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Voices From the Field

Program Feature on the Intersection of Title I, Part D; McKinney-Vento Act; and Title I, Part A Foster Care

Prepared by the National Evaluation and Technical Assistance Center for the Education of Children and Youth Who are Neglected, Delinquent, or At-Risk (NDTAC)

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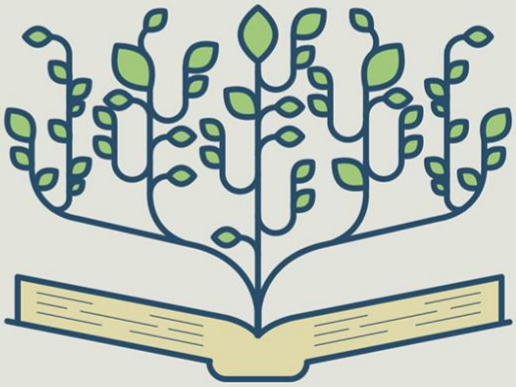

THE
NATIONAL TECHNICAL ASSISTANCE CENTER
FOR
THE EDUCATION OF NEGLECTED OR DELINQUENT CHILDREN & YOUTH

About the National Evaluation and Technical Assistance Center for the Education of Children and Youth Who Are Neglected, Delinquent, or At Risk

The mission of the National Evaluation and Technical Assistance Center for the Education of Children and Youth Who Are Neglected, Delinquent, or At Risk (NDTAC) is to improve educational programming for youth who are neglected or delinquent. NDTAC's legislative mandates are to develop a uniform evaluation model for State Educational Agency (SEA) Title I, Part D, Subpart 1 programs; to provide technical assistance to states in order to increase their capacity for data collection and their ability to use those data to improve educational programming for youth who are neglected or delinquent; and to serve as a facilitator among different organizations, agencies, and interest groups that work with youth in neglect or delinquent facilities. For additional information on NDTAC, visit the center's website at **https://neglected-delinquent.ed.gov**.

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This brief is designed for various stakeholders that work with youth with multiple system experiences, specifically for Title I, Part D State coordinators, State Agency and local program staff, Education for Homeless Children and Youth (EHCY) State coordinators and liaisons, and Title I, Part A Foster Care State Education Agencies (SEAs) and Local Education Agency (LEA) points of contact. It provides an overview of the intersection between youth experiences of homelessness, child welfare, and juvenile justice involvement and the federal education programs that support them. The goal of this brief is to encourage collaboration across federal programs and provide key resources to support this intersecting population.

Background

The Prevention and Intervention Programs for Children and Youth Who Are Neglected, Delinquent, or At Risk, as authorized by Title I, Part D of the Elementary and Secondary Education Act of 1965 (ESEA), consists of two subparts. The Subpart 1 State Agency (SA) program was first authorized with Public Law 89-750, the Elementary and Secondary Amendments of 1966. The Subpart 2 Local Education Agency (LEA) program was created in its present form with the Improving America's Schools Act of 1994. The Title I, Part D program statute was most recently amended in 2015 by the Every Student Succeeds Act (ESSA). The goal of the program is to:

- Improve educational services for children and youth who are neglected or delinquent,
- Provide these children and youth with services to successfully transition into further schooling or employment,
- Prevent youth who are at risk from dropping out of school and provide youth who drop out and children and youth returning from correctional facilities with a support system to ensure their continued education and the involvement of their families and communities.

Subtitle VII-B of the McKinney-Vento Homeless Assistance Act, first enacted in 1987, reauthorized in 2015 by Title IX, Part A of the ESSA, establishes the educational rights and protections for children and youth experiencing homelessness. The Act applies to State Education Agencies (SEAs) that are responsible for removing barriers to education for students experiencing homelessness and imposes requirements of all LEAs to identify and serve students experiencing homelessness whether they receive a subgrant from the SEA or not. The legislation also promotes continuity of education for students experiencing homelessness by offering the option of remaining in their school of origin even if they currently reside in a different school district. LEAs must designate a McKinney-Vento liaison for their district who ensures the identification, enrollment, and access to educational services of children and youth experiencing

homelessness. The liaison should participate in professional development offered by SEAs and coordinate outreach and services with other entities and agencies.[1]

