



Strategies to Improve Data Collection on New York's Homeless Students

A Report to NYS-TEACHS and the New York State Education Department



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This study is dedicated to all students with no place to call home.

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Introduction

This report is designed to assist New York State in improving the accuracy and efficiency of data collection on homeless students. Toward this end, we suggest shifts to achieve better identification of homeless students, improved tools and systems for collecting data on homeless students, and collaboration and training to widen knowledge about federal and state legislation protecting homeless students.

The federal McKinney-Vento Homeless Assistance Act and New York State Law Section 3209, which broaden the definition of homelessness to include those students living doubled up due to loss of housing or economic hardship, make obtaining accurate counts a matter of law. This emphasis on identifying individual school children and youth experiencing homelessness is directed to ensuring that homeless students do not experience barriers to attending school and that all homeless students, including those living doubled up with a friend or relative, receive the services to which they are entitled.

Yet, obtaining reliable counts of homeless students has been a serious problem for schools and districts throughout the country. For example, the Massachusetts Department of Education (2006) found that official counts of all homeless high school students amounted to only 14 percent of the likely total. Although schools often receive information on families in local shelters, this represents a relatively small proportion of those who apply for shelter (Mowry 2006) and does not include those who find a range of temporary housing, from motels and bus stations to the couches of friends or relatives. According to Mary Cunningham and Meghan Henry (2007), in January 2005, 61,094 people in urban and rural communities in New York State experienced homelessness, or 0.32 percent of the state population. Of those reported as homeless, 81 percent were living in shelters and transitional housing, and 19 percent were unsheltered. The analysis followed the U.S. Department of Housing and Urban Development (HUD) definition, rather than the definition promulgated by McKinney-Vento, and did not include families living doubled up.

Figure 1 on page 2 shows those districts in New York State that enroll over fifty homeless students. We also show the percent of students identified as living in shelters or doubled up in these districts.

As Figure 1 makes clear, Syracuse, White Plains, and Bayshore report that 100 percent of all homeless students are in shelters. Since most districts serve some runaway youth and students living doubled up, it is unlikely that *all* homeless students in these districts are in shelters. In addition, a range of districts, including Yonkers, report *no* students living doubled up, also extremely unlikely.

Homeless liaisons in New York State, who are responsible for homeless students in their districts, believe they are not identifying *all* homeless students. In a survey administered in spring 2007 at workshops for New York's homeless liaisons in New York City, Albany, and Rochester, we asked liaisons whether they believe counts of students living in a variety of homeless situations are reliable in their districts. As Figure 2 on page 3 suggests, less than

Figure 1. Districts reporting over fifty homeless K–12 students, Basic Education Data System (BEDS) 2005-2006 data

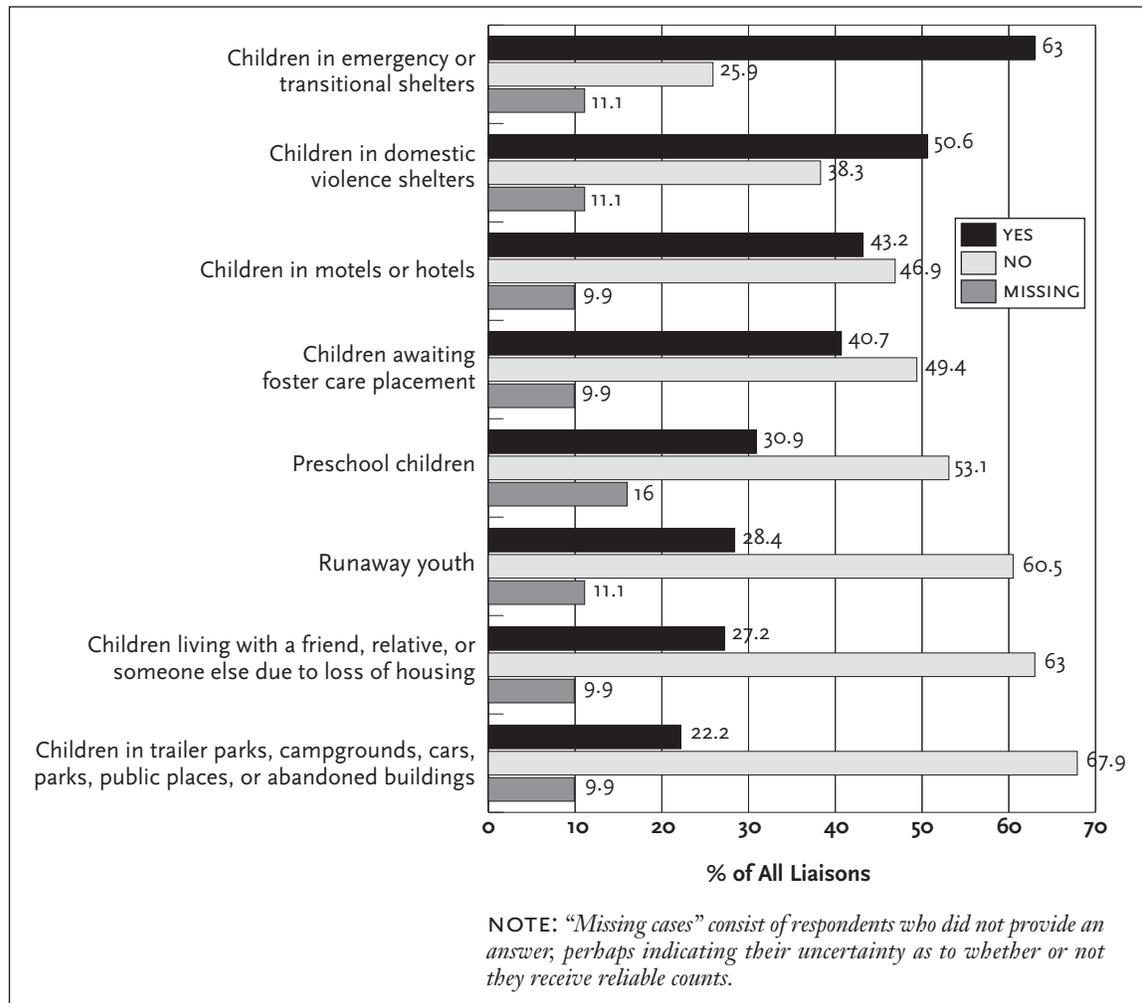
District Name	Total Homeless K–12	% in Shelters	% Doubled Up
New York City	9061		
Hempstead Union Free School District	630	6.35	87.30
Rochester City School District	505	64.36	20.79
Niagara Falls City School District	276	7.25	92.75
Buffalo City School District	244	37.70	58.20
South Country Central School District*	212	75.47	0.00
New Rochelle City School District	200	32.50	67.00
Greenburgh Central School District	172	46.51	53.49
Longwood Central School District*	166	54.22	42.17
William Floyd Union Free School District*	162	25.93	74.07
Mamaroneck Union Free School District	138	2.17	0.00
Yonkers City School District	136	16.91	0.00
Newburgh City School District	130	13.85	76.15
Brentwood Union Free School District*	127	79.53	0.00
Wyandanch Union Free School District	111	69.37	0.00
Albany City School District	102	46.08	17.65
Hudson City School District	100	13.00	20.00
Port Chester-Rye Union Free School District	88	3.41	86.36
Bay Shore Union Free School District*	87	100.00	0.00
White Plains City School District	83	100.00	0.00
Central Islip Union Free School District*	80	91.25	8.75
Port Jervis City School District	79	0.00	70.89
Mount Vernon City School District	73	57.53	13.70
Carmel Central School District	70	44.29	0.00
Valley Central School District (Montgomery)	69	2.90	73.91
Hoosic Valley Central School District	68	0.00	38.24
Union Free School District of The Tarrytowns	67	1.49	98.51
Syracuse City School District	60	100.00	0.00
Kenmore-Tonawanda Union Free School District	59	0.00	89.83
Farmingdale Union Free School District	55	45.45	45.45
Middletown City School District	53	15.09	0.00
Sachem Central School District	51	86.27	13.73
Hudson Falls Central School District	50	2.00	76.00

SOURCE: Basic Education Data System, New York State Education Department (n.d.), *Information and Reporting Services*; data received from NYS-TEACHS at Advocates for Children

* Asterisked districts are named in the 2004 Consent Decree (see pages 6-7 for more information on the Decree). In addition, several Consent Decree districts have identified fewer than fifty homeless students: North Babylon (37), Middle Country (37), Amityville (37), Riverhead (30), South Huntington (9), and Hampton Bays (3).

two-thirds of homeless liaisons (63 percent) are confident of their counts of students in emergency or transitional homeless shelters – situations in which obtaining counts is generally the most routine. Only about half of all liaisons believe they receive reliable counts of students in domestic violence shelters, which is more understandable, since most of these shelters are extremely concerned about confidentiality and maintaining the safety of their residents.

