

**Illinois State Plan
for the Education for Homeless
Children and Youths Program**

Illinois State Board of Education

Revised May 2007

**MCKINNEY-VENTO HOMELESS ASSISTANCE ACT
TITLE VII, SUBTITLE B
EDUCATION FOR HOMELESS CHILDREN AND YOUTHS PROGRAM**

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McKinney-Vento Homeless Assistance Act, Title VII, Subtitle B
Illinois State Plan for
Education for Homeless Children and Youths

- I. *Procedures for ensuring that homeless children and youths are given the opportunity to meet the same challenging state academic achievement standards that all students in the state are expected to meet.*

The application for the McKinney-Vento Homeless Assistance Act was not included in the Illinois Consolidated State Application for the *No Child Left Behind* Act of 2001 (*NCLB*); however, the state coordinator for the Illinois Homeless Education Program (HEP) was a full partner in planning the Illinois State Board of Education (ISBE) consolidated application.

ISBE has established procedures to ensure that homeless children and youths are afforded the same opportunities to be successful learners as other children and youths. Ensuring that all Illinois students develop the knowledge and skills necessary for success in the 21st century is a challenge both broader and more difficult than the challenges that have faced public schools in the past. Achieving success will require long-term strategic plans that seek quantum leaps, as well as continuous improvement, and actions that combine research and educational best practices with creativity and innovation. Cross-coordination of programs is essential to the goal in *NCLB* that all students will meet state academic standards by 2014, including homeless children and youths.

In January 1995, the Illinois Education for Homeless Children Act of 1994 (*Appendix A*) became law. In January 2002, most provisions of the Illinois law were incorporated into the federal McKinney-Vento Homeless Assistance Act. In December 1995, the Illinois State Board of Education adopted its “Policy on the Education of Homeless Children and Youth” (*Appendix B*), requiring all school districts to comply with this policy, as well as with federal and state laws regarding the education of homeless children and youths.

Since 1995, homeless children and youths in Illinois have, by state law and Illinois State Board policy, been given every opportunity to continue their education, without interruption, in their school of origin. Their current learning environment may well be the only part of their lives that is not disrupted. One of the most important ways in which Illinois schools can help students experiencing homelessness to meet challenging state academic standards is to reduce their mobility rate and provide a stable school setting in which to learn. Therefore, transporting them to their school of origin has been essential for their educational success.

For those homeless children and youths whose parents/guardians choose to enroll their children in schools other than the school of origin, these children are enrolled immediately. Schools then work with the homeless family and the previous schools to obtain needed records. This work is extremely important in ensuring that these displaced children are afforded every opportunity to achieve state academic standards. These families in housing transition will be ensured privacy. The school district shall provide an educational environment that treats all students with dignity and respect. Every homeless student shall have equal access to the same free and appropriate educational opportunities as students who are not homeless. This commitment to the educational rights of homeless children, youth, and unaccompanied youth not living with a parent or

guardian, applies to all services, programs, and activities provided or made available and is extremely important in ensuring that these displaced children are afforded every opportunity to achieve state academic standards.

Getting important information on the rights of homeless children and youths to school officials, community organizations, and other local service providers for the homeless population has been a challenge. In 1996, ISBE awarded a coordinated statewide awareness grant, called *Opening Doors: Statewide Access to Education for Homeless Children and Youths (Opening Doors)*, to three entities for implementation—the Center in Des Plaines, the Regional Office of Education in Macomb, and the Social Work Department of the University of Illinois in Urbana-Champaign. Each of them had a specific role to complete for overall state awareness.

At the beginning of the project, the University of Illinois at Urbana-Champaign surveyed principals, teachers, and school social workers on their awareness of the legal rights of homeless children and youth. In 1998, the University of Illinois at Urbana-Champaign conducted a second survey of school personnel and learned that *Opening Doors* had been very successful in getting its message into Illinois communities and schools, greatly increasing the percentage of the surveyed school staff who had become aware of the educational rights of homeless children and youths. This role has been completed and the University of Illinois at Urbana-Champaign is no longer involved in the awareness and education program with ISBE.

Opening Doors and the Macomb Regional Office of Education continue to function in the coordinated awareness and education implementation role. The Center in Des Plaines has created and updated written materials appropriate for school personnel and other materials appropriate for community organizations and then distributed materials throughout the state.

The Macomb Regional Office of Education created, manages, and updates a web page; produces a quarterly newsletter on homeless education issues, and developed training videos used in educating school personnel and community organizations that provide services to families, children, and youths experiencing homelessness.

ISBE has continued to and will continue to disseminate awareness materials at least twice a year to all local educational agencies (LEAs) and at least once a year to shelters and other service providers throughout Illinois. The development of specific education and awareness materials for homeless shelters has been identified and will be completed and distributed on an ongoing basis to ensure that shelter personnel have current education materials to use in their support and assistance to families, children, youths, and unaccompanied youths in transition due to homelessness.

Now that many provisions of Illinois law have been incorporated into federal law, the focus in Illinois will be to continue to educate schools and communities on the rights of homeless children and youths. A provision in the new federal law that was not part of Illinois law is the requirement to have a homeless education liaison in every school district. Illinois school districts have already identified their liaisons as part of completing their application for federal Titles I, II, IV, and V funds (*NCLB* LEA application). The few Illinois school districts that do not receive federal funds also will be required to identify a liaison. The state superintendent will request those school district superintendents to appoint a local liaison and provide contact information.

One of the key roles for a school district homeless education liaison will be to ensure that all homeless children and youth in the school district receive the services needed to be successful in school. The state coordinator for the HEP working with the staff will complete writing the statewide *NCLB* local application. This will ensure that LEAs required in the application to set aside Title I funds to serve homeless children and youths attending schools that do not receive these funds continue to receive support. The State HEP Coordinator continues to be involved in issues involving the *NCLB* Consolidated State Application and ensures that *NCLB* efforts are coordinated with the State HEP Coordinator; the coordinator also is included in training for schools for the LEA applications for *NCLB*, Title I funds.

