The Elementary and Secondary Education Act (ESEA), as amended by Every Student Succeeds Act of 2015 (ESSA), requires local educational agencies (LEAs) receiving Title I, Part A funds to develop agreements with Head Start and, if feasible, other early childhood development programs to increase coordination in communities. Similarly, the Head Start Act, as amended by the Head Start for School Readiness Act of 2007, requires Head Start programs to enter into agreements with LEAs and other early childhood providers. The goal of this coordination is to provide higher quality learning experiences and improve education and other outcomes for children and families experiencing homelessness.

Subtitle VII-B of The McKinney-Vento Homeless Assistance Act authorizes the federal Education for Homeless Children and Youth (EHCY) Program and is the primary piece of federal legislation related to the education of children and youth experiencing homelessness. ESSA also amended the McKinney-Vento Act’s EHCY program, which directs LEAs in their implementation of ESSA for students experiencing homelessness, in several important ways to increase access to preschool programs. It requires that every LEA designate a liaison with specific responsibilities, including ensuring that children experiencing homelessness are identified and receive educational services for which they are eligible, including Head Start, Early intervention (IDEA Part C), and preschool programs administered by the LEA. In addition, children experiencing homelessness can enroll immediately in LEA-administered preschools (if space is available) without typically-required documents; continue attending their LEA-administered preschool even if they move out of the attendance area; and receive transportation to LEA-administered preschool in many cases. Note that LEA-administered preschool programs may be funded by the Office of Head Start. Here is more information about which preschool programs are covered by the McKinney-Vento Act and how to apply the Act to LEA-administered preschool programs.
U.S. Department of Education (ED) guidance on the EHCY program further supports collaboration between LEAs and Head Start programs. The guidance directs homeless liaisons to contact agencies responsible for administering Head Start and discuss ways of coordinating referrals, and it encourages liaisons to work with early childhood education partners to identify homeless preschool-age children. More generally, the guidance states that it is important for EHCY State Coordinators and local liaisons to coordinate (with other education and community agencies) and gives several reasons for doing so: to facilitate consistent eligibility criteria across agencies serving the same families, children, and youths; to coordinate or expedite referrals for services; and to coordinate services overall for families or youths in order to improve education and other outcomes for homeless children and youths.

Regulations for Head Start and Early Head Start programs are provided through the Head Start Program Performance Standards (45 CFR Chapter XIII). Head Start promotes school readiness of children under five from low-income families through education, health, social, and other services. The Head Start Act and the Head Start Program Performance Standards include requirements for serving children and families experiencing homelessness, including enrollment, outreach, and collaboration.

All LEAs and Head Start programs should maintain formal working agreements that clarify how they will work together to comply with the federal requirements in Title I, Part A, the Head Start Act, and the McKinney-Vento Act. Such agreements should be tailored to meet the community’s unique needs and reflect a comprehensive approach, rooted in best practices.

This document summarizes legal requirements pertaining to coordination between LEAs and Head Start and includes a list of potential actions and activities that can be used to achieve coordination of services for children experiencing homelessness. Each summary is organized by topic to assist in embedding policies and practices to serve young children experiencing homelessness into each agency’s broader formal agreement between the LEA and Head Start.
REQUIREMENTS AND OPPORTUNITIES

Eligibility

- LEAs are required to use the definition of homelessness in Subtitle VII-B of the McKinney-Vento Homeless Assistance Act.[1]
- Head Start is required to use the definition of homelessness provided by Subtitle VII-B of the McKinney-Vento Homeless Assistance Act.[2]
- Homeless children are categorically eligible for Head Start[3], regardless of income, as well as LEA-administered preschool services under Title I, Part A.[4]

Enrollment and Records

- LEAs must maintain the child’s preschool of origin if it is in the child’s best interest[5]; Head Start must make efforts to maintain the child’s enrollment, according to the family’s needs, regardless of whether the family or child moves.[6]
- LEAs must provide for immediate enrollment in a new school if remaining in the preschool of origin is not in the child’s best interest[7]; Head Start must transition the child to a program in their service area, according to the family’s needs.[8]
- Head Start may reserve one or more enrollment slots, up to three percent of funded enrollment, for pregnant women and children experiencing homelessness when a vacancy occurs.[9]
- LEAs must review and revise policies to remove barriers to the identification, enrollment, and success of preschool children who are homeless.[10] Head Start’s policies and procedures cannot require families to provide documents that confirm a child’s age, if doing so creates a barrier for the family to enroll the child.[11] In addition, to give the family reasonable time to present these documents, Head Start programs must allow homeless children to attend for up to 90 days or as long as allowed under state licensing requirements, without immunization and other records.[12]
- If a homeless child transfers schools, the new school must contact the school of origin to obtain relevant academic and other records.[13]