Title l, Part A of the ESEA of 1965, as amended by the ESSA in 2015, provides financial assistance to LEAs and schools with high numbers or high percentages of children from low-income families to help ensure that all children meet challenging academic standards. Title I, Part A also require SEAs and LEAs to take steps to minimize school placement changes for students in foster care, and the provisions require educational agencies to collaborate with child welfare agencies to promote educational stability for students in foster care. While there is not an independent funding stream or grant program to support this student population, SEAs and LEAs can use Title I, Part A funds to implement the ESEA's educational stability requirements for students in foster care. In June 2016, the U.S. Departments of Education and Health and Human Services released joint, non-regulatory guidance on ESSA's educational stability provisions.[2]

Together, Title I, Part D, McKinney-Vento, and Title I, Part A Foster Care serve children and youth who are considered neglected, delinquent, or at-risk; students experiencing homelessness; and students who are in the foster care system, respectively. Readers can refer to Appendix A for the definition of each population and the associated federal regulations.

In addition to Title I, Part D, McKinney-Vento, and Title I, Part A Foster Care provisions, the Title I, Part A reservation also provides an opportunity to serve some of these youth [Sec. 1113(c)(3)(A)(i-iii)].

An LEA shall reserve funds to provide comparable services to:

- Homeless children and youth, including providing educationally related support services to children in shelters and other locations where children may live;
- Children in local institutions for neglected children; and
- If appropriate, children in local institutions for delinquent children, and neglected or delinquent children in community day programs.

[1] See NCHE's The Educational Rights of Children and Youth Experiencing Homelessness: What Service Providers Need to Know to learn more about the rights and services for children and youth experiencing homelessness under the McKinney-Vento Act.

[2] Updated non-regulatory guidance on ensuring educational stability for children in foster care is forthcoming and will be updated in this brief once released.

What is the research on the educational challenges of students who have contact with child welfare, juvenile justice, and/or homeless response systems?

Students with multisystem involvement refers to a population of young individuals who come into contact with various public systems such as child welfare, juvenile justice, and homeless response systems. It is imperative for State coordinators and local liaisons to recognize the intricate interplay of these intersecting systems for a significant percentage or number of youth who have been involved with two or more of these systems or programs. State coordinators play a pivotal role in developing and implementing comprehensive, integrated strategies that address these complex issues. The need for federal programs to collaborate with one another is evident when considering that students with multisystem involvement experience cross-cutting educational concerns such as chronic absenteeism, learning disruptions, and school mobility.[3] These "cross-systems" youth or students, who are also included in positive reframing such as "opportunity" or "at promise" youth instead of past negative classifications such as "at risk" or "disconnected" youth, require a comprehensive and integrated approach to ensure they receive the full spectrum of federal and state resources.[4,5] For this section, we outline certain challenges encountered by youth involved in multiple systems. However, it is important to note that this summary is not exhaustive.

First, students who are connected to a single system are more likely to experience other systems if early prevention services are not provided.[6,7] For example, children and youth who experience homelessness are more likely to have been involved with the foster care and/or juvenile justice systems.[8] Ensuring academic continuity in education becomes a critical concern as students with multisystem involvement may undergo frequent and unexpected changes in living arrangements. When they are connected to court systems, legal proceedings in dependency or delinquency court

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[3] Vidal, S., Connell, C. M., Prince, D. M., & Tebes, J. K. (2019). Multisystem-involved youth: A developmental framework and implications for research, policy, and practice. *Adolescent Research Review, 4*, 15-29.

[4] Frameworks Institute (2024). Connections and communities: Reframing how we talk about opportunity youth. A FrameWorks Strategic Brief.

[5] Shefska, D., & Backes, E. P. (2020). Fulfilling the promise of adolescence: applying developmental knowledge to create systems change. *Journal of Youth Development, 15*(3), 27-44.

[6] Palmer, A. R., Piescher, K., Berry, D., Dupuis, D., Heinz-Amborn, B., & Masten, A. S. (2023). Reprint of: Homelessness and child protection involvement: temporal links and risks to student attendance and school mobility. *Child Abuse & Neglect, 139*, 106156.

[7] Modrowski, C. A., Chaplo, S. D., & Kerig, P. K. (2023). Youth dually-involved in the child welfare and juvenile justice systems: Varying definitions and their associations with trauma exposure, posttraumatic stress, & offending. *Children and Youth Services Review, 150*, 106998.