Initiated in fall 2002 and ongoing, ISBE began the process of training the homeless education liaisons. As these liaisons became familiar with their required roles, they became the key individuals to enhance the educational opportunities of homeless children and youths. The liaisons ensure that homeless students are included in the statewide achievement testing. This translates into homeless children having an increased likelihood of meeting the state’s academic achievement standards. The liaisons’ role to work with unaccompanied youths and help them make important decisions regarding their education is vital to improving the educational opportunities of this hard-to-serve population.

To measure progress in meeting the educational needs of homeless children and youths, Illinois will continue gathering valid and reliable data on the educational achievements of homeless children and youths, which was initiated in the 2002-2003 academic year. ISBE provided USDE with its initial baseline data, as required, by January 31, 2003, and provides data collected annually on homeless children and youths.

Beginning in the 2002-2003 school year, ISBE collected data from HEP-funded LEAs based on the indicators of program quality developed during summer 2001 by a work group convened by the National Center for Homeless Education. Illinois continues to gather and report data annually from all school districts regarding services for homeless children and youths based on guidance from USDE. Data are collected using the ISBE Web Application Security (IWAS) system for data collection and analysis.

Table 1.

Activities	Timelines
1. Distribute materials to school district liaisons and verify receipt by the school liaison.	At least semiannually and upon request.
2. Distribute awareness and educational materials to shelter providers and to other local providers for homeless families.	At least annually, ongoing, and on request
3. Train local homeless education liaisons.	Ongoing
4. Collect data due to the secretary by due date annually.	Data to ISBE by December annually
5. Collect data from ISBE-funded providers, including achievement test data.	Annually

Activities	Timelines
6. Collect data on homeless student enrollment from all school districts.	Based on USDE guidance updated on an ongoing basis
7. Update local liaison assignments.	Semiannually and as notified by school districts with new liaison training scheduled within 30 days of their assignment to the position.
8. Provide Administrators Academy homeless education training for school administrative personnel.	Each Area will provide between 2-3 academies per year, depending upon the request and need in the Areas.
9. Yearly determination of the local liaison assignments by e-mail and follow-up phone contact by each Area Director's office, with verification determined.	Annually

II. Procedures ISBE will use to identify homeless children and youths in the state and to assess their special needs.

Homeless children and youths in Illinois will be identified by school personnel and through coordination of activities with other entities, such as homeless shelters and community service agencies. Additional organizations and professionals to be targeted in the future for identification are public health clinics; Women, Infants, and Children programs; vision and dental screening offices; and other local areas where families may engage their children in care that can assist in identification, education, and referral for educational services in Illinois.

To ensure that these children and youths are identified, the homeless education liaisons will be trained to educate and work closely with all frontline school personnel in the school district (e.g., principals and school secretaries), as well as with community social service agencies and Continuum of Care programs. Continuum of Care programs, funded by the U.S. Department of Housing and Urban Development, are represented in every Illinois community and are responsible for locally coordinating services to homeless families. A close working relationship between homeless education liaisons and staff of the Continuum of Care programs is critical to meeting the educational and support services needed by homeless families. A key part of training for school personnel and social service agencies will be to emphasize the need to sensitively identify families in homeless situations and the need to be respectful of the families' privacy, i.e., speaking to families in a private office instead of in a crowded setting. Homeless education liaisons will work closely with their school staff to ensure that the Student Information System designation in the data element criteria for homeless classification is completed for each homeless student enrolled in the school, or will change the designation when a student is identified as a homeless student at any time during the academic year and will remain designated during the entire academic year as a homeless student from the date of identification or enrollment.

The homeless education liaisons will disseminate information on the McKinney-Vento Homeless Assistance Act by means of posters, brochures, and other print materials. The homeless

education liaisons will be trained to ensure that public notice of the educational rights of homeless children and youths is disseminated where these students receive services, such as schools, family shelters, bus and train stations (with permission of the establishment), thrift clothing shops, and soup kitchens. An initiative to increase the sites where information is distributed in 2007-2008 will include public health clinics; Women, Infants, and Children clinics; dental and vision screening clinics serving children in their school physical exams; and any local medical clinics where children traditionally receive low-cost school physicals or other medical or health services for adolescent youth. Other sites may be determined on an ongoing basis to be included in the distribution site list to include local public libraries, after-school and tutoring programs, children's food centers, and food pantries in local communities.

Materials developed at the national level and coordinated through the National Center for Homeless Education, as well as materials developed through the *Opening Doors* project, will be appropriately displayed in all schools and throughout local communities. All Continuum of Care programs have received and use *Opening Doors* materials on a continuing basis and will continue to work with the homeless education liaisons to disseminate information in their communities. Annual public service announcements will be created and distributed before the beginning of each school semester to educate and inform families in the community about the definition of homeless children and youths and the services that are available to them through their schools.

The federal definition of homelessness that is part of the McKinney-Vento Act will be reflected in all materials and the homeless education liaisons will receive training on understanding this definition. This ensures that once homeless children and youths are identified, they will receive available assistance within the community and, most importantly, information on their rights to continue their education without interruption. All updated information will be provided in a timely manner to all Illinois school homeless education liaisons to add to their Homeless Liaison Toolkit.

ISBE has developed and annually reviews a needs assessment instrument with assistance from the homeless education liaisons, the Continuum of Care programs, advocacy organizations, and other community agencies. The needs assessment is conducted at the end of each school year to assist local decision makers to determine local service gaps and to assist the State HEP Coordinator in state-level planning.

Table 2.

Activities	Timelines
1. Train homeless education liaisons to identify homeless children and youths and update training at least every other year.	Ongoing
2. Provide information to other local services and continue to identify service providers who need information about homeless education.	At least once annually
3. Develop needs assessment.	January 2003
4. Review needs assessment and conduct needs assessment.	Annually

III. Procedures for the prompt resolution of disputes regarding the educational placement of homeless children and youths.