Figure 2: Do you receive reliable counts on the following groups of homeless students eligible to attend school in your district? (Total sample: N=81)



Still fewer liaisons – just over 40 percent – believe that they receive reliable data on children in motels or hotels or who are awaiting foster care placement, and less than a third would vouch for the reliability of their data on preschool-aged homeless children. Liaisons express the greatest uncertainty about counts of runaway youth, children living doubled up with a friend or relative, and children in trailer parks, camping grounds, public places, and abandoned buildings. For these groups, who are often not connected to social service agencies

and have been called “the hidden homeless” (Terrazzano 2004), only about a quarter of all respondents are confident of their data.

Our research, conducted during spring 2007, was designed to understand what strategies might lead to more accurate data on homeless students in New York State and so, also, to greater liaison confidence in the data they report. Several research methods were employed to develop our findings:

- a review of national and state laws and regulations requiring the collection of data on homeless students in New York State;
- an analysis of district and state data-collection tools and systems in New York State;
- telephone and face-to-face interviews conducted with state officials, district homeless liaisons across the state, staff members of the National Center for Homeless Education, and representatives of a range of state and local agencies that service homeless students;
- a voluntary survey administered to liaisons attending workshops in New York City, Albany, and Rochester;
- participation in meetings of the New York State Homeless Advisory Committee, convened by the New York State Education Department.

This report presents findings and recommendations to the New York State Education Department (NYSED), based on our research. The report describes the current legal context for collecting information on homeless students in New York State, as well as current state and district data-collection practices. The findings and recommendations focus on three areas of potential improvement: better identification of homeless students; data-collection instruments that provide greater confidentiality; and increased cross-agency communication and collaboration. Two appendices present data requirements and current data collection tools, as well as a sample of geo-coded data on families requesting shelters.

The legal context for collecting information on homeless students in New York State

The process for identifying and reporting homeless students used by the NYSED is structured by the federal McKinney-Vento Homeless Assistance Act of 2001, New York State Education Law Section 3209, and the 2004 Consent Decree (see page 6) between the National Law Center on Homelessness and Poverty and the NYSED. Each of these sources of authority has placed responsibility on the NYSED, as well as the individual school districts or local educational agencies (LEAs) it oversees, to collect and report accurate data on homeless students as part of serving the educational needs of these students.

The federal McKinney-Vento Act, reauthorized in 2001 as part of No Child Left Behind, begins with the definition of homelessness promulgated by HUD in defining homelessness as lacking a “fixed, regular, and adequate nighttime residence.” Included are those living in

motels, hotels, trailer parks, bus or train stations, or emergency shelters, or whose nighttime residence is a public or private place not designed for ordinary use as a regular sleeping accommodation fit for human use.

If children and their families living in most of these situations are difficult to identify, McKinney-Vento broadens the HUD definition of homelessness and so, also, the difficulty of identification, by including all children and youth who are doubled up or share the housing of others due to loss of housing or economic hardship. These students and their families generally do not see themselves as homeless (they have a roof over their heads), and many are afraid of placing their friends or relatives at risk with a landlord if it is discovered that two or more families are living at the same address.

McKinney-Vento also mandates a range of responsibilities, including data collection, for both states and districts or LEAs. These are meant to ensure that the educational rights of each homeless student are upheld.

Federal law defining LEA responsibilities

Every LEA must maintain any record ordinarily kept by the school (including immunization or medical records, academic records, birth certificates, guardianship records, and evaluations for special services or programs) regarding each homeless child or youth so that the records are available, in a timely fashion, when a child or youth enters a new school or school district. Every LEA must also appoint an appropriate staff person to act as a liaison for students in homeless situations. Among the liaison's mandated responsibilities is another key data-collection role: the liaison must identify children and youth in homeless situations in their LEA.

In addition, the McKinney-Vento sub-grant funds (provided to states to be awarded to selected districts, based on need) add reporting responsibilities for funded districts.

McKinney-Vento sub-grant recipients must report:

- number of homeless students served by the sub-grant;
- number of subpopulations of homeless children and youth (preschoolers, unaccompanied youth, migrant children/youth, children with disabilities (IDEA), limited English proficient students, gifted and talented);
- services and activities funded by the McKinney-Vento sub-grant;
- barriers to the education of homeless children and youth (eligibility, school selection, transportation, school records);
- academic progress of homeless children and youth.

Between 2004 and 2006, the NYSED collected these data using a contracted survey, LOUISE (Liaisons Online Unified Information System for Evaluation). Currently, the NYSED is considering the collection of information required of McKinney-Vento sub-grantees using a survey developed by the National Center for Homeless Education.

Federal law defining state responsibilities

States are responsible for collecting data on homeless students from their districts and reporting this data to the federal government. As of 2006-2007, all state education departments must report to the U.S. Department of Education:

- number of homeless children and youth enrolled in public school, by grade level;
- type of primary nighttime residence used by homeless children and youth (e.g., shelter, doubled up, unsheltered, hotels/motels).

As of 2005, New York State's Basic Education Data System (BEDS) collects this information; however, the data has varied widely.

In addition, states must report district-level data for those districts receiving McKinney-Vento sub-grants, as described on page 5.

New York State Education Law Section 3209 provides for the education of homeless children in New York State. Among its requirements are that "Each school district shall collect and transmit to the Commissioner, at such time and in such manner as the Commissioner may require, a report containing such information as the Commissioner determines is necessary to assess the education needs of homeless children and youth in the state." Until now, New York State's data requirements have been structured by federal mandates and by the Consent Decree described in the next paragraph.

In the 2004 lawsuit *National Law Center on Homelessness and Poverty v. New York State Education Department*, the NYSED and fourteen public school districts in Suffolk County on Long Island were sued for depriving homeless children of access to a free and appropriate public school education. The Consent Decree between the National Law Center on Homelessness and Poverty and the NYSED (U.S. District Court 2004) contained several agreements concerning data. Most important, the NYSED agreed to capture and analyze the following data on homeless students in the fourteen defendant districts, as well as other "high-need districts and districts with fifty or more homeless families," through the data system LOUISE, then under development:

- number and ages of homeless children within a district;
- percentage of homeless children remaining in their schools of origin;
- length of any enrollment delays;
- average wait for transportation services;
- types of services provided to homeless children;
- attendance and performance of homeless children;
- number of appeals by homeless families, types of disputes, and their resolutions.

While McKinney-Vento leaves it up to states to design the data systems for collecting mandated information, the 2004 Consent Decree specifies that New York State use "both existing state data systems, such as BEDS, and a new state-administered survey, LOUISE." BEDS data captures the number of homeless students, but it uses grade level, rather than ages, as

required by the Consent Decree. With the discontinuation of LOUISE, the remaining data points will likely be captured by a survey being developed by the National Center for Homeless Education. (See Appendix A for a summary of all data requirements and current tools for collecting these data.)

Summary

New York State's collection of data on homeless students is structured primarily by the McKinney-Vento Homeless Assistance Act of 2001 and the Consent Decree of 2004 between the NYSED and the National Law Center on Homelessness and Poverty. While some of the demands of these two legal mandates are being met by current data systems, there is considerable question regarding the accuracy of existing data. Currently, plans are being made to capture detailed data required of McKinney-Vento sub-grant recipients, as well as most of the data required by the Consent Decree, through a survey being developed by the National Center for Homeless Education.

District data collection on homeless students: The problem of identification

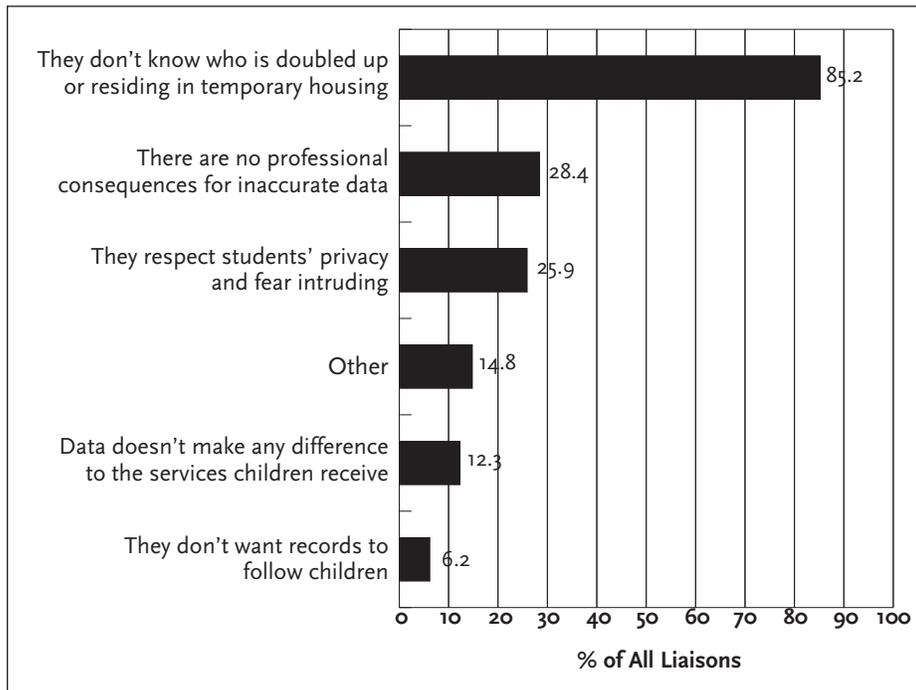
In New York State, as elsewhere, data collection begins when a school or school district identifies a student as homeless. That is, either an educator must take the initiative in deciding that a student is homeless (which has privacy implications, if the student or parent would object to this designation) or the student or student's family must indicate that they are homeless. If the identification has occurred at the school level, the information must be conveyed to the person responsible for reporting these data to NYSED, who is usually the district homeless liaison.

