

Aug. 10, 2022

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AUG 19 2022

Honorable Michael T. Smyth  
Presiding Judge of the Superior Court  
220 West Broadway  
San Diego CA 92101

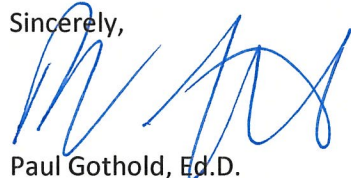
Re: Response to the Grand Jury Report: "Supporting Homeless Students: We Have the Laws—We Just Need Full Compliance"

Dear Judge Smyth:

Enclosed is our response to the Grand Jury Report of May 31, 2022, concerning services being provided to homeless children and youth by the several agencies in San Diego County, including the San Diego Office. A copy of the response is being provided to you in accordance with the Grand Jury's "Requirements and Instructions." In addition, our response to the report has been sent to Grand Jury Foreperson Jim Mendelson.

If I can be of further assistance, please do not hesitate to contact me.

Sincerely,



Paul Gothold, Ed.D.  
County Superintendent of Schools

PG:GC:CA

Enclosure

**Finding 1: Not all LEAs are in compliance with AB 27 and SB 400**

Agree. It's critical we have an accurate count of students and families experiencing homelessness so our educational agencies can provide support and access to resources that could make a big difference in the lives of young people in need. SDCOE works throughout the year to train LEA homeless liaisons in the requirements of the law and best practices for supporting students who are experiencing homelessness. However, it is important to note that requirements within AB 27 "shall only apply to local educational agencies receiving funding from the American Rescue Plan Elementary and Secondary School Emergency Relief - Homeless Children and Youth Fund" pursuant to Section 2001(b)(1) of the federal American Rescue Plan Act of 2021 (Public Law 117-2).

**Finding 2: A stronger focus on coordination of efforts between schools and SDCOE and state agencies would also facilitate a more integrated, comprehensive response to the problem.**

Partially disagree. SDCOE coordinates extensively with schools and state agencies to ensure a more integrated, comprehensive response to the problem is enacted. Statewide and locally, SDCOE's focus is on being a center of support for LEA homeless liaisons, so they can meet the needs of students and families experiencing homelessness. This includes regular communication, ongoing and annual training sessions, and leading and participating in a variety of community networks of support. Our students in need deserve a community of caring adults and strong relationships with those adults so they can easily access help and support. However, SDCOE lacks the authority to impose specific actions on, or to enforce the compliance of, LEAs as it relates to the majority of the items identified in the Grand Jury report. SDCOE provides extensive support and resources (such as technical assistance and training) in order to ensure LEA homeless liaisons uphold the rights of students experiencing homelessness.

**Finding 3: Few districts and schools surveyed have easy to find contact information on their websites.**

Agree. It's critical that families and students in need can quickly and easily access contact information at their school or district. SDCOE annual training sessions for LEA staff members includes requirements for website content related to supporting students experiencing homelessness. We work to ensure LEAs have the tools and guidance to remove barriers to access and success for their students in need. Our students and families experiencing homelessness often have high levels of stress, and finding important educational information shouldn't be an added barrier.

**Finding 4: Although districts offer training, there is inconsistency in training, content, and requirements.**

Agree. LEAs make local decisions around training for their staff and how they utilize professional development days. Many LEAs choose to send a liaison or staff to an SDCOE, CDE, or National Center for Homeless Education (NCHE) training, or they take advantage of

downloadable training materials to present to staff or have staff review items at their own pace. Students experiencing homelessness need and deserve caring, informed adults in their educational systems who have the resources and tools to provide access to supports. While SDCOE does not have the authority to impose specific actions or enforce the compliance of LEAs, our team provides regular communication with LEA homeless liaisons, and annual training sessions and toolkits on federal and state requirements and best practices for supporting students experiencing homelessness.

#### **Recommendations:**

**22-15 Work with all LEAs to immediately come into compliance with AB 27 by implementing the use of the Housing Questionnaire, as required, and monitor LEAs' compliance.**

Response: This recommendation has been implemented as practicable, and this work is ongoing.