[8] Narendorf, S.C., Brydon, D.M., Santa Maria, D., Bender, K., Ferguson, K.M., Hsu, H-T., Barman-Adhikari, A., Shelton, J., Petering, R. (2020). System involvement among young adults experiencing homelessness: Characteristics of four system-involved subgroups and relationship to risk outcomes. *Children and Youth Services Review, 108*, 104609.

may necessitate sudden shifts in housing, including temporary placements in emergency shelters, detention facilities, or short-term residential facilities. This can hinder a student's ability to engage consistently in their studies and lead to chronic absenteeism and higher school mobility.[9]

Therefore, minimizing school transfers and providing academic support during transitions is a key area of concern. School transfers can result in loss of academic progress, gaps in learning, and difficulties in adjusting to new educational environments.[10] For example, Clemens and colleagues found that greater school changes and out-of-home placements decrease student academic growth in reading, writing, and math.[11] Additionally, the transition process back to the community from out-of-home placements heightens the risk of homelessness as a lack of stable family or supportive system, financial resources needed to secure stable housing, and historical/ongoing trauma exposure may make it difficult to maintain stable housing and future employment.[12,13]

A systematic literature review of school reentry practices found that a lack of coordination among these systems poses significant barriers accessing the supports available to smooth the transition of a youth from one system to another.[14] One critical aspect is the potential delay in transferring or loss of school records. The absence of a transition coordinator exacerbates these issues, limiting students' access to crucial information and complicating their navigation through systems designed to serve them.[15] Even when there are complete records available to transfer quickly from one school to the next, as permitted under the Family Educational Rights and Privacy Act provisions, translating full and partial course credits earned from one school system to another, especially if they cross state lines, can be complicated or uncertain for a period of time.[16] The relationship between the youth and the transition coordinator serves as a motivational

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[9] Garcia, A. R., Metraux, S., Chen, C. C., Park, J. M., Culhane, D. P., & Furstenberg, F. F. (2018). Patterns of multisystem service use and school dropout among seventh-, eighth-, and ninth-grade students. *The Journal of Early Adolescence, 38*(8), 1041-1073.

[10] Gypen, L., Vanderfaeillie, J., De Maeyer, S., Belenger, L., & Van Holen, F. (2017). Outcomes of children who grew up in foster care: Systematic review. *Children and Youth Services Review, 76*, 74-83.

[11] Clemens, E. V., Klopfenstein, K., Lalonde, T. L., & Tis, M. (2018). The effects of placement and school stability on academic growth trajectories of students in foster care. *Children and Youth Services Review, 87*, 86-94.

[12] Walker, S. C., Valencia, E., Bishop, A., Irons, M., & Gertseva, A. (2018). Developing a coordinated youth housing stability program for juvenile courts. *Youth Homelessness, 20*(3), 117-138.

[13] Fowler, P. J., Marcal, K. E., Zhang, J., Day, O., & Landsverk, J. (2017). Homelessness and aging out of foster care: A national comparison of child welfare-involved adolescents. *Children and Youth Services Review, 77*, 27-33.

[14] Kubek, J. B., Tindall-Biggins, C., Reed, K., Carr, L. E., & Fenning, P. A. (2020). A systematic literature review of school reentry practices among youth impacted by juvenile justice. *Children and Youth Services Review, 110*, 104773.

[15] Cole, H., & Cohen, R. (2013). Breaking down barriers: A case study of juvenile justice personnel perspectives on school reentry. *Journal of Correctional Education, 64*(1), 13–35.

[16] National Center for Homeless Education. (2017). Maximizing credit accrual and high school completion for homeless students. https://nche.ed.gov/maximizing-credit-accrual-and-recovery-for-homeless-students/

source of support for students, encouraging students to actively participate in education and employment opportunities post-release.[17] Furthermore, the youth's own commitment and motivation to the transition is an important indicator of a successful transition.[18]

Attending to students' educational needs requires a comprehensive assessment to provide the necessary services and support. Research has shown that students in foster care, when compared to their non-foster care peers, demonstrate a significant gap in achievement of at least 20 percent in reading, writing, and particularly in mathematics.[19] The gap between youth who are experiencing homelessness and students who are economically disadvantaged has consistently been at least 10 percent in reading and math scores.[20] Similar trends among youth in the juvenile justice system revealed that around a third of 10th-grade students were reading below the fourth-grade level and underperforming in math.[21] Without an appropriate academic assessment of students' needs, unmet or unidentified educational needs may lead to learning disruptions. A recent study highlights a concerning oversight in the assessment process for academic proficiency which reveals that between 65 and 75 percent of students in justice facilities were not reassessed for reading or math achievement after 100 or more days in the facilities, respectively.[22]