Our survey asked liaisons where they find out about students experiencing homelessness. Respondents were given seven options and allowed to check all that apply. Four out of five liaisons (81.5 percent) reported that they receive their information from school-level personnel, and 72.8 percent said they receive their information directly from students and families. Almost half of liaisons also reported receiving information from social service agencies and/or members of district staff.

What these data do not (and cannot) show are those students experiencing homelessness who never come to the attention of the homeless liaisons. Nevertheless, liaisons suggested these unknown students when they reported problems with the information flow on homeless students from shelters to the district, between the district and student support staff, and across districts serving individual homeless students.

Our survey also asked why school-level personnel, liaisons' primary source of information, may not provide accurate data. Liaisons had the option of choosing from six scenarios and could check all that applied. As Figure 3 on page 8 shows, the vast majority of respondents

Figure 3: Why school-level personnel may not provide accurate data (N=81)



(85 percent) believe that school-level personnel simply don't know who is doubled up or living in other temporary housing. (This finding is similar to that of other cities across the country.)

However, over a quarter of all respondents report that “there are no professional consequences for inaccurate data.” That is, from a job-performance standpoint, it simply doesn't matter to school personnel whether their counts are accurate. Over 12 percent believe that identification doesn't make any difference to services, which suggests that some liaisons or school staff may not be aware of Title I and McKinney-Vento funds targeted specifically to serving homeless students. In New York City, interviewees at both the school and central office levels insisted that students received the same range of Title I services, whether or not they are identified as homeless.

Finally, two categories of responses suggest that school staff may actually believe they are helping students by not reporting accurate data: while almost a quarter of all liaisons report that school personnel “respect students' privacy and fear intruding,” another 6 percent report that school personnel “don't want records to follow students.” That is, given the stigma of homelessness, concern with confidentiality is a factor preventing identification.

To better understand how and where identification occurs, and how this identification is reported to homeless liaisons and translated into data, we conducted extensive interviews in districts of varying size throughout New York State.

Small districts

Small districts of under 2000 students constitute over 60 percent of all New York's districts; however, most have few homeless students and no shelters or community agencies that work with homeless children or families. Thus, according to informants, identification began when a student first arrived at a school to register.

In 2006-2007, the NYSED mandated a Residency Questionnaire in all Title I districts, to be completed as part of the enrollment process. The model Residency Questionnaire offered by NYSED asked two critical questions:

- Is your current address a temporary living arrangement? _____ Yes _____ No
- Is this temporary living arrangement due to loss of housing or economic hardship? _____ Yes _____ No

If the answers to both questions were *yes*, the questionnaire offered respondents the opportunity to specify among a range of temporary arrangements listed in McKinney-Vento legislation.

In small districts, when a student's answer to the questionnaire revealed that the student's housing was temporary, the school generally notified the district homeless liaison, who met with the parents and/or the student to ascertain if the student was, in fact, homeless as defined by the McKinney-Vento legislation, and communicated the students' rights and entitlements. The liaison also completed a STAC-202 form for each homeless student. (STAC-202 forms, developed by the NYSED, facilitate tuition reimbursement for homeless students who were last permanently housed in different districts and are temporarily attending school in the local district.) This process was most likely to be hitch-free in those districts with central registration, because district registrars tended to be more knowledgeable about McKinney-Vento legislation than were school-level registrars.

Identifying students who become homeless after they are already enrolled in a school was more difficult, because homeless liaisons relied on school-level personnel – first, to learn about a child's housing situation, and second, to bring it to their attention. Nevertheless, in small communities with a good deal of stability, people are likely to know when a house burns down, a family is evicted, a parent moves her children in with relatives, or a teenager runs away from home, and the liaison was generally confident about knowing who was homeless.

Recordkeeping in small districts with few homeless students was simple. Homeless liaisons tended to keep the completed STAC-202 forms in a binder or file folder in a locked cabinet. When the district needed data on homeless students for the BEDS questionnaire or for other data reporting, the homeless liaison simply counted the number of STAC-202 forms. Despite informal knowledge about people's circumstances in these communities, liaisons generally stressed that keeping paper copies under lock and key until the moment of aggregating data provided privacy in the critical area of records.

Larger districts

The process was more complicated in larger school districts like Rochester, Newburgh, or Syracuse, with high student mobility, more frequent staff turnover within schools, and greater numbers of homeless families. Homeless liaisons in these districts viewed identification as the biggest problem, but hoped the new Residency Questionnaires they were implementing would help in this effort.

Identification usually worked more smoothly when the district had central registration, and the process was facilitated when the registrar was also the district homeless liaison. In districts without central registration, liaisons reported that school personnel were often not familiar with McKinney-Vento legislation and that despite clues that a family might be living in temporary housing, school personnel were often reluctant to “intrude” with sufficient personal questions to determine whether or not the child was homeless.

Finally, some homeless liaisons reported encountering problems with district registrars or other administrators who resisted enrolling a homeless student on the assumption that the student would bring down the district’s test scores and be expensive to educate. Districts were especially concerned about transportation costs for students who become homeless and move away but want to continue attending the same school.

As in smaller districts, homeless liaisons in larger districts reported difficulty identifying students who became homeless after they were enrolled in a school. A lack of familiarity with McKinney-Vento legislation among school personnel; inattention to, or poor information on, a student’s changed housing situation; and a reluctance to inform the district homeless liaison when they suspect that a student has become temporarily housed, were all factors impeding identification.

However, liaisons in larger districts were more likely to report working closely with local agencies that run homeless shelters. These agencies typically keep the school district staff informed of school-aged children living in shelters or other temporary housing (agencies running domestic violence shelters are often an exception). It is important to note, however, that the McKinney-Vento definition of homelessness is broader than that used by agencies running shelters, so records from these agencies, even if forthcoming, under-represent the actual number of homeless students. While some districts understood this distinction, not all did.

Once a student was identified as homeless, recordkeeping and data-reporting systems, even in districts with as many as 20,000 students, tended to be similar to those employed in smaller districts. The homeless liaison completed a STAC-202 form for each homeless student, kept the forms in a file folder, and counted them when asked to report the number of homeless students for local or state data systems.

In larger districts, data on homeless students was sometimes entered into the district’s central data-management systems and retrieved when needed for reporting to the NYSED. Automation made recordkeeping and reporting easier but also raised concerns among school and

district personnel regarding confidentiality. Some liaisons reported that families living doubled up or illegally in an apartment were reluctant to disclose their situations. Said one:

Most families who are homeless are very resistant to disclosing more information. They go through so many systems that don't respect their privacy that they're resistant to disclosing more. On a one-on-one basis, you can hear anything but, for a database, people are afraid of how the data will be used. Also a lot of illegal families aren't going to want to be in a database.

Staff at social service agencies also expressed confidentiality concerns. One staff member said, "Our Department of Social Services is refusing to complete STAC-202 forms on children that are in DV [domestic violence] shelters because there is a belief that there is going to be some kind of paper trail – that someone will see the STAC form and know where the child is living."

New York City

Identification, data collection, and reporting are most problematic in New York City, where the public school system serves over a million students. Moreover, with over 1,400 schools and more than 10,000 *reported* homeless students, a series of restructuring initiatives has left the city with two to three homeless liaisons for each borough and two liaisons for districts 75 and 79.

Homeless students are identified primarily through the Students in Temporary Housing (STH) Program, established in the 1990s to track school-aged children and youth living in Department of Homeless Services (DHS) family shelters. Approximately 120 family assistants – paraprofessionals hired by the NYCDOE – are assigned to work in over 170 DHS family shelters, Scatter Site apartments, and domestic violence shelters located throughout the city. Family assistants interview all parents of school-aged children within twenty-four hours of their arrival in the shelter and complete a Family Intake and Move Out Record, which contains much the same information as the STAC-202 form, not used in New York City.

Once a week, family assistants deliver the completed Intake and Move Out forms to their supervisors, the STH Content Experts in the borough offices, who are also homeless liaisons. These Content Experts/liaisons enter the information into ATS, the public school automated student data system, where the student's status is flagged as STH (student in temporary housing). When the student moves into permanent housing, the flag is removed from the current records but remains in historical records, available for research and reporting purposes.

Despite McKinney-Vento's broader definition of homelessness, New York City's system for identifying homeless students focuses on students living in DHS family shelters.¹ Moreover, even students in shelters appear to have been under-identified. In 2004-2005, DHS identified 19,328 children,

¹ No New York City public school principal we interviewed was familiar with the McKinney-Vento legislation. All knew that they had to enroll homeless students without proof of immunizations, or other documents, but some maintained (incorrectly) that in order to enroll a student, parents had to have proof of residence or a letter from STH, DHS, or another agency documenting that the family was homeless.

all of compulsory school age, residing in the family shelter system, while the New York City Department of Education (NYCDOE) only reported 14,787 students in temporary housing. No reason for the discrepancy of nearly 5,000 homeless students has been offered. (Advocates for Children 2006).