SDCOE is committed to assisting and supporting all LEAs in implementing and meeting all statutory requirements. This has a direct result in the educational experiences of our students experiencing homelessness and their families.

#### Summary of implemented action:

- Oct. 7, 2021 – Within a week of the signing of AB 27, SDCOE sent an email blast to the 178 individuals on the SDCOE Homeless Education Services email list. The message included a summary of this legislation that outlined the changes the bill made, the complete text of the bill, a copy of the housing questionnaire developed by CDE per this legislation, and a copy of the guidance for use of the questionnaire also developed by CDE. This email highlighted the fact that the bill went into effect immediately and noted that documents could also be found in the SDCOE online toolkit.
- Oct. 7, 2021 – CDE sample housing questionnaire and guidance document added to SDCOE Homeless Education online McKinney-Vento Toolkit.
- Oct. 12, 2021 – After receiving questions from several LEAs regarding implementation of the housing questionnaire and consulting with CDE, SDCOE sent another email blast to the homeless education liaison list. The email clarified that LEAs were not required to use CDE's form as long as the required elements were included (i.e., summary of rights and entitlements available to families) and CDE's recommendation that LEAs stick to the language in the template. In addition, a Spanish language version of the questionnaire template was attached to the email along with the offer from CDE to translate into additional languages on request.
- Oct. 12, 2021 – Spanish language versions of the CDE questionnaire added to the online McKinney-Vento toolkit.
- Oct. 5 and 12, 2021 – SDCOE bi-annual countywide McKinney-Vento 101 training (two-part series) takes place. This training is open to anyone in the county in any role at any

LEA. It is intended for newer staff in the role of supporting students experiencing homelessness or as a refresher for seasoned staff. The training included information on AB 27 and SB 400, including implementation strategies and considerations. Training was attended by 65 individuals for Part I and 48 individuals for Part II, representing 32 LEAs.

- Dec. 7, 2021 – Selected homeless liaisons receive a letter from CDE stating that based on their most recent Consolidated Application and Reporting System they, as the liaison, have not been adequately trained on homeless education within the last two years. Four San Diego County liaisons (two district and two charter school) are on that list. The letter outlines the requirements and encourages liaisons to reach out to their COE and/or take advantage of training from NCHE, the technical assistance provider for the US Department of Education. The letter also directs recipients to the CDE website where they have posted several PowerPoint presentations and webinars.
  - Both district liaisons reached out to SDCOE and arranged training for their district. One charter school on the list is no longer in operation.
- Jan. 7, 2022 – CDE sends an announcement of all upcoming training opportunities from January thru March being offered by NCHE.
- Jan. 11, 2022 – San Diego County Joint Foster Youth and Homeless Liaison meeting is held. AB 27 requirements are reviewed and CDE template questionnaire and guidance documents are provided as handouts. Upcoming training opportunities are provided and reminder about training requirements are also covered in the meeting.
- Feb. 18, 2022 – CDE resends training announcement from NCHE with April trainings added.
- April 5, 2022 – CDE sends training announcement from NCHE with additional opportunities in April and all May offerings.
- May 11, 2022 – Second San Diego County Joint Foster Youth and Homeless Liaison meeting is held for 2022. AB 27 requirements are reviewed again. CDE template questionnaire and guidance document are again provided as handouts.
- Training opportunities from SDCOE and other community agencies were shared with all liaisons via email on Nov. 29 and Dec. 3, 2021; and on March 21, March 30, May 6, and May 16, 2022.
- During the current school year, 16 LEAs have reached out to SDCOE Homeless Education for specific technical assistance relating to the housing questionnaire and/or the website requirements.
- To Be Completed: SDCOE Homeless Education is working on an LEA self-assessment tool that addresses legal requirements around homeless education.

**22-16 Assist district liaisons to coordinate with school liaisons to implement consistent, compliant, and timely notification and support for unhoused families, consistent with the requirements of the McKinney-Vento Act, AB 27, and SB 400.**

Response: This recommendation has been implemented, and this work is ongoing.