Furthermore, early recognition of learning disabilities in these populations is paramount to initiate screening and assessments. Due to the frequent housing and school mobility of this population, it is challenging to calculate the exact number of youth who need special education services in the child welfare, juvenile justice, and/or homeless response systems. The National Center for Education Statistics estimate 15 percent of public-school students receive services for an education-related disability during SY 2021-2022.[23] Approximately 20 percent of students

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[17] Mathur, S. R., Griller Clark, H., Hartzell, R. I., LaCroix, L., & McTier Jr, T. S. (2020). What youth with special needs in juvenile justice say about reentry: Listening to their voice. *Youth & Society*, *52*(8), 1501-1522.

[18] Jolivette, K., Swoszowski, N. C., McDaniel, S. C., & Duchaine, E. L. (2016). Using positive behavioral interventions and supports to assist in the transition of youth from juvenile justice Facilities back to their neighborhood school: An illustrative example. *Journal of Correctional Education*, *67*(2), 9–24.

[19] Clemens, E., & Tis, M. (2016). Colorado study of students in foster care. Needs assessment data 2008 to 2014. Greeley, CO: University of Northern Colorado.

[20] National Center for Homeless Education. (2021). Federal data summary: School years 2016-2017 through 2018-2019. Browns Summit, NC: The University of North Carolina at Greensboro. https://nche.ed.gov/wp-content/uploads/2021/04/Federal-Data-Summary-SY-16.17-to-18.19-Final.pdf

[21] Grigorenko, E. L., Macomber, D., Hart, L., Naples, A., Chapman, J., Geib, C. F., ... & Wagner, R. (2015). Academic achievement among juvenile detainees. *Journal of Learning Disabilities*, *48*(4), 359-368.

[22] James, A., Bishop, J.P. (2022). Centering care & engagement: Understanding implementation of the Road to Success Academies (RTSA) in Los Angeles county juvenile court schools. Center for the Transformation of Schools, School of Education & Information Studies: University of California, Los Angeles. https://transformschools.ucla.edu/wp-content/uploads/2022/10/RTSA_Impact-Report_FINAL_8.30.22.pdf

[23] National Center for Education Statistics. (2023). Students with disabilities. Condition of Education. U.S. Department of Education, Institute of Education Sciences. https://nces.ed.gov/programs/coe/indicator/cgg

experiencing homelessness have received services annually since 2019.[24] Therefore, SEAs and LEAs play a crucial role in identifying students suspected of having a learning or other disability and providing appropriate supports. For example, students identified as having a disability through the Child Find process can be served under an IEP or 504 plan. Section 300.11(a)(1)(i) of the Individuals with Disabilities Act (IDEA) mandates that all states have policies and procedures[25] for outreaching to, prescreening, and identifying children with disabilities including children who are homeless[26] or wards of the state. Once identified, IDEA Part B funds can be used to assist states in providing special education and related services to children with disabilities ages three through 21 in accordance with Subchapter II (Part B) of IDEA.

By fostering collaboration and synergy among federal programs, we can create a more holistic support system that empowers youth with multisystem involvement facing complex challenges, ensuring they receive the tailored assistance required for their educational success. In doing so, federal programs can bridge gaps in support, fostering an environment where every eligible student receives the resources essential for their academic and personal development. In this next section, we propose several strategies for collaboration between federal programs.

[24] National Center for Homeless Education, (2023). Student homelessness in America: School years 2019-20 to 2021-22. Browns Summit, NC: The University of North Carolina at Greensboro. https://nche.ed.gov/student-homelessness-in-america-school-years-2019-2020-to-2021-2022/

[25] IDEA provides legal grounds and accountability for identifying and serving Students With Disabilities.

[26] IDEA Parts B and C have coordination requirements with McKinney-Vento and must involve homeless educators in the state advisory panels and intervention coordinating councils.

How can state and local Title I, Part D, EHCY, and Foster Care staff collaborate to serve system-involved youth more efficiently and effectively?

Improving access to services and minimizing disruption to education for system-involved youth must happen across all levels.