Illinois has had a dispute resolution process in place since enactment of the Illinois Education for Homeless Children Act of 1994. Illinois has recognized the importance of handling disputes at the local level, where issues and parties involved are most likely to be clearly known, and therefore the best interest of the student should be served. The ISBE policy on the Education of Homeless Children and Youth (IECHA) 105 ILCS 45/1-1 *et seq* and the federal McKinney-Vento Homeless Assistance Act 42 U.S.C. § 11431 *et seq.* are included as appendices to this revised plan.

Under section 1-25 of the Illinois law, each regional superintendent of schools serving one or more Illinois county must appoint an ombudsperson at the beginning of each academic year who will be responsible for resolving disputes at schools within his or her jurisdiction relating to the rights of homeless children. The appointed ombudsperson will take part in training for the position at a time designated by the State Coordinator for Ombudsperson yearly training.

As part of the responsibility, the ombudsperson will resolve disputes regarding educational placement of homeless children and youths. As required by law, in situations where disagreements regarding, among other concerns, enrollment or transportation occur between the school district and any homeless child or youth and his or her family, the school district shall immediately refer the child, youth, or his or her parent or guardian to the ombudsperson and provide the child, youth, or the parent or guardian with a written statement of the basis for the denial. It is the responsibility of the ombudsperson to convene a meeting of all parties and attempt to resolve the dispute within five school days after receiving notice of the dispute, if possible.

If a school denies a student enrollment or transportation, he or she must be enrolled *immediately* in and transported to the school chosen until final resolution of the dispute. In accordance with ISBE policy, the ombudsperson will have the following responsibilities:

1. The ombudsperson must be familiar with the educational rights and needs of families and children and youths experiencing homelessness.
2. When disagreements arise, the ombudsperson must work with all parties (i.e., the homeless family, the child's guardian, or an unaccompanied youth's surrogate guardian and the school district personnel) to schedule a dispute resolution meeting; provide notification of the meeting that is verifiable (i.e., date, time, and location with directions, if needed) to each party, and to the extent available, provide the parties with any information or resources they have requested to enable them to provide a full and fair presentation of their positions in the dispute resolution process. If at all possible, the dispute resolution meeting should occur within five days after the school district has informed the family of its decision.
3. In conducting the dispute resolution meeting, the ombudsperson must allow for a complete presentation of relevant facts by all parties. The child or youth and/or his or her

family or guardian will be allowed to have assistance from a legal representative knowledgeable about federal and state laws pertaining to homeless students' educational rights.

4. At the conclusion of the meeting or promptly thereafter, the ombudsperson must provide a thorough written communication of his or her decision to the parties and inform them of the ability to have the State HEP Coordinator (i.e., ISBE staff person responsible for the program) review procedural issues and compliance with the applicable law.
5. Either party, within five days of receipt of the ombudsperson's written decision, may send a request to the State HEP Coordinator to review the decisions rendered for compliance with the applicable laws. If such a request is made, it must include the documentation related to the dispute resolution proceedings.
6. The written decision issued by the ombudsperson shall include, at a minimum, the background facts, any procedural history, a summary of the dispute resolution proceedings (e.g., the witnesses presented and evidence entered), the legal statutory and/or regulatory provisions at issue, and the ombudsperson's findings and conclusions based on the facts and the law.
7. In situations where the decision of the ombudsperson is appealed to the State HEP Coordinator, the ombudsperson must prepare an index of the record, including, without limitation, a listing of all documents presented, written arguments received, and other written correspondence. The record shall be organized in chronological order and include a certification signed by the ombudsperson representing that the record is complete and accurate. The ombudsperson shall timely document and maintain a record of dispute resolution proceedings until such time as a final disposition (i.e., decision is accepted by all parties or the State HEP Coordinator issues a determination) has occurred.
8. If the ombudsperson, at the time of the receipt of the notice of a dispute resolution proceeding or at any point thereafter, determines he or she knows or reasonably should know of an actual or potential conflict, he or she shall immediately disclose such conflict in writing to the parties, and unless the parties are legally permitted to and do agree in writing to waive such conflict, shall recuse him or herself from the matter.
9. Appeal process:
 - Upon receiving a request for review, the State HEP Coordinator may request from either party any additional information that he or she deems relevant to determining compliance with applicable law. No later than 10 school days after receiving the request for review, the State HEP Coordinator shall make a recommendation to the State Superintendent of Education regarding the ombudsperson's decision and the appropriate placement of the student (deferring, in this review, to any and all findings of fact by the ombudsperson).
 - Within 10 days of receiving a recommendation from the State HEP Coordinator, the State Superintendent of Education or designee will inform all parties of the final determination.

- If the State Superintendent of Education or designee determines that the action of the school district giving rise to the dispute is inconsistent with applicable law, the State Superintendent of Education or designee may order the school district to take any action necessary for such school district to be in compliance with applicable law. Should the school district not comply with such order, the State Superintendent of Education shall place the school district’s recognition status on probation in accordance with 23 Ill. Admin. Code 1.20(b).
- Regardless of the decision of the State Superintendent of Education or designee, the State HEP Coordinator will follow up with the school district within five school days after such determination to review the status of the dispute.

Ombudspersons will be trained annually on an ongoing basis to carry out and mediate the resolution process as expeditiously as possible by ensuring that the ombudsperson convenes a meeting of all parties and attempts to resolve the dispute within five school days, as required by the Illinois law. If a dispute arises, the homeless education liaisons and the ombudspersons will also be trained on the requirement to inform parents and/or guardians and youths on sources of low-cost or free legal assistance and other advocacy services in the community. The ombudspersons also will be trained to meet the NCLB requirements to ensure that the ombudsperson completes and provides a written explanation of the school’s decision, including the right of the parent, guardian, or youth to appeal and ensure that the children or youth continue to attend their current school until the complete resolution of the dispute is completed. The ombudsperson’s duties also include ensuring that an unaccompanied youth, as defined in the McKinney-Vento Act, is *immediately* enrolled in school pending resolution of the dispute.

Table 3.