Data and Needs Assessments

- Head Start programs must conduct a community needs assessment, at least every five years and update the assessment annually to reflect any significant changes, using data that includes children experiencing homelessness “in collaboration with, to the extent possible, McKinney-Vento Local Education Agency Liaison.[14]
- LEAs that apply for McKinney-Vento subgrants must conduct an assessment of the educational and related needs of homeless children.[15] LEAs may also consider including the number of homeless children enrolled in early childhood education and other preschool programs.
Coordinating Services/Communication

- LEAs must ensure homeless children have access to Head Start programs, early intervention services under Part C of the Individuals with Disabilities Education Act, and other preschool programs administered by the LEA. [16]
- LEA liaisons must ensure that homeless families and children receive referrals to health care services, dental services, mental health and substance abuse services, housing services, and other appropriate services. [17]

Transition

- Head Start must make efforts to support effective transitions to other Early Head Start and Head Start programs when families experiencing homelessness must relocate out of the program service area. If Early Head Start or Head Start programs are not available, the program should assist the family to identify another early childhood program that meets their needs. [18]
- Head Start may continue to serve families experiencing homelessness until the end of the program year, even if they move out of the program service area, if it is the best interest of the child.
- If a homeless child transfers schools, the new school must contact the school of origin to obtain relevant academic and other records. [19]

Professional Development

- LEAs liaisons must ensure that school personnel providing services under the McKinney-Vento Act receive professional development and other support. [20]

Facilities and Transportation

- LEAs must provide transportation to and from the preschool of origin at a parent/guardian’s request. [21]
- LEAs also must provide transportation services to homeless children comparable to those provided to other children. [22]
- Head Start programs must utilize community resources, where possible, to provide transportation if a child experiencing homelessness is unable to attend a Head Start program regularly because the family does not have transportation to and from the program facility. [23]
POTENTIAL ACTIONS AND ACTIVITIES

The following Head Start and LEA potential actions and activities relate specifically to coordination of services for children experiencing homelessness. They are listed by topic so that they can be referenced and formally embedded into each agency’s broader formal agreement.

Identification, Data, and Records Sharing

- Ensure accurate use of the McKinney-Vento definition of homelessness to identify children experiencing homelessness, and across all LEA and Head Start data collection systems.
- Share and monitor data on homelessness to understand community needs and trends.
- Combine and report out data on homelessness to LEA and Head Start leadership, community partners, coordinating councils, and others to enhance community planning efforts.
- Use collective Head Start and LEA homelessness data to direct expansion opportunities, such as Preschool Development Grants, State PreK, and similar opportunities, to ensure the needs of children experiencing homelessness are included in such plans.
- Develop and implement a systematic procedure for transferring records, with parental consent, from a Head Start program and/or other early childhood program to the LEA.
- Ensure seamless sharing of records from the school of origin when it is in the child’s best interest to enroll in another preschool, school, or district.
- Collaborate to determine and verify eligibility, including gathering documents.

Coordinating Services/Communication

- Formalize collaborative relationships by articulating activities on interagency agreements and memoranda, serving on one another’s advisories, attending one another’s meetings, co-hosting events, providing space for outposted staff, and similar activities.
- Establish regular channels of communication by creating expedited referral processes, sharing contact information, designating primary contacts at Head Start and Early Head Start programs, and having brochures, applications, email lists, and contact information available for staff and families.
- Ensure younger siblings of school-aged students are routinely referred to Head Start and Early Head Start.
- Partner to connect families to a wide range of services in the community.
- Work together to create transportation plans and develop transportation resources to reduce absences and maintain access to the school of origin.
- Share Head Start and LEA resources with one another to help increase stability, or to ensure smooth transition when change is in the best interest of the child; create a protocol for sharing eligibility and other documentation, keeping records up-to-date, and sharing transportation resources.
Transition