At the SEA level:	**Implement policies to minimize educational disruption, especially for students with multi-system involvement.** Students returning from neglected and delinquent facilities are entitled to immediate enrollment if they qualify for services under Foster Care or McKinney-Vento. For those students returning, who do not qualify under either of these programs, SEAs may want to consider working with local LEAs, state board rules, or state legislatures to enact immediate enrollment criteria. *To learn more about educational stability requirements, please see the Non-Regulatory Guidance: Ensuring Educational Stability for Children in Foster Care and the Education for Homeless Children and Youths Program Non-Regulatory Guidance.*	**Build networks and relationships that encourage interagency collaboration and sharing of resources across programs.** Program staff across Title I, Part D, McKinney-Vento, Title I, Part A Foster Care, and the Child Welfare Agency can collaborate and schedule regular meetings to streamline and reconcile policies where possible, so that cross-system youth have a more seamless experience and more consistent rights. In communities with indigenous youth, collaborating with tribal agencies ensures that indigenous children remain connected to their communities and cultures. Other ways to collaborate across programs and agencies are joint trainings for points of contacts for each program, creating interagency workgroups, and data sharing between child welfare and education agencies when appropriate and as permitted by state and federal laws. *Please see Interagency Collaboration to Ensure Educational Stability for Students in Foster Care for more information.*	**Braid Funds with Other Resources and Programs.** Braiding of funds involves bringing together funds from multiple streams to support a common goal. Program staff can encourage braiding of relevant funding streams such as Title I, Part D funds and McKinney-Vento funds, with other federal, state, local, and private funding earmarked for youth experiencing homelessness, in foster care, and/or involved in the juvenile justice system to provide holistic support. Program staff should also creatively explore alternative funding streams that are not specific to highly mobile populations. Other federal funding streams such as Title IV, Part A, Title III, Part A, and 21st Century Community Learning Centers provide an opportunity to creatively address the holistic needs of students with multi-system involvement. *The NCHE resource, Using Funds for Sustainable Impact: A Guide for Education for Homeless Children and Youth Programs, provides more detail on braiding, blending, and layering funds.*

At the Local and LEA Level:	**Ensure that students served by Title I, Part D benefit from educational stability supports.** Supports may include transportation services, best interest determinations, and immediate enrollment provisions as it will lessen chances of dropping out of school or re-offending. *Please see the NCHE resource on School Selection and Best Interest Determination and Transporting Children and Youth Experiencing Homelessness to learn more about the legislation and implementation of the best interest determination process.*	**Collaborate to develop transportation plans, templates, and MOUs.** Staff across these three programs can work together to improve enrollment and records transfer, close service gaps, reduce duplication of efforts, share data, and strengthen support systems for children. *The brief, Supporting Students Experiencing Homelessness Involved in the Criminal Justice System, provides additional information on interagency transition teams.*	**Leverage other federal and non-federal programs such as those offered by community-based organizations, Tribal organizations, local nonprofit, and faith-based organizations to gain access to culturally responsive resources to meet the needs of youth.** These organizations may be able to provide culturally responsive care and wraparound services, beyond what these federal programs can provide. Liaisons can assist and connect parents, guardians, and siblings to education including Head Start or other preschool options, housing, health services, and other resources the family or child may need. *The NCHE resource, A Guide to Effective Collaborations with Community-Based Organizations to Support Students Experiencing Homelessness provides a road map for establishing partnerships with community-based organizations.*

To connect with your colleagues in the following programs, please see the program contact lists:

- Education for homeless children and youth State coordinator contact information
- Title I, Part A foster care points of contact
- Title I, Part D State coordinator contact information page

Lessons from Montana, North Dakota, and Texas

For this resource, NDTAC features the perspectives from Montana, North Dakota, and Texas to showcase collaboration among federal programs (Title I, Part D, McKinney-Vento, and Title I, Part A Foster Care) for students with intersecting experiences of child welfare, juvenile justice, and homelessness involvement. Title l, Part D State coordinators in Montana and North Dakota were interviewed alongside their counterpart in the other federal program. We then feature a perspective from Texas to highlight the variability of collaborating with federal programs, particularly in a larger or more decentralized state. Together, these three states offer diverse approaches and experiences in collaborating with federal programs.[27] We thank the following current and former State coordinators for sharing their knowledge and expertise with us:

- **Montana**: Christy Hendricks (Title I, Part D State coordinator and Title I, Part A Foster Care Point of Contact) and Serena Wright (EHCY State coordinator)
- **North Dakota**: Jennifer Withers (Title I, Part D and EHCY State coordinator) and Michelle Siegfried (Title I, Part A Foster Care Point of Contact)
- **Texas**: Gerardo Ramirez (Title I, Part D State coordinator)

How Federal Programs Collaborate

Across both Montana and North Dakota, the establishment of formalized mechanisms was identified as the most common strategy for promoting collaboration across federal programs. Formalized collaboration fosters a transparent and efficient flow of information through monthly or quarterly meetings with subgrantees and local foster care and EHCY liaisons, as well as data sharing agreements. These mechanisms increase opportunities for relationship building and information exchange so that foster care or EHCY liaisons in the school districts and other stakeholders know who to call for information. They can also alleviate issues with high staff turnover across federal programs and states.

Jennifer and Michelle from North Dakota work closely together to provide ongoing training about Title I, Part D, McKinney-Vento, and Title I, Part A Foster Care to their subgrantees and liaisons. They share recorded trainings and document resources on North Dakota's Department of Public Instruction website. For them, it is imperative that these programs work together as the students supported by all three programs can be categorized as at-risk. Title I, Part D, McKinney-Vento, and Foster Care work together to provide funding for education whether it is supplementing personnel salary, updating technology, or increasing life skills training. Being cross-trained and knowing how each federal program works has been useful for their facilities and school districts to direct questions to the right person. Local liaisons have now built the

[27] For questions about these programs, please reach out to NDTAC or the current State coordinators.

practice of proactively reaching out to State coordinators and their counterparts to share resources that they believe multisystem youth may benefit from.

Christy and Serena in Montana have developed an extensive network of relationships with other offices in the SEA, including the Indian Education for All team, the Special Education department, the Career and Technical Education team, and the Child Welfare Agency (CWA). With these partnerships, they are able to attend each other's conferences and in turn, strengthen relationships. In addition to collaboration at the state level, LEAs and facilities have also adopted the practice of collaborating amongst themselves and with the community. For example, their facilities have cultural awareness for the Native American youth that they serve. They collaborate with the reservations and invite the Elders to develop relationships with and teach the Native American youth about their culture.

Another type of formalized collaboration is developing Memoranda of Understanding (MOUs). Montana is a local control state where the child welfare and education systems operate their own data systems. The SEA and CWA collaborate to identify the population of students with foster care experience. Christy works with the CWA monthly to identify foster youth that are missing or unidentified in Montana's student information system. This partnership ensures that foster care students have the necessary services they are eligible for and minimizes disruption to their education. When this partnership began, there were hundreds of students to track and consolidate records across both agencies; however, with constant monitoring, the numbers decreased to about 12 kids a month. There is now an accurate record of students in foster care at each school. The emphasis on collaboration and support is evident with the implementation of foster care points of contact in every school in Montana per the state law. The partnership between Montana's SEA and CWA provides an opportunity to braid funds from both child welfare and education. They are working together to develop a resource that outlines all the federal education and child welfare funding streams and the various expenses that these funds cover.

MOUs can also be strategically used to solve student transportation to school issues. Due to the rural nature of North Dakota, transportation is a barrier for students to get to school. Using federal funds, several school districts have worked together to designate school bus routes and MOU agreements with taxi/Uber services to mitigate transportation challenges. Moreover, partnerships with gas stations allow caregivers of eligible foster and EHCY students to fill gas at designated gas stations and charge the cost back to the school. These partnerships showcase the commitment to finding creative ways to enhance the overall effectiveness of federal programs and increase school attendance.

Variability in Collaboration and Coordination: The Case of Texas

Collaboration and coordination may look very different across the country. Larger states, in particular, may encounter barriers within their respective governance structures. Gerado from Texas shared that his state operates as a local control state, where significant decision-making

authority in education rests in the LEAs rather than being centralized at the state level. Texas uses a "bottom up" approach, local school districts largely receive support and services from regional Education Service Centers (ESCs), who provide direct support to Title I, Part D Subpart 2 subgrantees, as needed. Texas has 20 regional ESCs which are operated by service organizations[28] (not part of the Texas Education Agency). The goal of regional ESCs is to improve the Texas public education system and promote compliance with state laws and rules, but participation by school districts is voluntary. With this decentralized approach, Texas school districts tailor education to the needs of their communities and form their own partnerships at the local level.