Activities	Timelines
1. Train homeless education liaisons in dispute resolution processes.	Ongoing
2. Train homeless education liaisons in their duties to represent homeless youths who may be involved in a disagreement related to their homeless status and education.	Ongoing
3. Regional superintendents of education will appoint the ombudsperson at the beginning of the academic school year.	Annually
4. Ombudspersons appointed to the position will accomplish annual training relative to their position.	Annually

IV. *Description of the Illinois programs for school personnel (including principals, attendance officers, teachers, enrollment personnel, and pupil services personnel) to heighten their awareness of the specific needs of runaway and homeless youths defined as unaccompanied youths.*

Unaccompanied youths include young people who have run away from home, been thrown out of their homes, and/or have been abandoned by their parents or guardians. These young people are separated from their parents for a variety of reasons. Unaccompanied youths face unique barriers to enrollment and success in school. Without a parent or guardian to advocate for them or exercise parental rights, they are sometimes denied enrollment and remain out of school for

extended periods of time, as they misunderstand their educational rights or knowledge of how to acquire the information.

The education provisions of the McKinney-Vento Act, now incorporated into the NCLB program, ensures the educational rights and protection for homeless children and youths with the law's direct application to homeless, unaccompanied youths and the special attention to them within the Act.

These students, "unaccompanied youths," include those youths in homeless situations who are not in the physical custody of a parent or guardian, have the same rights as other students experiencing homelessness with equal access, transportation, immediate enrollment, and school of origin rights, and the McKinney-Vento state plan must address problems caused by enrollment delays due to guardianship issues and how youths are identified and provided equal access to education.

ISBE funded the statewide *Opening Doors* project in 1996. The main goal of this project remains dissemination of information on the educational rights of homeless children and youths to all school districts, as well as to shelters and other local community agencies in Illinois. This information includes print materials, such as tip sheets for school personnel and awareness-raising videos, which are used for inservice training and presentations by *Opening Doors* partners across the state. Posters outlining educational rights have been distributed to schools, shelters, and social service agencies for several years, and the new posters directly addressing unaccompanied youths receive the same priority as all other McKinney-Vento Homeless Education material distribution. With the McKinney-Vento Act special emphasis on runaway and homeless youths, *Opening Doors* designed a new poster meant to appeal to such youths and their friends/peers who may be in school. City of Chicago Public Schools 299 also developed a relevant poster. The plan is to put posters in every high school and alternative high school throughout Illinois and to distribute them to shelters that accept youths, organizations that work with youths on the streets, and Continuum of Care programs.

Homeless education liaisons will work in their communities to identify homeless youths not currently in school. As mentioned earlier, posters by *Opening Doors* targeting homeless youths and their friends and peers will be distributed in communities and at all high schools and alternative schools. In addition, the *Opening Doors* tip sheets on identifying homeless children and youths will be distributed to all homeless education liaisons, who will be responsible for distribution to relevant school personnel. Once a community network of homeless service providers identifies out-of-school homeless youths, the homeless education liaison will be contacted and will work on behalf of the homeless youths to ensure that they have every opportunity to complete their high school education. If extra help is needed, the homeless education liaison will ensure that these youths are connected to available services in the community and will help them to enroll in available before- and after-school programs, as appropriate.

IDEA 2004 guidelines pertaining to unaccompanied youths with disabilities, as defined by IDEA:

1. Each public agency is required to ensure that the rights of unaccompanied homeless

- youths are protected.
2. The definition “parent” includes individuals acting in the place of a biological or adoptive parent and that relatives and nonrelatives of unaccompanied youths may be considered a parent if they are acting in the place of the biological or adoptive parent and the youth is living with them.
 3. For unaccompanied youths, IDEA specifically requires LEAs to appoint a surrogate parent by making reasonable efforts to complete an appointment within 30 days and may include the following—appropriate staff members of an emergency or transitional shelter, independent living program, street outreach program, the state, the LEA, or another agency involved in the care of the child, as long as the person has adequate knowledge and skills and does not have a personal or professional interest that conflicts with the interest of the youth.
 4. IDEA allows LEAs to use up to 15 percent of their grants to develop programs to intervene with K-12 students who have not been found eligible for special education but who need additional academic and behavioral support, with emphasis on the primary grades.

Table 4.

Activities	Timelines
1. Train local homeless education liaisons on specific needs of runaway and homeless youths.	Ongoing
2. Distribute homeless youth posters.	Summer 2002 and ongoing
3. Establish a homeless youth advisory committee.	Fall 2002
4. Train homeless education liaisons in working with homeless youths, particularly runaway and throwaway youths.	Ongoing
5. Distribute updated information on unaccompanied youths to all sites where youths may gather to educate and inform them of their rights.	June 2007 and ongoing
6. Development of collaborative relationships with shelters and service providers focusing on unaccompanied youths.	2005 with annual updates, semiannual meeting attendance, and development of the shelter information booklet in 2007.
7. Train school district personnel on the educational rights of unaccompanied youths, including guardianship issues that cannot exclude enrollment.	Individually for each youth and annual updates for training and education of school district service delivery to unaccompanied youth.
8. Establish enrollment procedures to accommodate unaccompanied youths with direct referral to the school homeless education liaison to provide assistance to develop a surrogate educational advisor relationship for the youths regarding educational decisions and use	Annual review of procedures and updates, as needed to all school districts.

Activities	Timelines
of the Caregiver Form.	
9. Revise policies related to attendance and credit, determine signers for field trips and extracurricular activities through work with ISBE legal staff.	Annually, with updates as needed.
10. Develop strategies to provide continuing education for students who have been suspended.	Ongoing
11. Provide referral to appropriate social service agencies for services such as food stamps and make materials available to unaccompanied youths that explain benefits.	Individually for each youth and update information annually for referral sources.
12. Follow the guidelines defined in the IDEA 2004 relative to homeless unaccompanied youths who have a disability or special educational need.	Annually, with updates as needed.

**Section 107 (Runaway, Homeless, and Migrant Youth) states that effective July 1, 2004, homeless, runaway, or migrant children are categorically eligible for free school meals. No application is required for these children—they may be directly certified based on lists provided by a local shelter director, a school district homeless education liaison or migrant education coordinator, or similar officials. The lists must contain the child’s name and a signature and date of the official making the determination. The eligibility lasts for the full school year regardless of changes in status as runaway, homeless, or migrant.