This recommendation is implemented in the daily work and purpose of the SDCOE Homeless Education Services (HES) program. SDCOE is committed to increasing access to supports and

services for students experiencing homeless and we provide supports strategies for all mandates as outlined in Education Code and the McKinney-Vento Homeless Assistance Act. This includes support for notification through access to posters and training, as well as support for students and families. We do this in a number of ways, including:

- HES program develops and offers **training and professional development opportunities** for LEAs and community partners. For each training provided, LEAs are given information regarding the priority areas on their Local Control and Accountability Plans (LCAP) that the training supports. This information allows our LEAs to incorporate various professional development resources into their LCAPs as well as ability to infuse the principles on all campuses. Our program ensures that all participants have readily available access to relevant materials through our shared resource folders.
- SDCOE also provides **technical assistance** to districts, charter schools, school site personnel, institutes of higher education, and community organizations. We respond to several hundred phone calls and email requests per year. We employ the following guiding principles for technical assistance: Offer multiple levels of support; investigate and use adult learning strategies; develop trusting relationships; build on existing strengths; and collaborate with experts.
- HES maintains an **online Homeless Toolkit** with information and resources for liaisons, site staff, and parents. The toolkit includes training information for school site or office staff handling enrollment. It provides a McKinney-Vento overview including liaison responsibilities, enrollment and identification strategies, unaccompanied youth, CALPADS, disputes, transportation, and sample residency affidavits, board policies, and verification letters. It also provides links from other sources on FERPA, HIPPA, CalFresh, immigration, and family preparedness. From the toolkit, LEAs can access and download copies of the notification posters with pre-filled county and state information in English and Spanish.
- Three times a year SDCOE **convenes all district and charter homeless and foster youth liaisons** for an informational meeting. These joint meetings serve to ensure interconnection between the homeless and foster programs; update liaisons on any new or pending legislation or legislative changes including implementation guidance; provide county-wide updates; and information on new or existing local programs. This allows a time for ideas and resources to be shared and exchanged. We also keep a listserv and communicate updates to liaisons on an ongoing basis.
- In order to help LEAs better facilitate appropriate referrals to services, SDCOE participates in several **collaborative efforts between community agencies, the education community, and child welfare**. These cooperative efforts enable us to make important links between schools and community agencies that have directly benefitted students and families. These collaborative efforts include the Julian Backcountry Collaborative, East Region Collaborative Network, and the countywide Built 4 Zero initiative. In partnership with NCHE, we created the Higher Education Stakeholder Group. This group is composed of cross-systems partners focused on the access and success at higher education for students experiencing homelessness. In addition, HES co-founded the San Diego Youth Homelessness Consortium, which is a collaborative

entity made up of over 50 member agencies across the county working together to end youth homelessness.

**22-17 Coordinate a review of all school and school district websites to ensure McKinney-Vento & AB 27/SB 400 compliance information, including the listing of district and school liaisons, is complete, accurate, and easily accessible for diverse users.**

Response: The recommendation will not be implemented.

It is critical that families and students in need can quickly and easily access compliance and contact information on their school or district websites. Therefore, SDCOE will continue to allocate our staffing resources to recommend and strongly encourage LEAs to regularly review and update their websites so as to be in compliance. We make every effort to work with LEA homeless liaisons to eliminate barriers to enrollment, attendance, and success so that every child experiencing homelessness has equal access to the same free, appropriate public education as their peers. SDCOE is committed to serving all students in need as outlined by McKinney-Vento and state legislation. While it's not feasible for SDCOE to monitor all the websites for the county's 799 schools and 42 school districts, we will continue to address website requirements and best practices in trainings that occur multiple times throughout the year.

SDCOE makes it clear in our trainings for any LEA staff that a high school diploma is the single greatest risk factor for future homelessness, so supporting all students in persisting in education is of the highest importance. Both the McKinney-Vento 101 and Identification of McKinney-Vento Students training sessions cover website requirements, best practices, and strategies. We stress the importance of having information displayed prominently and accessible to families regardless of their ability or device.

**22-18 Advocate with school and district leadership to invest in training and professional development for school and district liaisons to deliver comprehensive McKinney-Vento Act training and retention programs to better serve students.**

Response: The recommendation has been implemented.

SDCOE Homeless Education team members advocate and communicate regularly to deliver comprehensive McKinney-Vento Act training and retention programs to as many school staff members as possible each school year.