As the Title I, Part D State coordinator, Gerardo's role is to collaborate with the ESCs in providing LEAs, which may include a public school district or an open-enrollment charter school, with the support to connect with local facilities. Each ESC is governed by a seven-member lay board elected by local district board members within each region. These boards develop policies for managing and operating the centers, programs and services offered, and their commissioner has significant authority over the distribution of state and federal funds among the centers. Although Gerardo collaborates and coordinates with the ESCs, the decentralized structure limits his ability to enforce a specific mandate for collaboration and coordination within and across different governance systems and federal programs without proper authority from the state. With these structural differences, Gerado shared that some regions have challenges with federal program collaborations due to concerns with overstepping authority, developing trust, and fear of increasing workload responsibilities. He noted that compliance regulations for collaboration and coordination would have to be mandated to effectively engage with other federal programs at the state level.

Despite the difficulties posed with coordinating and collaborating across different programs, regional ESCs have found varying mechanisms to provide support to school districts and facilities that serve students in Title I, Part D, McKinney-Vento, and Title I, Part A Foster Care populations and do collaborate amongst themselves. ESC Region 20, for example, has a hub spot for resources. Their website describes each federal funding source, links key resources on their webpage, and provides the contact information for the federal point of contacts. In regional ESCs with more established federal collaborations, regular events are posted on their webpage. More established federal collaborations may work together through quarterly homeless and foster care meetings, professional development sessions with Continuing Education Units offered, and sharing resources and upcoming trainings via Padlet.

[28] Service organizations are entities that provide support, resources, and assistance to help schools achieve their educational goals, but do not have the authority to enforce rules, monitor compliance or impose penalties. Therefore, there is no mandate or requirement for schools to engage with regional ESCs. Services in these centers may include technical assistance, professional development for teachers, curriculum resources, and other educational services to enhance the quality and delivery of education.

Based on each state's structure, Gerardo shares that coordination and collaboration can look different as illustrated by the Texas approach.

Advice to State Coordinators

Below we highlight several recommendations from our interviews to advise State coordinators on increasing collaboration opportunities.

- **Building relationship is key: "How can I help you"?** Both Montana and North Dakota placed an emphasis on building new and ongoing relationships with federal programs, school districts, and other stakeholders. This could include holding a quarterly meeting with federal program partners and/or holding "office hours" for foster care and homeless liaisons and local school districts to ask questions, working with school districts to facilitate Best Interest Determinations for immediate school enrollment, selectively joining committees (like a state taskforce on child abuse or a juvenile justice advisory group), and attending conferences to network with folks in the field. Both states also suggest that State coordinators host in-person meetings and think "outside of the box" for creative presentations. As part of their high-tiered Community of Practice, Montana hosts two in-person conferences each year where they invite subgrantees from Title I, Part D, McKinney-Vento liaisons, Title I, Part A Foster Care liaisons, and local stakeholders. In the past, they have coordinated facility tours (like runaway shelters and correctional facilities) for partners to see the work each facility is doing in their programs. In states like Texas, Gerado recommends building connections with various partners and developing trust. Knowing who to contact is a starting point. Another way to build relationships with different partners is to access professional development opportunities, trainings, and attend training provided by the regional ESCs.
- **If a formalized collaboration mechanism is not in place, find ways to distribute information and resources.** State coordinators can host virtual trainings and document resources online. Jennifer and Michelle worked together to create online handbooks for Title I, Part D and McKinney-Vento because North Dakota did not have a handbook in place. Christy and Serena from Montana provide monthly webinar trainings such as "Back to Basics" on federal funding programs and invite guest speakers. They also shared that distributing resources to their counterparts on the Indian Education for All team has opened doors for relationship building and collaboration because many of the students served through the three programs are Native American. Gerardo from Texas also shared that highlighting various programs, sharing their websites and resource pages, points of contact, and any associated training is helpful to form new partnerships. For example, due to increasing concerns for certain student populations, such as students over the age of 18 experiencing homelessness and those with experiences of sex trafficking, collaborative efforts and increased community support is necessary to ensure the well-being of vulnerable youth. States may consider sharing resources about special student

populations and suggest potential collaborations with law enforcement agencies, Tribal educational agencies, and community-based organizations to engage in more targeted outreach to stakeholders.