V. Description of Illinois procedures for ensuring that homeless children and youths who meet the current relevant eligibility criteria are able to participate in federal, state, or local food programs.

The materials developed and disseminated by *Opening Doors* include information regarding the right of homeless children and youths to receive services under the free and reduced lunch program. These materials will be reviewed and revised to include current changes in laws and procedures (e.g., Illinois schools can serve/pay for after-school snacks and suppers) and homeless education liaisons will be responsible for assisting in the documentation of the eligibility of homeless children and youths for free meals. The U. S. Department of Agriculture (USDA) has requested that state agencies and school food service authorities be particularly sensitive to children, youths, and households identified by homeless education liaisons as homeless.

On April 4, 2002, the USDA sent a memorandum to its local providers stating that:

“To expedite the delivery of nutritional benefits, school officials may accept documentation that the children are homeless from the local education liaisons or directors of homeless shelters where the children reside. Documentation to substantiate free meal eligibility must consist of the child’s name or a list of names, effective date(s), and the signature of the local education liaison or the director of the homeless shelter. This documentation is acceptable in lieu of a free and reduced price meal application.”

Additionally, implementation of these expedited procedures encourages public school

determination officials to work closely with the homeless education liaison to ensure that homeless children and youths are provided free meal benefits as promptly as possible, school food service promptly advised when homeless children and youths leave school or are no longer considered homeless, and that households or unaccompanied youths are provided with an application for free and reduced price meals when the family or youths are no longer considered homeless. The homeless education liaison must carefully evaluate each child’s situation.

Homeless children and youths residing with another household application process will not include the size and household income of the “host family” to determine eligibility for free or reduced price meal eligibility. The “host family” may now also be eligible for free or reduced price meals based on the total number in the household and can be provided temporary approval for this eligibility until the homeless family leaves the “host family” residence.

Unaccompanied youths who live alone are to be considered a household of one based on the definition of “emancipated child” in the *Eligibility Guidance for School Meals Manual. Section 107 (Runaway, Homeless, and Migrant Youth Directive USDA update from the Child Nutrition and WIC Reauthorization Act of 2004, Public Law 108-265, which amended the Richard B. Russell National School Lunch Act)* states that effective July 1, 2004, homeless, runaway, and migrant children are categorically eligible for free school meals. No application is required for these children, as they may be directly certified based on lists provided by the local shelter director, a school district homeless education liaison or migrant education coordinator, or similar officials. The lists must contain the child’s name and a signature and date of the official making the determination. The eligibility lasts for the full school year regardless of changes in status as runaway, homeless, or migrant.

All homeless education liaisons will be trained in using this USDA guidance and *Opening Doors* materials. The USDA guidance also will be used as a guide to state and local food programs. ISBE staff who work with school nutrition programs will be trained on an ongoing basis to maintain the most current information related to the USDA regulations pertaining to families with children or youths who are experiencing homelessness on the McKinney-Vento Act and the role of the homeless education liaisons, and work with their contacts at local schools to make sure that local nutrition staff are familiar with the local homeless education liaison.

Table 5.

Activities	Timelines
1. Distribute USDA memorandum.	Summer 2002 and maintain all updated guidance.
2. Train homeless education liaisons in procedures.	Ongoing
3. Train ISBE nutrition program staff.	Summer 2002 and update as necessary
4. Homeless education liaisons will provide guidance to schools regarding eligibility of homeless families, children, and youths for free and reduced price meals as part of the enrollment process.	Ongoing with each enrolled child.
5. ISBE Division of Nutrition Programs provides workshops	Area lead liaisons will

Activities	Timelines
annually on certification and verification of students for free and reduced price meals.	determine if new homeless education liaisons will participate in the annual workshop as part of their first year training on an ongoing basis.
6. ISBE Nutrition Program newsletter <i>The Outlook</i> will be linked to the <i>Opening Doors</i> website for homeless education.	Ongoing

VI. Description of Illinois procedures for ensuring that homeless children have equal access to the same public preschool programs administered by ISBE as provided to other children in Illinois.

The person most responsible at the local level for ensuring that homeless children and youths receive services they need to be successful learners is the homeless education liaison. Training the homeless education liaisons to be the key education resource for families experiencing homelessness is critical in the local planning process to provide comprehensive services for these families. The homeless education liaison will work with other service providers, particularly those in the Continuum of Care provider system, to keep current on local homeless populations and to identify new services available to families experiencing homeless situations.

The importance of sharing a list of their area homeless education liaisons with the Continuum of Care programs and then providing the homeless education liaisons with contacts in their local Continuum of Care programs underscores that this collaborative partnership development is the only means to the creation of effective two-way communication. This active working partnership has as its goal the best educational service provision and services for homeless families, children, and youths. A structured referral format is an option that would allow both entities to complete timely, accurate service connections to address the needs of homeless families and to identify children age birth to five who are in need of early childhood education services in all areas of Illinois. Homeless education liaisons in the schools hold the key to identification of the family demographics to determine the early childhood education needs for homeless families.

School homeless education liaisons will identify homeless families with preschool-age children during initial school enrollment or as part of the identification of a family transitional status during the academic year and will collect data on all children in the home. It will be the responsibility of the homeless education liaison to ensure that the homeless children and their families have equal access to ISBE-funded preschools available in their community and referral to all early childhood programs of any kind that homeless children age birth to five may be eligible for education in the community service area.

ISBE early childhood programs are those included in the Early Childhood Block Grant: Preschool for All, Pre-kindergarten Programs for Children at Risk of Academic Failure; Model Early Childhood Training (birth to three and three to five years of age); Prevention Initiative for Programs Offering Coordinated Services to At-Risk Children and Their Families (birth to three);

and Even Start Family Literacy Programs designed to break the cycle of illiteracy by improving the educational opportunities for low-income families, funded through a competitive state grant process, emphasize the relationship among early childhood education, parenting education and involvement, and future school success. ISBE believes that the educational development and success of all Illinois children can be significantly enhanced when children participate in early childhood programs and services with a commitment to supporting early childhood education that ensures that all Illinois children have the opportunity to develop a strong foundation for learning.