- Include a discussion of housing circumstances (homeless status) in planned transitions to assure identification by the LEA and access to supports.
- Include McKinney-Vento liaisons in activities and plans related to transition to kindergarten each year.
- When it is in the best interest of the child to transition to a kindergarten in a school other than the typical receiving school or district, ensure seamless sharing of records from the school of origin.
- Address transitions that occur during the school year when families must relocate as a result of their homelessness, or as a result of obtaining housing.
- Explore ways for children transitioning away from their peer group to transition smoothly into new peer relationships.
- Work together to identify barriers to seamless transitions and advocate together for policies and practices that ease transitions during the school-year and into kindergarten for children and families.

Professional Development

- Partner to offer training to providers, families and communities on the McKinney-Vento definition of homelessness, the importance of education for young children experiencing homelessness, and how to address barriers to access and regular participation in quality services.
- Share LEA and Head Start training resources, materials, and opportunities, and consider co-hosting, co-sponsoring, co-funding, and/or co-training at joint training events.

Curriculum and Instruction

- Work together to ensure that any approved or required curriculum is adapted to meet the unique needs of children experiencing homelessness and includes accommodations for absenteeism, mobility, and a variety of housing arrangements.

Services for Children with Disabilities

- Coordinate identification and supports to increase access to and ongoing participation in services for children with disabilities and their families experiencing homelessness.
- Ensure interagency agreements adapt service delivery to children who are eligible under IDEA and are also experiencing homelessness.
- Work together to offer screening and early identification in shelters and other community settings using procedures and tools that are appropriate for families experiencing homelessness.
Family Engagement

- Develop and implement a family outreach and support program that accommodates the unique needs of families experiencing homelessness to enhance the continuity of family engagement between Head Start and schools and to ensure that families understand the importance of involvement in their children’s academic success.

**Note:** North Carolina’s ESSA Title I, Part A and Head Start Act LEA (Local Education Agency) Head Start Coordination Guidance provided the template for this tool and is recommended to LEAs and Head Start agencies to develop or update the broader overall LEA-HS MOUs required by ESSA and HSPPS to articulate the many opportunities to work together in supporting children, families and communities. Access the North Carolina document [here](#) or on page 9 (Attachment #1).

**RESOURCES**

- **NHSA Toolkit:** New Early Childhood Coordination Requirements in the Every Student Succeeds Act (ESSA) A Toolkit for State and Local Educational Agencies, Head Start Programs, and the Early Childhood Field
- **The Head Start Program Performance Standards and Homelessness**
- **Education for Homeless Children and Youth Program:** Non-regulatory Guidance (Updated August 2018)
- **Title I, Part A of the Elementary and Secondary Education Act and Children and Youth Experiencing Homelessness**
- **Preschool to Prevent Homelessness:** Research, Rights, and Resources
- **Federal Child Care Regulations and Homelessness**
- **Transition to Kindergarten**:
  - [https://eclkc.ohs.acf.hhs.gov/transitions](https://eclkc.ohs.acf.hhs.gov/transitions)
- **Interactive Learning Series. Supporting Children and Families Experiencing Homelessness.**
- **Key Resources:** Children and Families Experiencing Homelessness
- **Supporting Families Experiencing Homelessness Three-Part Webinar Series.**

**Acknowledgements:** Thank you to the Head Start State Collaboration Office Learning Community on Homelessness. Our monthly calls offered a forum for sharing the accomplishments of Head Start grantees and LEAs in their states, their challenges and hopes, which resulted in a wide range of models, possibilities and opportunities for working better together. A special thank you to Karen McKnight, Director of North Carolina’s Head Start State Collaboration Office, who generously shared her state’s initiative to convene regional meetings of Head Start grantees and LEAs to revisit and update existing agreements to better align with new provisions in The Elementary and Secondary Education Act (ESEA), as amended by Every Student Succeeds Act (ESSA) and Head Start Program Performance Standards (HSPPS). The North Carolina coordination guidance document was a valuable template on which to build. Thanks also to staff at the National Center on Parent, Family and Community Engagement for their ongoing partnership to ensure the experience of homelessness is represented in their resources for staff, families and communities. Our collective efforts continue to be enriched by a spirit of collaboration.
Footnotes