The under-identification of homeless students in New York City is exacerbated by the fact that students in domestic violence shelters, runaway and homeless youth shelters, transitional living programs for runaway and homeless youth, and shelters for single adults (including youth who may be enrolled in public school) are not systematically identified by the STH program.

In 2006-2007, hoping to establish a baseline, the NYCDOE distributed its version of the newly required Residency Questionnaire to all public school students to take home, be filled out and signed by a parent or guardian, and be returned. NYCDOE officials report that they received “a good response rate,” but could not give us further details. However, documents handed out in this way traditionally have low response rates, with the lowest response rates among fragile low-income families. In the future, the Residency Questionnaire is to be completed for all new students as part of the school enrollment process and by all entering ninth-graders. The plan is to have students who indicate that they are living in temporary housing referred to the STH Content Expert, who will complete an Intake Form.

Until now, reporting data on homeless students to the NYSED has also been decentralized, with responsibility for reporting different data located in different NYCDOE offices. The BEDS report has been completed by the Central Office of Assessment and Accountability. Between 2004 and 2006, when LOUISE was operative, it was completed by the STH Content Experts for each of the twenty-eight funded community school districts, District 75, the city-wide district for special education students, and District 79, the citywide district for Alternative Schools and Programs. None of the NYCDOE central office staff we interviewed, including the Coordinator of STH Content Experts/homeless liaisons, was knowledgeable about data issues, including the Student Information Repository System (SIRS) under development by the NYSED.

Despite receiving training in McKinney-Vento, interviews with staff in District 79 (recently restructured) suggested that although a number of programs in the district are directed to homeless youth, staff members generally would not try to find out if a student is homeless. A high-ranking administrator confessed, “I grew up in very difficult circumstances in the Bronx, and I don’t know, if I were living in a car, if I’d be so ready to tell anyone that.” Indeed, it was reported to us that instead of distributing the Residency Questionnaire to students to complete, some administrators in District 79 schools opted merely to post information on how to reach the homeless liaisons and invited any students who needed transportation passes, lunch money, clothing, school supplies, or other assistance to contact them.

Our interviews also suggest that New York City school-level personnel outside District 79 are reluctant to identify a student as being homeless by flagging them in the ATS system or informing the NYCDOE homeless liaison. While they would link the family to appropriate

services, they posited that there were no additional benefits available to students identified as homeless, and they didn't want to flag students with a stigmatizing label that could later be used against them.

For parents, there are many reasons to avoid disclosing homelessness, including the stigma; a belief that a changed address might force their child to change schools; and a fear, if they are living doubled-up in public housing, that the primary tenants may be at risk of losing their housing. Some parents in very low-income communities are also afraid that their children will be taken away from them if it becomes evident that their housing is substandard or overcrowded. Undocumented immigrant parents, who often live doubled up, fear bringing any attention to their whereabouts.

Summary

Identification is the critical problem at the district and school levels, and data on homeless students does not evoke a high level of confidence among homeless liaisons. Liaisons are the most confident about counts of students in emergency or transitional homeless shelters and least confident about counts of the “hidden homeless” – runaway youth, children living doubled up, and children in trailer parks, camping grounds, public places, and abandoned buildings. Knowledge of McKinney-Vento is spotty in local schools, and in some districts – including New York City – principals seem unaware of the rights of homeless students accorded by the legislation. However, inaccurate data emanates not only from an ignorance of McKinney-Vento, but also from a lack of accountability and from respect for students' privacy. Indeed, some school and district educators deliberately do not identify students as homeless, believing that privacy risks outweigh any potential services. In addition, mechanisms for reporting homeless students in New York City appear to be unstable as a result of structural changes in the NYCDOE.

State data collection: Improving data-collection instruments to create greater confidentiality

Districts use two major instruments to collect information on homeless students: an Enrollment Form, also called a Residency Questionnaire, and a STAC-202 form, designed for tuition reimbursement. Information from these data-gathering tools is entered into one or more of several state-level data systems. Below, we review each of these tools and data collection systems.

Tools for data collection in New York State

New York State Law Section 3209 and the New York State Commissioner's Regulations Concerning the Education of Homeless Children [8 NYCRR §100.2(x)(3)] mandate that school districts use a Designation Form to identify students who are homeless.

Until now, the state has not disseminated a separate Designation Form for districts to use. Thus, to meet state requirements, the NYSED has used the STAC-202 form, issued by the System to Track and Account for Children (STAC) office at the NYSED. The primary purpose of this form is to facilitate tuition reimbursement for homeless students who were last permanently housed in a different district and are temporarily attending school in the local district. While the STAC-202 form is to be signed by the parent or guardian and completed by the district when any child enrolled in the school district is discovered to be homeless, the form is only to be sent to NYSED when the district is entitled to reimbursement.

Public school administrators and homeless liaisons found the STAC-202 form confusing and disliked it for several reasons. First, it is one of the few paper forms left in the public school system; educators are increasingly accustomed to working online. Second, most homeless students are not in situations in which the district is entitled to reimbursement, and so the main purpose of the form is irrelevant. Third, homeless parents or guardians are wary of making a legal statement about their housing difficulties and are reluctant to sign the STAC-202 form. In fact, because its sole purpose is for reimbursement, *some districts simply do not fill out the STAC-202 form* if issues of reimbursement do not apply, and they therefore have no backup when asked to report the number of homeless students in the district.

Beginning in 2006-2007, in response to presumed under-reporting of homeless students, the NYSED has required that school districts receiving Title I funds implement a Residency Questionnaire, also called an Enrollment Form. Intended simply to identify those students experiencing homelessness, Residency Questionnaires are to be completed by parents or guardians as part of the school registration process.

The NYSED offered districts a model Residency Questionnaire and suggested that districts customize the forms to suit district needs. Of the Residency Questionnaires we reviewed, all ask several basic questions: student's name, date of birth, gender, school, and grade level. In addition, all ask the critical question about what is generally called "temporary housing," and some ask whether this is due to economic hardship or the loss of housing. While the tactful euphemism, "temporary housing," avoids the stigma of homelessness, the meaning may not be clear to a poorly educated or immigrant parent.

Residency Questionnaires vary in their tone, style, detail, and friendliness to respondents. While Newburgh's form explains to parents that if they indicate that they are in "temporary housing," they will be entitled to extra services, New York City's residence form only tells parents that admitting to being in temporary housing "cannot cause them to be discriminated against" and makes no mention of additional services to which they may be entitled.

Since privacy and confidentiality are concerns among parents and guardians, we examined the Residency Questionnaire to see how districts handled this issue. While all explain that the information is confidential, some forms make clear at the bottom that copies of the form are to be sent to food and nutrition services, social services, Title I personnel, and school data-entry staff, presumably to be included in the student's cumulative record. This is not

necessarily a breach of confidentiality, but the form should make clear how confidentiality is protected by sharing information on a need-to-know basis.

Some Residency Questionnaires clearly respond to the privacy concerns of homeless families. In a prominent place, they warn the liaison or registrar: “Schools must keep original forms separate from student permanent record” or “Do not retain in student education record. Forward to homeless education liaison via fax.” In other words, the assurance at the top of the form that the information is confidential is re-stated and reemphasized by the instructions at the bottom. It is important to note that these districts are not precluding the sharing of information with educators within the district on an as-needed basis; however, they *are* making clear that the information is not part of the students’ record.

Some districts have also enriched the Residency Questionnaire with other information to be filled out by the district, making this form provide the additional information necessary for compliance with McKinney-Vento. For example, Brockport’s Residency Questionnaire turns into a Tracking Form on the reverse side, which enables the district to track all services provided to students. Combining the Residency Questionnaire with a Tracking Form means that the information can still remain confidential by being kept in the liaison’s office to be shared on an as-needed basis only with those educators or representatives of social service agencies who are working with the student.

NYS-TEACHS has recently recommended that the NYSED implement revised versions of the Residency Questionnaire and the Designation Form. The revised residency form simply asks where the student is currently living and allows the respondent (parent, guardian, or student) to check either one of the critical McKinney-Vento categories of temporary housing (in a shelter, with another family, etc.) or permanent housing. If the respondent checks one of the categories of temporary housing, he or she is then to complete a Designation Form, which is kept on file in the district where the student attends school, separate from the student’s permanent record. The Designation Form asks for information on possible enrollment delays, possible barriers to enrollment, school of origin, other schools previously attended, and possible disputes that have previously occurred between the student/guardian and the district or the NYSED regarding McKinney-Vento. As NYS-TEACHS has suggested, separating designation issues from reimbursement and using the STAC-202 form for reimbursement only will result in less confusion among district staff.

Systems for data collection in New York State

Over the past several years, three major data systems in New York State have included information on homeless students. BEDS, developed in 1968 by the NYSED’s Information Center on Education, contains statistical data on every school building, local school district, and intermediate district (BOCES, or Boards of Cooperative Educational Services) in New York. BEDS is a flexible system, and new questions can be added on a temporary basis to meet the state’s needs.