The Preschool for All Children initiative focuses on providing high-quality educational programs for children who are determined to be at risk of academic failure. First priority is given to children at screening who are deemed at risk of academic failure due to home and community environment, with a disproportionate share of all children at risk arriving at education that include low-income working families, homeless families, families where English is not the primary language, and families where one or both parents are teens or who have not completed secondary education. Homeless children are a priority in this high-risk category and if slots are available at the time of request, a homeless child can be enrolled and then screened within the first 30 days to establish and develop an education plan for the child.

Children age birth to three are eligible for the Prevention Initiative Programs in the Early Childhood block grants that will be operated in schools defined in the grant that have experience in providing educational, health, social, and/or child development services to young children and their families. The parent education portion of the program must be offered to include seven areas of instruction: child growth and development, includes prenatal; childbirth and child care; family structure, function, and management; prenatal/postnatal care for mothers and infants; child abuse prevention; parenting skill development; and the physical, mental, emotional, social, economic, and psychological aspects of interpersonal and family relationships. Families in this prevention program will receive their services through a seamless and unduplicated system that includes screening processes; parent education and training; community collaboration and linkages; parent/community involvement planning; case management services, an individual family service plan delivered by appropriately qualified staff that include, but are not limited to, early childhood teachers, counselors, psychiatrists, psychologists, and social workers; and ongoing professional development and program evaluation to determine outcome progress for the family and their children.

At the state level, the ISBE early childhood staff are trained in the McKinney-Vento Act and the importance of including opportunities for homeless children and their families to be able to enroll in preschool programs, where available. The early childhood staff also will be provided with the list of homeless education liaisons, a description of their roles at the school district level, and the need to have local early childhood providers work closely with them. Homeless education liaisons will receive training on the issues of barrier removal to early childhood education, requirements for referral and screening of all children, and awareness training related to early childhood education programs goals, objectives, and outcomes.

The homeless education liaisons also will work with local sources to determine whether other preschool services, such as Head Start, are available to young children of homeless families.

Head Start, as a result of a 1992 memorandum to its grantees and delegate agencies, has specific local criteria for meeting the needs of homeless children in their communities. This policy memorandum will be sent to every homeless education liaison and included in homeless education liaison training, and homeless education liaisons will contact and provide training and collaborative service information sharing between community Head Start programs and school homeless education liaisons on a regular and continuing basis during the academic year. Head Start staff will provide information about families whom their staff identify in need of homeless education services when older school-age children are part of the family constellation. Head Start programs have identified a need to closely align their family service provision for early childhood students with local homeless education liaisons to coordinate service provision.

Head Start programs need to be identified for training by the Area lead liaisons to ensure that all children who are experiencing homelessness are being referred for appropriate Head Start services and that these children can be clearly identified as homeless children by Head Start staff. Knowledge of all services for homeless children and youth need to be shared with Head Start staff. A close working relationship will be established with Head Start staff to allow for priority waiting list selection to be accomplished and to assist Head Start staff in meeting the requirements for children experiencing homeless conditions that the immunization requirement be met through active involvement with referral and assistance to local public health clinics to allow for admission to the Head Start program. Head Start staff, in their collaborative relationships with local public health clinics, can be a source of obtaining immunization records to ensure that homeless children do not receive excessive immunization due to lack of family immunization records.

As part of the Head Start Reauthorization, regulations are being put in place to remove the barriers to enrollment and participation of homeless children that will ensure that homeless children are identified and prioritized for enrollment; will allow families to apply to, enroll in, and attend Head Start programs while required documents are being obtained; will use the Head Start outreach services to assist with the immunization requirement for admission to Head Start; and will develop coordination of services with the State McKinney-Vento programs to identify and report the numbers of homeless Head Start students enrolled in programs in their states. Illinois will work with local Head Start programs to gather data in communities within the Area McKinney-Vento Homeless Programs on a voluntary basis to determine the needs of homeless children age five and under. Training will be provided to Head Start programs during the annual Head Start conference and at other statewide meetings at which the Homeless Education Program is invited to share training for Head Start staff.

Table 6.

Activities	Timelines
1. Train homeless education liaisons on the importance of preschool for very young homeless children.	Ongoing
2. Train state-level early childhood staff.	2008
3. Provide the homeless education liaisons with copies of the 1992 Head Start memorandum.	Summer 2002 and updates annually, or as delivered.

Activities	Timelines
4. Train Head Start staff on McKinney-Vento Homeless Education at regional and statewide conferences annually, at their request.	Beginning in 2007, provide annual training at Illinois Head Start conferences to participating staff.
5. Gather data on a voluntary basis from Illinois Head Start programs to document homeless children enrolled in their programs by the Area Lead Education staff of each Area in Illinois.	Beginning in 2008, voluntary data collection from Illinois Head Start programs of homeless children numbers.
6. Develop and deliver early childhood resources to all homeless education liaisons in cooperation with the ISBE Early Childhood Education Program.	Ongoing and updated as necessary
7. Provide annual training and education to Early Childhood program grant participants by Area lead liaisons from the ISBE Homeless Education Program through conference presentations.	Beginning in FY08 and ongoing annually
8. Create a Homeless tip sheet on Early Childhood Education and update as new information is developed.	FY08 <i>Opening Doors</i>
9. Homeless Education will work collaboratively with ISBE Early Childhood Education to begin development of an Early Childhood Education Toolkit to include learning standards, staff and professional development resources, bibliographies, best practices, and program briefs that will increase the knowledge and skill of both early childhood parent coordinators, where available, and homeless education liaisons.	FY08 development with completion in FY09

VII. Description of ISBE strategies for addressing problems set forth in its FY00 report provided to the Secretary under subsection 722 (f)(3) of the Act.

The Illinois FY00 HEP report to USDE identified four barriers to school attendance/enrollment of homeless children and youths: residency requirements, legal guardianship issues, lack of available preschool programs, and lack of awareness of the Illinois state law. As mentioned previously, this law was used in crafting the new McKinney-Vento Act. It has helped eliminate most school barriers for homeless children in Illinois.

