homeless students, OSSE applies the following business rules:

- Homelessness is defined by the US Department of Education as "individuals who lack fixed, regular, and adequate nighttime residence" and is cumulative throughout the school year (July 1-June 30), meaning that if a student is homeless for even one night of the school year, he or she is considered homeless for the entire school year:
 - Possible nighttime residency statuses are Hotel/Motel, Unsheltered, Sheltered, or Doubled-Up.
 - Unaccompanied youths are those homeless individuals who are less than 24 years and nine months old at the beginning of the school year and are not in the physical custody of a parent or guardian.
- For students identified as homeless by their school, their nighttime residency status and unaccompanied youth status are what the school reports.
- For students identified as homeless by TCP:

- Identification: Students are identified as homeless if they report during intake that they were homeless before arriving at the provider, if they report during their exit interview that they will be homeless when they leave the provider, or if they interact with a provider that exclusively serves homeless clients (i.e. a homeless shelter or the hypothermia hotel/motel program). TCP has confirmed which providers exclusively serve homeless clients.
- Nighttime Residency: Nighttime residency is derived, when possible, from the client's self-reported living situation before program entry, their provider, or their exit destination. TCP has verified which providers indicate nighttime residency status.
- Unaccompanied Youth: Unaccompanied youth status is derived if the client is being served at a provider which TCP has confirmed serves exclusively unaccompanied youth or if the client reports that they are head of household and is less than 24 years and nine months old at the beginning of the school year.
- The nighttime residency status collected by the school supersedes the nighttime residency status derived from TCP data.
- Students identified as unaccompanied youth either by the TCP data or the school are considered unaccompanied youth.