The BEDS system consists of two files: an Institutional Master File (IMF) with data on pupils and facilities (both public and private) in each school district and BOCES, and the Personnel Master File (PMF), with statistical data on the demographic and professional characteristics of public school professional staff and their job assignments.

BEDS data is collected annually, on October 15. Most data in the BEDS files – for example, student enrollment – are entered as of that date. However, a few data points asked in BEDS – attendance, suspensions, student stability, and the number of homeless students – are asked as cumulative totals for the preceding year. Liaisons and other informants reported uncertainty about how the data on homeless students was to be counted, and several said that they had given point-in-time, rather than cumulative, counts of homeless students in their districts, which may easily have contributed to undercounts.

LOUISE was under development at the time of the 2004 Consent Decree. The survey, which was administered by a private contractor between 2004 and 2006, was completed electronically by all homeless liaisons in New York. LOUISE included a short form for all districts and a long form for McKinney-Vento sub-grantees that expanded on those questions required by McKinney-Vento legislation. Liaisons in sub-grantee districts complained that the survey was extremely long; that they often didn't have the information needed to answer questions; that some questions were duplicative of other data systems; and that no feedback or analyses of their responses to LOUISE were ever provided. Perhaps because of confusion between point-in-time and cumulative counts, the number of homeless students yielded by BEDS and LOUISE varied by as much as 50 percent (Ascher & Phenix 2006).

Finally, New York State has initiated a new online student-based system, SIRS, based on individual student records, with a unique student ID that can follow all students from pre-K through grade 12. Now being piloted in grades 3–8 in several districts, data for SIRS will come from existing district data-management systems that aggregate school data. This district-level data will then be sent to one of thirteen Regional Information Centers; the Big Five school districts – New York City, Albany, Buffalo, Syracuse, and Rochester – will have their own repository. From there, data will be sent to a single statewide data warehouse, where all K–12 student data will be aggregated.

Statewide data, which include student names and unique identifiers, will be available only to users with legitimate educational interests. Finally, NYSED's statewide data warehouse will be used to meet state and federal reporting requirements. This student-level data will replicate the student records, but student names will be removed and student identification numbers encrypted. This final level will also provide data for the New York State Report Card.

As SIRS continues to develop, NYSED has begun trying to articulate what data should most profitably be collected through BEDS, what through SIRS, and what through a potential third system. During discussions this spring in which we participated with NYSED data experts and the Homeless Coordinator, it was proposed to add two critical questions to the developing SIRS data system:

- Was this student homeless during the year?
- Did this student receive any Title I services?

With these two pieces of information, SIRS has the potential to answer a number of federally required questions on the services provided to, and academic progress of, homeless students. While SIRS contains students' addresses, the database does not include the type of nighttime residence of a homeless student, as required by McKinney-Vento. However, despite encryption at the level of the data warehouse, information on whether a student is living in shelter or a car, or spending the night in a train station, is probably inappropriate in a statewide database that follows each student throughout his or her educational career. Similarly, questions about transportation, appeals, types of disputes, and so on are too provisional and too personal to be part of a student's permanent record in a statewide database and thus should be answered by a separate, confidential system.²

It will take several years before there are usable SIRS data on all students, pre-K-12, for each of the state's 699 districts, as well as BOCES and charter schools. Thus, whatever the decisions made concerning the appropriateness of specific questions regarding homeless students for SIRS, a more immediate approach needs to be undertaken.

Currently, the NYSED is considering the use of a survey developed by the National Center for Homeless Education, using the subscription service keysurvey.com, to conform to federal data requirements. The survey was used by the State of Colorado for two years, and other states are considering its use. The survey can be customized to support the data needs of New York's Consent Decree. However, the National Center for Homeless Education will only provide a raw file of respondent results, and the NYSED would therefore be responsible for all analyses of the raw data.

Summary

Current identification tools in New York State include a STAC-202 form, designed to be filled out by districts seeking state reimbursement, and a Residency Questionnaire, to be used in Title I districts. These two forms duplicate each other in significant part, are confusing to district administrators, and do not collect all the information sought by state or federal mandates.

The two statewide data systems, BEDS and SIRS, provide the data to comply with the McKinney-Vento Homeless Assistance Act in nonfunded districts. At the same time, a separate survey, developed by the National Center for Homeless Education, provides data required of funded and court-ordered districts. Although some new questions could be added to BEDS, and the new SIRS system offers the potential for answering some questions not previously answerable, a number of detailed questions are too provisional and personal to be in either BEDS or a permanent

² It is instructive to compare data collected on homeless students with special education designations, both of which carry a stigma. However, while homelessness for most families is quite temporary, developmental delays and other special education designations tend to be more permanent. Moreover, while the trauma of homelessness may leave permanent scars, the fact of spending time in a shelter or on the street does not lead to a specific educational treatment.

student-identified system like SIRS. While the new survey offered by the National Center for Homeless Education data system appears an appropriate vehicle for obtaining data on questions not available in either BEDS or SIRS, the NYSED will have to find internal capacity for the analysis of the raw data if they choose to utilize the National Center for Homeless Education resource.

Increasing the identification of homeless children and youth through cross-agency communication and collaboration

Only a minority of New York State's over 700 public school districts have one or more social services agencies in the area. Yet these are generally districts in which most of the state's homeless students are enrolled. In New York City, where nearly two-thirds of all homeless students in the state reside, pressures to decrease the number of clients served, a climate of self-protection in these agencies, and a punitive attitude toward clients have all hindered cross-agency collaboration and decreased its potential benefits. Nevertheless, there are examples of cross-agency collaboration in the city and elsewhere in the state, and the NYSED has both assisted and celebrated these developments.

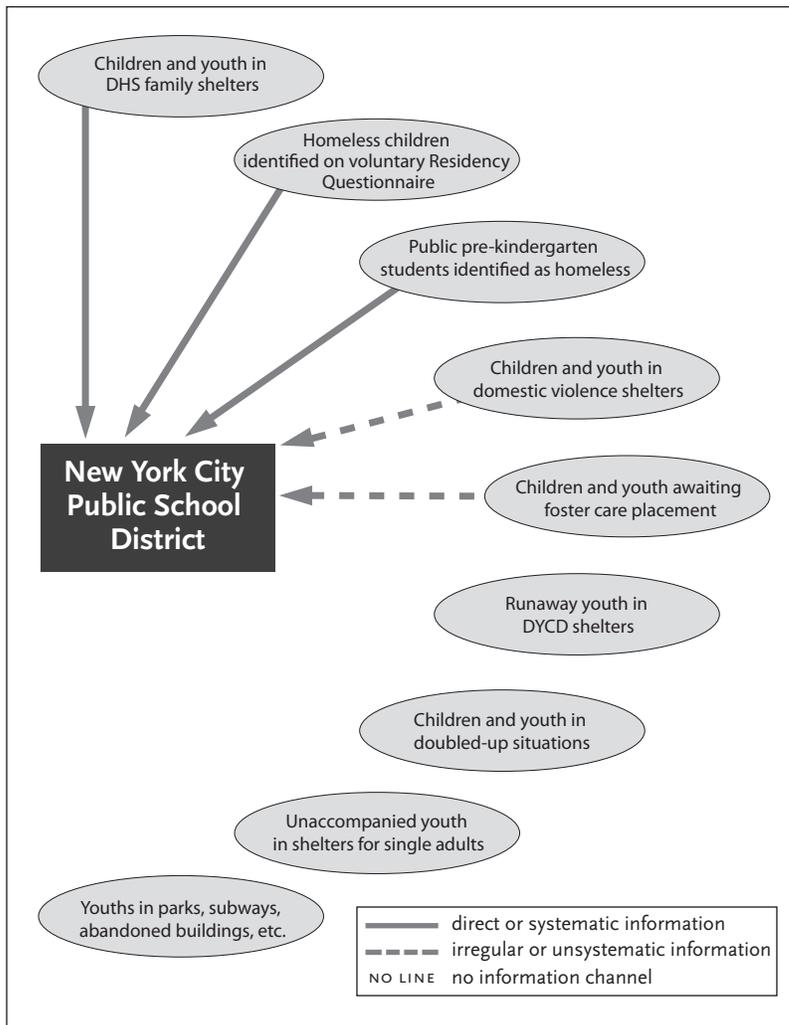
Cross-agency collaboration

A range of agencies involved with homeless students and/or their families could potentially be relied on by public schools to increase identification. Figure 4 on page 19 uses the New York City example to depict different populations of homeless students, whether or not they are connected to agencies, and the regularity of communication to the public school system. Other districts might show a different configuration of communication between the district and shelters or agencies.

As Figure 4 shows, in New York City there are three ways the public school system can receive direct information (a solid line) that a student is homeless: from the DHS, where DOE family assistants collect information on all new admissions of children to family homeless shelters; from a student's or parent's voluntary self-identification during an enrollment interview or on the Residency Questionnaire; and, if the student has been in a public school pre-kindergarten program, from information about homelessness gathered by the enrollment forms in this program. Yet only a small percent of all homeless preschool-age children are in public school pre-kindergarten programs (National Coalition for the Homeless 2006).