In Illinois, ISBE has been persistent, through *Opening Doors*, in providing copies of the law and materials to help implement the law, but there have been some LEA personnel who have either misunderstood the law or thought that it did not pertain to their schools. Credit goes to ISBE legal staff for clarifying issues regarding the law and its implementation.

In September 1999, the ISBE Legal Department issued a memorandum to regional superintendents regarding residency issues. Among other things, this memorandum underscored the law in Illinois that, unless a child living apart from a parent or legal guardian is present in a school district solely for the purpose of attending school, the child has a right to attend school in that school district tuition free. That principle of law applies to homeless as well as non-

homeless students. This legal memorandum also has been shared with Illinois LEAs as requested or in response to inquiries. It is also believed that many regional superintendents have shared this with LEAs in their regions.

In August 2000, ISBE legal staff issued two more legal opinions on homeless education issues. The first, Definition of Homelessness (legal opinion of homelessness and doubled-up families), helped clarify that, in some situations, doubled-up families could be considered homeless. Since ISBE had distributed the Categories of Homeless Children in USDE *Preliminary Guidance* (June 1995) for the McKinney Act of 1994 and had used this guidance to educate school districts on identifying homeless families, one of those categories (e.g., doubled-up) is a consideration in determining whether or not a family is homeless. Having the expanded definition of homelessness as part of the new McKinney-Vento Act and not just in the guidance helps to clarify who meets the definition.

The second legal opinion, Homeless Education: Violations of Zoning Ordinances and Local Housing Authority Rules, noted that the living arrangements of families should be considered confidential by school districts if the information is part of the student’s school records, even if the living arrangement may break local zoning or housing rules. Having ISBE legal staff support the HEP since the passage of the Illinois law has reduced and nearly eliminated the number of questions regarding interpretation of the law. There have been few residency and guardianship issues lately. The assistance of ISBE legal staff will continue to be useful as ISBE implements the new McKinney-Vento Act.

As for the last barrier, lack of available preschool programs, having a homeless education liaison working in each Illinois community will help homeless families to gain access to available preschool services. Even with direction from ISBE to the McKinney-funded programs to actively seek placing homeless preschool-age children into publicly funded preschools, the number of these children in Illinois preschools is still small. With better coordination with Head Start programs, state staff informing their local contacts to work with the homeless education liaison and liaisons working with homeless families to help them access educational services, more homeless preschool-age children will be enrolled.

Table 7.

Activities	Timelines
1. Work with the ISBE attorneys on issues regarding the new law, particularly residency and guardianship issues.	Ongoing
2. Distribute the new law and materials to help implement the law.	Summer 2002
3. Train the homeless education liaisons in preschool issues.	Ongoing

VIII. Strategies for addressing problems with respect to the education of homeless children and youths, including problems resulting from enrollment delays that are caused by immunization and medical records requirements; residency requirements; lack of birth certificates, school records, or other documentation; guardianship issues; or uniform or dress code violations.

Since the enactment of the Illinois Education for Homeless Children Act, school districts have received guidance from ISBE, including the Illinois State Board policy, that school districts must comply with this state law, as well as with federal laws concerning homeless children and youths.

This model law requires that schools enroll homeless students immediately and then work with these families to ensure that they receive assistance to obtain required documentation and any other help they may need to ensure that the children have every opportunity to become successful learners. With the help of ISBE legal staff, the funding of the *Opening Doors* project, strong relationships with advocacy groups, and coordination with the Continuum of Care programs and knowledgeable McKinney-funded program liaisons, most barriers have been or will be eliminated statewide.

Materials are sent to every school district annually. With the emphasis of the McKinney-Vento Homeless Education program in Illinois, the homeless education liaisons in Illinois schools will be rechecked for accuracy to maintain the annual listing of all Illinois school homeless education liaisons and an annual evaluation system will be put in place to determine new homeless education liaison assignments and their training needs to ensure that materials about the Illinois McKinney-Vento programs reach the intended audience. Brochures and documents related to homeless education are being updated regularly on the *Opening Doors* website, which is maintained by one of the *Opening Doors* partners. A clickable map of Illinois allows immediate access to the most up-to-date information about homeless education liaisons in Illinois. Additionally, the listserv developed for Illinois homeless education liaisons allows for immediate distribution of new information in e-mail format and in the *Our Home* quarterly newsletter. This has reduced the long process of continually mailing information to school districts annually. Homeless education liaison training needs will be evaluated annually by each of the Area lead liaisons to determine updated training needs for all liaisons.

Many school districts are increasing their awareness of homeless laws and improving the handling of homeless situations locally. This is an assumption based on the fact that, over the years, calls to the Illinois State HEP Coordinator have changed from calls indicating unawareness of the laws to calls wanting to know how to comply with the intent of the laws. Still, there is no assurance that all homeless families in the state are receiving services they are eligible to receive based on federal and state laws.

This situation has improved with the requirement that every school district appoint a homeless education liaison. There is still a need to continue to educate school districts about the need to appoint a homeless education liaison for each school, who will then participate in homeless education liaison training and will follow up by providing services to homeless families at enrollment in their school and to provide education and assistance to the school staff regarding

the education requirements of children and youths experiencing homeless situations. As the homeless education liaisons are trained and become more familiar with their responsibilities as identified in the McKinney-Vento Act, they will play a critical role in increasing the awareness of homeless laws and ensuring the delivery of services throughout Illinois.

Table 8.

Activities	Timelines
1. Distribute materials on requirements of federal and state laws to enroll homeless children immediately.	At least twice annually
2. Train homeless education liaisons in enrollment procedures.	Ongoing
3. Train homeless education liaisons in procedures to obtain required documentations.	Ongoing
4. Update homeless education liaison training materials for school staff.	Ongoing

IX. Demonstration that ISBE and LEAs have developed, and will review and, as necessary, revise policies to remove barriers to the enrollment and retention of homeless children and youths in schools in the state.