[1] 42 USC §11434a(2)
[2] 45 CFR §1305.2
[8] 45 C.F.R. §§1302.15(b)(3), 1302.72(a)
[12] 45 C.F.R. §1302.16(c)(1).
[18] 45 C.F.R. §1302.72(a).
[22] 42 U.S.C. §§11432(g)(4)(A)
[23] 45 C.F.R. §1302.16(c)(2).
ESSA Title I, Part A and Head Start Act
LEA (Local Education Agency)/Head Start Coordination Guidance

The ESEA, as amended by the Every Student Succeeds Act (ESSA), requires LEAs receiving Title I funds to develop agreements with Head Start and, if feasible, other early childhood development programs, such as Exceptional Children, NC Pre-K, and private childcare, to increase coordination. The Head Start Act also requires Head Start programs to enter into agreements with LEAs and other early childhood providers. The goal of this coordination is to provide higher quality learning experiences and a more seamless transition to kindergarten.

Agreements should be tailored to suit the community’s unique needs and consider a comprehensive approach, rooted in best practices. The following activities must be addressed in a formal agreement between the LEA and Head Start.

Requirements:
Check to indicate that each activity, referred to under Section 1119 of ESSA and Section 642 of the Head Start Act regarding coordination requirements, has been addressed in a formal agreement:

Data and Records Sharing
☐ Developing and implementing a systematic procedure for transferring records, with parental consent, from a Head Start program and/or other early childhood program to the LEA.

Coordinating Services/Communication
☐ Designating leaders responsible for the oversight and implementation of the agreement.
☐ Establishing regular channels of communication between school staff and their counterparts (including teachers, administrators, social workers, and health staff) in Head Start agencies or other early childhood education programs, as appropriate, to facilitate coordination of programs.
☐ Sharing information on selection priorities for eligible children to be served by programs.
☐ Sharing information on program service areas.
☐ Coordinating public information dissemination and access to programs for families.
☐ Coordinating the provision of additional services to meet the needs of working parents (such as before and after school care).
☐ Coordinating the provision and use of facilities, transportation or other programs.

Transition
☐ Establishing comprehensive transition policies and procedures that support children transitioning to school, which could address sharing formative assessment data and summer enrollment programs.
☐ Conducting meetings involving families, preschool/kindergarten/elementary school teachers, and Head Start teachers or, if appropriate, teachers from other early childhood education programs, to discuss the developmental and other needs of individual children.

Professional Development
☐ Coordinating, organizing and participating in joint training of staff, including transition-related training of school staff, Head Start program staff, and, where appropriate, other early childhood education program staff. Other topics could include academic content standards, instructional methods, curricula and formative assessment, social and emotional development, and racial equity and implicit bias.
☐ Coordinating program technical assistance (such as shared opportunities for preschool pyramid model coaching).

Curriculum and Instruction
☐ Linking the educational services provided by the LEA and by local Head Start agencies.
☐ Coordinating educational activities, curricular objectives, instruction, and formative assessment.
Services for Children with Disabilities
☐ Developing coordinated procedures for:
   ☐ Referral and evaluation processes
   ☐ Service coordination
   ☐ Least restrictive environment/reduction of dual enrollment
   ☐ Transition services, including from early intervention and to kindergarten
   ☐ Participation in the development of the Individual Education Plan (IEP)
   ☐ Implementation of the IEP

Family Engagement
☐ Developing and implementing a family outreach and support program to enhance the continuity of family engagement between Head Start and schools and ensure families understand the importance of involvement in their children’s academic success.

Practices Supporting Coordination:

<table>
<thead>
<tr>
<th>Activities to Support Effective Agreements</th>
<th>Characteristics of a Strong Agreement</th>
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</thead>
<tbody>
<tr>
<td>• Conduct a local level self-assessment on coordination practices (See Toolkit in Resources list, below)</td>
<td>• Identifies the LEA, Head Start, and early childhood programs covered by the MOU</td>
</tr>
<tr>
<td>• Engage a broad coalition of local stakeholders</td>
<td>• Includes a vision, goals and/or purpose of the MOU (the why)</td>
</tr>
<tr>
<td>☐ LEA, including principals and teachers</td>
<td>• Outlines the major activities to meet the coordination requirements</td>
</tr>
<tr>
<td>☐ Head Start</td>
<td>• Describes the roles and responsibilities of each agency</td>
</tr>
<tr>
<td>☐ Smart Start</td>
<td>• Describes the methods of communication</td>
</tr>
<tr>
<td>☐ NC Pre-K</td>
<td>• Provides a realistic timeline for implementing the activities</td>
</tr>
<tr>
<td>☐ Private child care</td>
<td>• Includes implementation and oversight</td>
</tr>
<tr>
<td>☐ Exceptional Children</td>
<td>• Describes the length or term of the agreement</td>
</tr>
<tr>
<td>☐ McKinney Vento (for homeless children and youths)</td>
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<tr>
<td>☐ Foster Care</td>
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<td>☐ Health care providers</td>
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<td>☐ Families</td>
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<tr>
<td>☐ Other community stakeholders (literacy programs, CCR&amp;R, before and after school programs, etc.)</td>
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<tr>
<td>• Discuss coordination at agency board meetings or local advisory councils</td>
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<tr>
<td>• Draft coordination agreements</td>
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<td>• Review and update annually, or more often as needed</td>
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<tr>
<td>• Include evaluation or measures of success to inform needed changes</td>
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</tbody>
</table>

Resources:
Toolkit: New Early Childhood Coordination Requirements in ESSA
Coordination Requirements in Head Start Act and ESSA

For more information contact:

| Carla Garrett, Title I Preschool Consultant | Danielle Ewen, Principal
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| NC Department of Public Instruction       | NC Early Childhood Foundation
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*Not to be considered legal advice. Some content edited for clarity and brevity. See Coordination Requirements for specific language. Follow the procedures of the organization/LEA for developing and approving MOUs.
McKinney-Vento Definition of Homeless

The McKinney-Vento definition of homelessness used by all public schools in the United States includes children and youth who lack a fixed, regular, and adequate nighttime residence. This definition includes children and youth living in shelters, transitional housing, cars, campgrounds, motels, and sharing the housing of others temporarily due to loss of housing, economic hardship, or similar reasons. It is the same definition of homelessness used by Head Start, child nutrition, and other federal programs serving families and youth.

Here’s some info about serving young homeless children:

- Homeless children are automatically eligible for Head Start and public preschool programs.
- If a program has openings, homeless children must be immediately enrolled even if they lack documents typically needed for enrollment, e.g., proof of age or immunization, and even if they missed an application or enrollment deadline.
- Programs can prioritize and even hold slots open for homeless students.
- For students who become homeless after enrollment, the program where they are enrolled at that time becomes their school of origin. The same is true for a student who is already homeless and then moves into another homeless situation. In either case, if it is in their best interest, children can remain in that program and are entitled to receive transportation provided or arranged by the LEA(s), even if they move outside the attendance zone or school district. If it is not in the student’s best interest to remain in the school of origin, the program where the child is enrolled should help facilitate the student’s transition to a program serving the area where they are currently staying.

Here are some things to consider for your MOU when serving children experiencing homelessness:

- Meet with the homeless liaison in the local education agency to discuss training opportunities, resources, and strategies for working together to develop the MOU.
- Identify activities and trainings to conduct with the homeless liaison on each other’s programs for outreach and identification of children. Examples of activities include parent nights, community fairs, and enrollment events.
• Ensure young children experiencing homelessness are addressed consistently in both the LEA and preschool professional development activities.
• Determine parameters for sharing information with each other and with service organizations.
• Include the sharing of data on students and the program for increasing awareness, applying for funding, building collaboration efforts, and supporting student educational needs.
• Create a common enrollment form for schools, preschool programs, and community service providers, e.g., shelters, food banks, etc.
  o This can include a release for parent to authorize sharing information.
• Design a protocol for identifying homeless children in school (e.g., homeless parent enrolls child in preschool program but also has school-age children or vice versa) and in the community (what a service provider should do when they encounter a homeless family with children).
• Develop a process to refer families for education and community services such as housing assistance and counseling for trauma.
• Incorporate transition meetings with the school district liaison for families experiencing homelessness.

For more information visit:
National Center for Homeless Education’s information page on early education at:
https://nche.ed.gov/preschool-early-childhood/
or
NC Homeless Education Program at:
https://hepnc.uncg.edu/