Figure 4 also shows that there may be *some* communication (a dotted line) to the public school district concerning students experiencing two other types of homelessness: children and youth in domestic violence shelters and those awaiting foster care placement. In both the domestic violence shelters and foster care systems, the institutions have some – but not certain – lines of communication to the public school system.

Figure 4. Availability of reliable information to the New York City public school system concerning homeless children



As the diagram also makes clear, there is no formal or regular information flow to public schools concerning youth in Department of Youth and Community Development (DYCD) shelters or other unaccompanied youth who may live in shelters for single adults, including those youth who have aged out of foster care or have returned from incarceration.

Nor is any information sent to public schools concerning youth who may live in parks, subways, and other public spaces, although some of these youth may be served by drop-in centers and

other social service agencies and some may be captured by point-in-time street counts. Finally, there is no information on students who have found informal shelter in doubled-up situations, although some students in these situations may appear in pre-kindergarten enrollment information or Residency Questionnaires.

While better communications between agencies serving homeless students and public schools is an obvious strategy to increase information about these children and youth, such a solution demands leadership on the part of the NYSED and NYS-TEACHS, as well as district and agency representatives.

Factors impeding cross-agency communication and collaboration

In New York City, several factors currently make it difficult for representatives of one agency to reach out to and work with colleagues in another agency or in the public schools on behalf of a family or child.

First, the New York City DHS and the Administration for Children's Services, as well as other public agencies that serve homeless families, have been under pressure to decrease their roles and reduce costs (Chan 2007). The result has been that significant numbers of children and youth, including runaways and those awaiting foster care, have been turned away by agencies, or their cases have been closed. Pressure to downsize has also resulted in nervousness among agency representatives about the cost of any solution to filling clients' needs.

Second, agencies have initiated increasingly punitive processes toward homeless and other fragile families. A striking example is provided by the Family Court proceedings and petitions filed by the Administration for Children's Services alleging educational neglect when children have missed school for a significant period. This, in turn, has made these families wary of engaging with public schools or social service institutions.

These factors need not be permanent; but they demand the leadership that NYSED has begun to show, and a concerted collaborative effort by multiple institutions, to turn the situation around.

The Homeless Advisory Committee: An attempt at cross-agency collaboration

In response to the Consent Decree, the Homeless Advisory Committee (HAC) was reconvened by the NYSED in 2004 to focus on issues amenable to statewide policy change. (HAC had existed prior to 2004 but was dormant for several years.) HAC meetings were held quarterly in 2004-2005 and twice a year in 2005-2006; the NYSED and NYS-TEACHS convened monthly meetings of HAC during winter and spring 2007. Spring 2007 meetings were held in NYSED's downstate office in Brooklyn and focused on several critical policy areas related to serving homeless children and youth: sharing data across agencies, developing a common understanding of the conditions under which students awaiting foster care might be defined as homeless, and clarifying the preschool programs available to homeless children.

HAC attendees included representatives of major state and city agencies involved in serving homeless students, including the state agencies NYSED and NYSOCFS, along with the New York City agencies DHS, Administration for Children's Services, Department for Youth and Community Services, and NYCDOE. Although most of these representatives were from New York City offices, interested individuals from other areas, including representatives from the Board of Cooperative Education Services (BOCES) and school districts throughout the state, attended or called in. The Southern Westchester BOCES Homeless Student Program sent materials and a representative to several meetings.

Given the problems of communication and collaboration between city agencies, a New York City group was much needed. Indeed, the problems of agency caution were all evident during

HAC discussions as agency representatives struggled to get to know each other and acquire an identity as HAC members. Monthly meetings in 2007-2008 will be important to further the incipient HAC identity and to create the potential for cross-agency decision making and collaboration.

BOCES as a vehicle for collaborations

There are currently thirty-eight BOCES in New York. Because BOCES cannot levy taxes, all funding comes from grants or payment for services, placing BOCES in a unique position to collaborate with districts in providing services to specific student populations. Moreover, each BOCES has a homeless liaison responsible for providing training and technical assistance to schools and community agencies regarding McKinney-Vento regulations.

Since 2000, Southern Westchester BOCES has operated a Homeless Student Program in collaboration with the Westchester County Department of Social Services (DSS) and the Urban League of Westchester. The program operates in five large school districts – Yonkers, White Plains, Mount Vernon, Greenburgh, and Peekskill, all with high rates of homelessness – and provides a model for BOCES as a vehicle for collaboration. Each of the five districts contributes approximately half of its McKinney-Vento sub-grant to operate the Homeless Student Program. District funds are pooled with those of the Southern Westchester BOCES, which also receives a McKinney-Vento sub-grant directly from the NYSED.

The Homeless Student Program provides a variety of direct services to homeless students, including intensive after-school and summer reading programs and in-school counseling. Program staff also assist the five districts in collecting and reporting data concerning homeless students. Identification of homeless students usually begins when a family registers with a local DSS, where a DSS caseworker completes an intake form and the STAC-202 form and asks families to sign a consent form, permitting the shelter to release information to the public schools. The consent form offers no assurance of confidentiality, and some families have refused to sign. However, the county takes the position that as long as the family is on TANF (Temporary Assistance for Needy Families) and the county is paying their rent or they are living in a county shelter, signing the consent form is a requirement.

The DSS transfers information on homeless students in their shelters on a daily basis to Southern Westchester BOCES, where it is entered into the Homeless Student Program DSS database, available for “internal use only.” This database includes information on a student’s age, grade, and attendance/ absences; family composition; current residence; designated school and district; last permanent residence; and start and end dates of homelessness. Program staff notify the school the student will attend (or is attending) that the student is homeless and, if necessary, make arrangements for transportation.

The BOCES DSS database allows the Homeless Student Program to track attendance and academic performance data on all homeless students, which is used to target special services. Data on homeless students is provided to each of the districts for reporting purposes, and

between 2004 and 2006 the Homeless Student Program completed LOUISE for the participating districts, with district liaisons adding counts of students not in shelters. While district homeless liaisons complete and maintain the STAC-202 forms for students not housed in DSS shelters, it is unclear whether the direct line between shelters and BOCES renders some districts too passive, promoting the assumption that all homeless students are sheltered. The fact that all homeless students in White Plains were identified as being in shelters suggests this may be the case.

The NYSED's 2007 RFP for McKinney-Vento sub-grants

In spring 2007, the NYSED requested proposals for McKinney-Vento sub-grants from all districts with homeless students. While the RFP set a ceiling on sub-grants, which ensures that New York City cannot receive as high a per student rate of funding as other districts with significantly fewer homeless students, the RFP took a step forward in promoting agency collaboration by requiring that proposals include districts' plans for such collaborations.

Summary

Over the past several years, a range of factors has impeded collaboration across agencies and between social service agencies and the public schools, particularly in New York City. Although cross-agency collaboration will not help identify those children whose families do not avail themselves of agency assistance or those unaccompanied youth who stay clear of all social service agencies, it will certainly help to improve counts of – and, hopefully, services to – students experiencing homelessness. The NYSED has taken several important steps to encourage cross-agency collaboration, including convening HAC, promoting Southern Westchester BOCES's Homeless Student Program, and allocating funding for the current McKinney-Vento sub-grant competition based, in part, on districts' plans for collaboration.

Conclusions and recommendations

Our research was directed to examining how homeless students are identified by district and school personnel, as well as at how school districts record, aggregate, and transmit that information to the NYSED for use in reporting to the federal government and the court, as part of the Consent Decree.

We found that improving student identification at the school level is the most serious challenge to providing an accurate statewide count of homeless students. Better systems for recording and reporting information to the state will increase efficiency. But without improved identification, they will not result in large increases in the accuracy of district and state data on homeless students.

Concerns regarding privacy and confidentiality play a large role in the reluctance of school and some district personnel, as well as staff at some social service agencies, to formally identify students as being homeless. Identification is increased when educators or social service

workers believe that this identification will result in additional services. However, for many who care deeply about homeless students, the services available to homeless students are insufficient to run the privacy risks of identification.

Based on our research findings, we make the following recommendations to help New York State improve the accuracy and efficiency of data collection on homeless students.

1. Improve identification of homeless children and youth.

Among the distinct sub-populations of homeless individuals, the largest sub-populations of school-aged children and youth live in the following three situations:

- with families in shelters;
- with families doubled up;
- unaccompanied, “couch surfing,” or on the streets and in other unsheltered places.

Children in shelters

In those districts with shelters, students living with their families in shelters are the easiest to identify. In many districts, information regarding school-aged children is routinely transferred from the local shelter system to the public school system. Yet, in New York City, NYCDOE counts of homeless students are significantly under the counts available from the DHS.

- * The NYSED should encourage all public school systems with shelters in their districts to reach out to agencies running shelters (including family shelters, shelters for single adults, domestic violence shelters, and shelters for runaway youth) to create systems for the transmittal of information on students experiencing homelessness.
- * Arrangements for the transmittal of information should be structured to ensure the confidentiality of students and their families. The NYSED can offer models for language that assures confidentiality.
- * The NYSED should post model memoranda of understanding to be used, when necessary, between public school systems and an agency or agencies serving homeless children and youth.