To ensure that the Illinois Education of Homeless Children Education Act is fully implemented, the State Board of Education adopted a policy on the education of homeless children and youths in December 1995. It requires all Illinois school districts to comply fully with the policy and with federal and state laws affecting the rights of homeless children and youths. The ISBE policy also requires that all LEAs review any rules or regulations, practices, or policies that may act as barriers to the enrollment of homeless children and take steps to revise them so that homeless children and youths are afforded the same opportunities as the non-homeless. This policy also emphasizes the importance of homeless students attending their school of origin without interruption, wherever possible.

Through the guidance in this policy, along with the strong state law on the education of homeless Illinois children, Illinois has taken almost every possible step in ensuring that homeless children have the opportunity to meet state academic standards. Now that there is a federal law modeled after the Illinois law, but with some additional requirements beyond those included in the Illinois law, the State Board of Education will review the federal law and adopt an updated policy that directly supports it.

Table 9.

Activities	Timelines
1. State Board of Education reviews current policy and adopt a modified one, as needed, to support federal and state law.	Ongoing yearly
2. Mail new State Board of Education policy to all school districts.	Late Summer 2002
3. Work with school districts to revise any local policies that are barriers to enrollment.	Ongoing

X. *Description of how Illinois will ensure that LEAs will comply with requirements of Section 722(g)(3) through (g)(7) of the Act.*

In Illinois there are 45 Regional Offices of Education, with elected Regional Superintendents of Education. One of their primary duties is to visit all schools in their region for statutory and regulatory compliance and recommend school recognition status. A key part of this process is to determine compliance with selected federal and state programs. A probe on the education of homeless children and youths that monitors the required components in Section 722 of the Act for LEAs was added to their school evaluation form to determine whether schools are in compliance with the McKinney-Vento Act.

As previously discussed, ISBE legal staff will continue to work with the State HEP Coordinator on a case-by-case basis. The legal staff will help clarify the intent of the McKinney-Vento Act for school districts that either misunderstand the law or feel that the law does not pertain to a particular situation.

In addition, the State HEP Coordinator will obtain a randomly selected list of LEAs that do not have a contact in their region working with a funded McKinney-Vento program. The State HEP Coordinator will coordinate visits to these selected school districts while conducting normal monitoring activities of funded McKinney-Vento programs.

Table 10.

Activities	Timelines
1. Add section on homeless law to ROE school evaluation instrument.	Summer 2002
2. Regional superintendents of education review school performance, including McKinney-Vento requirements.	Ongoing
3. State HEP Coordinator visits randomly selected LEAs.	Ongoing

XI. *Description of the technical assistance that the state will furnish to LEAs and how the SEA will coordinate its compliance efforts with LEA liaisons designated under paragraph (1)(J)(ii) in Section 722 of the Act.*

ISBE takes a two-level approach in furnishing technical assistance to the LEAs throughout the Illinois. First, through distribution by *Opening Doors*, materials developed on the national level are made available. A national team has created a handbook and toolkit for training LEA liaisons to help them fully understand the requirements of the McKinney-Vento Act, specifically the duties the homeless education liaisons are required to fulfill. *Opening Doors* continues to distribute these materials to the LEA homeless education liaisons and makes available all training materials for new homeless education liaisons assigned in Illinois schools. In addition, *Opening Doors* materials are revised as needed and provided to the homeless education liaisons.

The second level of technical assistance involves not only providing these materials to the homeless education liaisons, but also becoming educators about the new law and providing

hands-on training of groups of homeless education liaisons. A number of McKinney-Vento grantees throughout the state are very experienced, having provided services to homeless children and youths for many years. A small group of these experienced grantees agreed to become “point persons” for training the homeless education liaisons in their geographic areas. *Opening Doors* coordinates this training process, working closely with the point persons in creating presentations of varying lengths; for example, if a school’s in-service session is brief, the 12-minute video may be used. A longer session could include the video and a short talk touching on the major points of the law.

In order to reach areas of the state in which there is no nearby McKinney program, it will be important to develop a closer working relationship with the Continuum of Care programs throughout the state. Another way ISBE bridges the distances and helps to connect all homeless education liaisons is through a listserv created specifically for them. The homeless education liaisons share experiences, ask others how they are handling a specific problem, etc. Having all homeless education liaisons networked through e-mail is one solution to the geographic challenges.

Table 11.

Activities	Timelines
1. Distribute homeless education liaison toolkits.	Summer 2002 and updated on ongoing basis.
2. Train homeless education liaisons in small groups.	Ongoing
3. Establish a homeless education liaison listserv.	Summer 2002 and continue to update semiannually or as new homeless education liaisons are appointed.

XII. Description of how the SEA will use funds it receives under this program to carry out state-level activities and to make subgrants to LEAs.

At the state level, funds are used to support the functions of the State HEP Coordinator, who has been assigned to work full time and is responsible for administering the program. ISBE ensures that all functions of the Office of the State HEP Coordinator are conducted in a timely manner.

For the last seven years, ISBE has funded a statewide awareness program that has been referenced frequently in this plan. That program has played an integral role in raising the awareness of the educational rights of homeless children and youths. Its role has been expanded to include involvement in training LEA home education liaisons as a key part in the statewide awareness activities.

ISBE funds McKinney-Vento programs for three years to help provide continuity in local program administration. Programs receive the same funds as the previous funding year as long as they submit a continuation application in compliance with federal and state law. With increases in funding, programs will appropriately be granted funds as stated in their RFP and

needs assessment, depending upon the funding level for each year. In FY08 a new three-year grant cycle will begin, with an updated state plan and RFP addressing the guidelines of the McKinney-Vento federal funding requirements, and federal funding will be aligned with the grant distribution.

The current list of funded McKinney-Vento programs in Illinois includes seven Lead Local Education Areas serving all school districts. A map is included in the upcoming three-year RFP, showing the location of these programs and the areas of the state that they serve. This map also will indicate which LEAs and Regional Offices of Education are eligible to apply for these additional funds.

Appendix A

Illinois Education for Homeless Children Act of 1994

Appendix B

Policy on the Education of Homeless Children and Youth