- **Map how federal funds in your state are coordinated to provide educational stability for students.** Montana recommends mapping how federal funds intersect with each other at the state level. Without directions, it can be unclear to subgrantees how Title I, Part D, McKinney-Vento, Title I, Part A Foster Care, and other federal funds serve students. State coordinators can work with their counterparts in other federal programs as well as school districts to strategize the distribution of funds so that program staff and administrators understand what each funding stream can cover.

Conclusion

This brief underscores the importance of collaboration among various federal programs, namely Title I, Part D, McKinney-Vento, and Title l, Part A Foster Care to address the multifaceted educational needs of students with multisystem involvement. By recognizing the complex interplay between child welfare, juvenile justice, and homeless response systems, State coordinators and local liaisons can develop and implement integrated strategies that bridge gaps in support and break down silos. Ultimately, fostering collaboration not only ensures the effective utilization of resources but also creates an environment where every eligible student receives the comprehensive support needed for their educational and personal development.

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Appendix A. Defining the Population

Neglected, delinquent, or at-risk (Title I, Part D)	A child who is neglected is defined as one who has been placed in "a public or private residential facility, other than a foster home, that is operated for the care of children who have been committed to the institution or voluntarily placed in the institution under applicable state law, due to abandonment, neglect, or death of their parents or guardians." [Sec. 1432(4)(A)] A child who is delinquent is one who has been placed "in a public or private residential facility for the care of children who have been adjudicated to be delinquent or in need of supervision." [Sec. 1432(4)(B)] The term at-risk is used with respect to a child, youth, or student, means a school aged individual who is at-risk of academic failure, dependency adjudication, or delinquency adjudication, has a drug or alcohol problem, is pregnant or is a parent, has come into contact with the juvenile justice system or child welfare system in the past, is at least 1 year behind the expected grade level for the age of the individual, is an English learner, is a gang member, has dropped out of school in the past, or has a high absenteeism rate at school. [Sec. 1432(2)] **Learn More** • New State Coordinators Resources Hub • Transition Toolkit 3.0: Meeting the Educational Needs of Youth Exposed to the Juvenile Justice System • Supporting Students Experiencing Homelessness Involved in the Criminal Justice System • Dear Colleague Letter on Immigrant Students with Disabilities, Who Are English Learners, and/or Experiencing Homelessness [ED]

Homeless (McKinney-Vento)	Students who lack a regular, fixed and adequate nighttime residence, including students who are: • Sharing housing due to loss of housing, economic hardship, or a similar reason (doubled up) • Living in motels, hotels, (hotel/motel) trailer parks, camping grounds (unsheltered) due to a lack of alternative, adequate accommodation • Living in emergency and transitional shelters (sheltered) • Abandoned in hospitals (sheltered) • Living in public or private places not designated or ordinarily used as regular sleeping accommodations for human beings (unsheltered) • Living in cars, parks, public spaces, abandoned buildings, bus or train stations or similar situations (unsheltered) • Migratory children living in the above situations Moreover, unaccompanied homeless youth is defined as: • Student's living arrangement must meet the definition of homeless, AND • Student must be considered unaccompanied, defined as "not in the physical custody of a parent or guardian." **Learn more** • Determining McKinney-Vento Program Eligibility • The Educational Rights of Children and Youth Experiencing Homelessness: What Service Providers Need to Know • A Guide to Effective Collaborations with Community-Based Organizations to Support Students Experiencing Homelessness • YHDP: Youth Homelessness Demonstration Program - HUD Exchange
Foster Care (Title I, Part A)	ED follows the definition of "foster care" established by the U.S. Department of Health & Human Services for the Title IV-E foster care program per 45 CFR 1355.20. *Foster Care* means 24-hour substitute care for children placed away from their parents or guardians and for whom the child welfare agency (CWA) or Tribal agency has placement and care responsibility. Foster Care includes placements in foster family homes, kinship providers, group homes, emergency shelters, residential facilities, childcare institutions, and pre-adoptive homes. **Learn more** • Students in Foster Care - Office of Elementary and Secondary Education • Non-Regulatory Guidance: Ensuring Educational Stability for Children in Foster Care [ED/HHS] • Dear Colleague Letter on Interagency Collaboration [ED] • Information Memorandum on Interagency Collaboration between Child Welfare and Educational Agencies to Support Academic Success of Children and Youth in Foster Care [HHS] • Dear Colleague Letter on Addressing the Complex Needs of Dually Involved Youth [CB/OJJDP]

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