Children living doubled up

Public schools enroll significant numbers of children in families living doubled up. Although this group tends to remain invisible, various attempts have been made to estimate its size. For example, according to the 2000 census, 125,000 families in New York City were living in the household of another person (Advocates for Children 2006). While not all of these families could legally be identified as homeless according to McKinney-Vento, census figures likely under-report the true numbers of those living doubled up.³

³ The Census Bureau cautions data users that any attempt to use the results as a measure of the number of actual people experiencing homelessness would be inaccurate (Smith & Smith 2001).

New York City DHS data suggest that for every family in the shelter system, an additional three apply but are either declared ineligible or make other arrangements. Since a major reason for applying to a public shelter is “being forced out of a family or friend’s apartment due to overcrowding, discord, or domestic violence,” many applicants who don’t receive shelter are likely to be doubled up (Mowry 2006).

The DHS data is an important source for arriving at a closer understanding of the level of homelessness in high-poverty New York City neighborhoods. The HomeBase program, housed in six New York City neighborhoods – Brooklyn (two), Manhattan (one), Queens (one), and the Bronx (two) – attempts to reduce homelessness through a mix of case management and resources for clients (Mowry 2006). As part of this effort, the DHS geo-codes data on where the applicants lived before arriving at the shelter, with each applicant coded as eligible, ineligible, or MOA (made other arrangements). Appendix B presents a sample of HomeBase geo-coded data.

- * The NYSED should work with DHS and the NYCDOE to establish a channel for information sharing between HomeBase and New York City’s community school districts to ensure that these districts learn the numbers of applicants with school-aged children. This can then be used to gauge the accuracy of current counts and to estimate how many additional students are likely to be homeless, as defined by McKinney-Vento. A contact for this effort might be Melissa Mowry, Program Director, CAMBA HomeBase Homeless Prevention Initiative in Bedford Stuyvesant, telephone 718-622-7324.
- * Information from HomeBase could be used as a model to be replicated by shelter systems in other communities in New York.

Unaccompanied homeless youth

Unaccompanied homeless youth, who may be out of school, are among the groups least likely to be identified in any enumeration of the homeless. Generally shy of both public school systems and social service agencies, these youth are often victims of physical, emotional, and/or sexual abuse; orphans of parents who have died or are serving jail terms; the neglected children of parents with mental illness or problems with substance abuse; or youth who have aged out of the foster care system (Citizen’s Committee for Children 2006).

For the past twenty-five years, point-in-time estimates of homeless youth under the age of twenty-one in New York City have ranged from 15,000 to 20,000 young men and women, many of whom are involved in street culture and its informal economy (New York City Association of Homeless and Street Involved Youth Organizations 2005). While these youth are largely out of school, about one in five unaccompanied homeless youth attended high school the previous semester (Clatt 1996), and more might be involved in education if there were better outreach. The NYSOCFS currently develops annual reports on run-aways by every New York State county. These reports include children admitted to – and

denied – programs or services. Although these data do not indicate whether the youth are in school, they could be used to augment, correct, and corroborate current counts of run-aways. (See NYC Association of Homeless and Street Involved Youth 2005).

- * NYSED should meet with NYSOCFS to discuss how the data collected for the annual reports might include information of broader use, including the district of the runaway or homeless youth and whether these youth are in or out of school.
- * NYSED should analyze the data produced annually by the NYSOCFS. This effort does not require costly increases in staffing or technology. Instead, staffing could be provided by clerical employees or interns responsible for regularly reviewing data and communicating trends to both NYSED officials and homeless liaisons.

2. Improve data-collection tools.

Data collection has been accomplished in New York State through two forms, the STAC-202 form and the Residency Questionnaire. The duplication of forms is inefficient. Moreover, none of the forms individually asks everything, nor do all the forms together ask everything required by the U.S. Department of Education to comply with McKinney-Vento or by New York State's Consent Decree.

- * NYSED should take the lead in refining a Designation Form that includes as much information required by McKinney-Vento as possible, to be filled out in *all* (not just Title I) districts. This can be done using the revised Designation Form proposed by NYS-TEACHS. The form should include instructions for maintaining confidentiality.
- * The STAC form should be simplified, made available online, and used for tuition reimbursement only.

3. Improve data-collection systems.

Over the past several years, the NYSED has collected data on homeless students through three major data systems – BEDS, LOUISE, and SIRS – with only BEDS and SIRS ongoing. SIRS is under development, and will not be usable systemwide for several years. Moreover, SIRS is not amenable to detailed questions that may shift from year to year, and, because the information will travel with the student throughout his or her education, the system is inappropriate to the provisional and personal information required by McKinney-Vento legislation.

With BEDS remaining the main data system statewide for the foreseeable future, it is important to alter confusing instructions regarding point-in-time versus cumulative reporting, which likely accounts for a significant proportion of the miscounts of homeless students.

- * Given its enormity as a system, the difficulty of adding data items, the delays in its implementation, and privacy concerns, SIRS should be used sparingly for collecting

data on homeless students. The proposed addition of questions regarding the student's homeless and Title I status should enable districts to report academic progress and services to homeless students.

- * To clarify traditional confusion, BEDS should ask for *both* a point-in-time (October 15) count of homeless students and a cumulative count for the preceding year, as is currently asked for.
- * The NYSED should continue to use the survey developed by the National Center for Homeless Education (NCHE) for Colorado and currently being considered elsewhere. This survey allows for the detail mandated by McKinney-Vento, as well as data required by the Consent Decree. At the same time, the use of a separate data system preserves greater student confidentiality.
- * The NYSED should continue to make every effort to warn districts as early as possible about all data to be reported on homeless students, including on the proposed NCHE survey, so that they can prepare by keeping accurate counts of relevant information.
- * The NYSED should make plans for the analysis of information collected through the NCHE survey, to be shared with districts as soon as possible after the survey is conducted.

4. Improve collaboration.

Collaboration between governmental and nonprofit agencies serving homeless children and youth will help develop more-accurate identification and better-coordinated services. But to generate a willingness among educators and social service agencies to enter information, identification should be linked both to real services for students and families and to assurance of privacy and confidentiality.

- * The NYSED has taken several important steps to encourage cross-agency collaboration, including convening HAC, promoting the Southern Westchester BOCES Homeless Student Program as a model, and allocating funding for the current McKinney-Vento competition on the basis of districts' plans for collaboration.
- * The NYSED should take the lead in disseminating model memoranda of understandings, confidentiality release forms, and other information that facilitates such collaborations.
- * The NYSED should disseminate realistic descriptions of best practices in cross-agency collaboration, such as the program at Southern Westchester BOCES. It is important to describe both the strengths and existing or potential problems of such programs.
- * Because the problems of New York City are large and unique, the NYSED should work to increase the representation of key New York City stakeholders in the Brooklyn HAC

meetings. Moreover, simply allowing interested individuals around the state to listen in is insufficient.

- * Additional HACs, or other similar networking activities, should be established for districts in Westchester County (including Yonkers), for Long Island, and for Buffalo, Rochester, and Syracuse.

5. Widen communication, training, and education.

The NYSED and NYS-TEACHS have engaged in extensive and useful training of liaisons. However, homeless liaisons often operate in isolation, and communication could be strengthened between the NYSED and liaisons so that when there are discrepancies in data, channels are open for dialogue. In addition, school-level personnel appear largely unaware of federal and state laws protecting homeless students. Although liaisons can do some turnkey training, most have a range of other responsibilities. Moreover, in New York City, half a dozen liaisons cannot penetrate 1,400 schools.

- * The NYSED should continue to make every effort to communicate regularly with liaisons. This can be done, for example, through sharing information from other data systems that may be useful to liaisons in providing checks on numbers.
- * The NYSED and NYS-TEACHS should continue to provide quality training for district homeless liaisons across the state.
- * The NYSED, with the assistance of NYS-TEACHS, should develop strategies beyond turnkey training of liaisons to provide more information and knowledge to school- and district-level personnel. This might include:
 - * directing training to the thirty districts with over fifty homeless students, with training focused on high-need schools within these districts;
 - * placing articles in statewide and local publications for teachers (UFT publications, etc.) and other school personnel;
 - * placing articles and brochures in the mailboxes of teachers in schools and districts with high-need populations;
 - * making presentations at meetings and conferences attended by such professionals as school social workers and guidance counselors who are likely to be involved with homeless students, or at professional meetings and conferences on related topics such as Title I and McKinney-Vento.
- * The NYSED should develop a system for citing best practices in identifying and serving homeless students. Best practices identified should make clear the linkage between confidentiality, provision of services, and the accuracy of obtained data. This list of best practices should be disseminated through a brochure and/or the NYSED and NYS-TEACHS Web sites.

6. Protect the privacy of homeless children through confidentiality requirements.

The identification of homeless students is deeply connected to concerns by educators, social service representatives, and parents about confidentiality and privacy. While some of these concerns relate to what might be termed “gossip” among school personnel, the more serious concern is focused on the permanency of a paper or electronic trail regarding a student’s period of homelessness and the negative effects of this data point in how the student is later perceived.

Both state and district regulations guarantee confidentiality to all students, and there are specially worded guarantees to homeless students and runaway youth. We believe that the NYSED’s data systems have been developed to ensure this confidentiality at different levels. However, for a range of reasons, including our national climate, neither educators nor homeless families and youth are convinced that their privacy is being safeguarded by the large data systems in use and under development by the state. The matter is particularly critical for undocumented families, among whom there are likely to be students experiencing homelessness. Whether or not this reflects the reality of New York’s educational data system, these beliefs are unlikely to change overnight, particularly in the current political climate.

- * The NYSED should conduct a strong and vigorous campaign both within and outside the education community to make clear how data is, and will be, protected to ensure confidentiality of vulnerable populations.
- * The NYSED should develop better and more public guidelines regarding the privacy of students experiencing homelessness. These guidelines should make explicit how the “need-to-know” conditions under which data can be shared are tied to service provision. This will encourage school staffs to identify and report homeless students.
- * NYSED should make clear in easily readable language how it gathers, reports, and stores data and how the system protects student confidentiality. This explanation should be made available in formats attractive to both families and educators.
- * NYS-TEACHS should create a working group to develop guidelines on what should and should not be a matter for students’ permanent records.

7. Increase accountability.

Currently school and district personnel believe that there are no real sanctions for missing or inaccurate data on homeless students. The problem with data accuracy is exacerbated by test-score and fiscal pressures, which result in administrative disinclinations to enroll homeless students or to label students as homeless. Moreover, schools and districts currently have no outside data systems against which to gauge their own data.

- * The NYSED should implement a monitoring system with both rewards and sanctions to encourage more-accurate identification and counts of homeless students, as delineated by the above checks and comparisons. Outside data systems could be used as part of the systems of checks. Schools and districts could be publicly cited for progress toward full and accurate counts, which would provide both reward and sanction functions.

Additional rewards might include points accrued toward a McKinney-Vento sub-grant (see next recommendation), or descriptions of their process on the NYSED Web site or in an NYSED brochure. Sanctions might include increased on-site and paper monitoring.

8. Serve New York's districts on the basis of need.

The NYSED has been careful to distribute all McKinney-Vento resources “equitably” throughout the state. While this has brought sub-grants to a number of small rural districts, enabling them to develop important resources for homeless students, large districts with high rates of homelessness – particularly New York City – remain under-served by this manner of distribution. In fact, the current RFP, while rewarding creative proposals for developing collaborations, has further diverted resources from New York City.

- * In the future, NYSED should evaluate proposals for McKinney-Vento sub-grants on a point system that includes among its explicit decision-making factors the level of need in the district.

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APPENDIX A

Data requirements and current tools collecting required data

	Mandated Questions	BEDS (School District Summary Form) Fall 2005	BEDS (Public School Data Form) Fall 2005	LOUISE (District)	SIRS (Individual)
McKinney-Vento (all districts)	Number of homeless children enrolled by grade		Asked		Asked
	Type of primary night-time residence	Asked		Asked	Not in SIRS
McKinney-Vento (districts receiving sub-grants)	Number of homeless children enrolled by grade		Asked		Asked
	Academic progress			Asked	Deducible
	Type of primary night-time residence	Asked		Asked	Not in SIRS
	Services and activities funded by sub-grant			Asked	SIRS asks whether student is served in district program supported by McKinney funds “Type of services” not in SIRS
	Enrollment by grade	Asked by grade range		Asked	Deducible
	Number of sub-populations			Asked	Deducible for ESL, disabled, migrant children “Unaccompanied Youth” not in SIRS
	Barriers to education			Asked	Not in SIRS

NOTES

BEDS School District Summary Form asks for the number of homeless students, regardless of whether they receive services funded by the federal McKinney-Vento Homeless Assistance Act, while the BEDS Public School Data Form asks for the number of homeless enrolled in school who are being served using McKinney-Vento funds.

LOUISE: U.S. Department of Education—required questions only.

If information on sub-populations (unaccompanied and migrant) is not available, LOUISE asks why and how information will be obtained.

If performance-assessment information on reading and mathematics by grade level is not available, LOUISE asks why and how information will be obtained.

SIRS: “Homeless Indicator” is a new data element for 2006–2007.

“Deducible”: Indicates information on homeless students that can be deduced by cross-tabbing the “homeless indicator” with other SIRS data elements.

	Mandated Questions	BEDS (School District Summary Form) Fall 2005	BEDS (Public School Data Form) Fall 2005	LOUISE (District)	SIRS (Individual)
Consent Decree (BEDS or LOUISE) All Districts	Number of homeless children in district	Asked			Asked
	Performance information			Asked	Deducible
	Types of services provided			Asked	SIRS asks whether student is served in district program supported by McKinney funds "Type of services" not in SIRS
	Ages of homeless children				Deducible
	Percentage remaining in school of origin				Deducible (using "backmapping BEDS code" variable)
	Length of enrollment delays				SIRS asks "Enroll Entry Date" "Date of first attempt to enroll" not in SIRS
	Average wait for transportation				Not in SIRS
	Attendance information				Deducible (at-risk students with high absence flagged)
	Number of appeals, types of disputes, resolutions				Not in SIRS
Consent Decree Sample Districts NYSED Survey	Number of homeless children enrolled by grade	Asked by grade range		Asked	Deducible
	Attendance information				Deducible (at-risk students with high absence flagged)
	Performance information			Asked	Deducible
	Transportation information				Not in SIRS
	Other information about education of homeless child				Not in SIRS

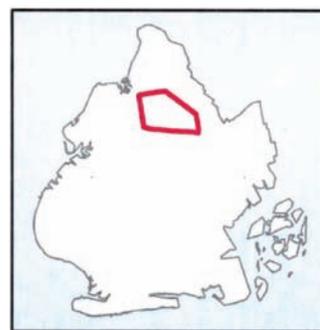
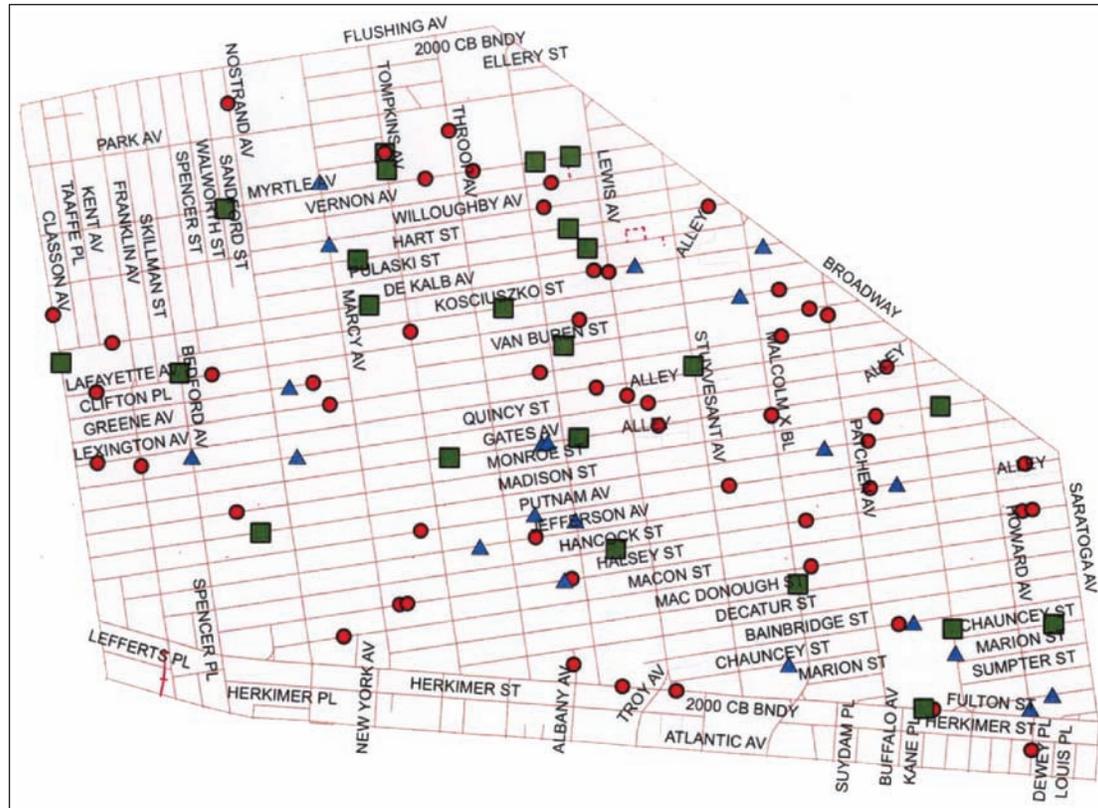
APPENDIX B

HomeBase geo-coded data on families requesting shelters

Shelter Applicant Reports by Community Districts

SOURCE: New York City Department of Homeless Services 2007

Community District 303 – January 2007



Legend

- 57 Eligible
- ▲ 21 Ineligible
- 23 MOA
- City Street
- Vehicle Only Street
- Railroad Track
- Shoreline
- Other Non-Street Feature
- Paper Street
- Private Street; 6, V
- Alley
- Addressable Path



