

Chapter Five: Enrolling Homeless Students



Enrolling homeless students is a core concept in the McKinney-Vento Act as the law’s purpose is to ensure that every homeless child or youth has equal access to a free, appropriate, public education. The term *enrollment* is a critical part of the law and is defined as, “attending classes and participating fully in school activities” [42 U.S.C. § 11434(a)(1)]. Schools are required to enroll homeless students immediately, even if they have missed application or enrollment deadlines while experiencing homelessness and regardless of what point in the school year in which a homeless student presents for enrollment.

In addition to enrolling students in the general education program, local liaisons are to ensure that homeless students receive educational and related services for which the families and students are eligible. As a result, homeless students should be enrolled in any program operated by the school that is appropriate for the student’s needs, such as the school meals program, services through Title I, Part A, school transportation, and preschool programs administered by the local educational agency. It is important to note that homeless students are eligible for Title I Part A services even if they are not attending a Title I school [20 U.S.C. § 6315(c)(2)(E)]. Local liaisons also must ensure access to community-based programs such as Head Start (including Early Head Start), other public preschool programs, early intervention services under part C of the Individuals with Disabilities Education Act (IDEA) (20 U.S.C. 1431 et seq.), and healthcare, dental, mental health and substance abuse services, and housing services that facilitate school attendance or success. It is appropriate to provide these referrals at the time of enrollment. (See Chapter 7 Transportation for more information and Chapter 16 Related Legislation and Guidance for more information on other school services.) Also, students must be enrolled immediately.

Section 5.1 Documents Required for Enrollment

Students experiencing homelessness often do not have documents or records that are typically required for school enrollment. The McKinney-Vento Act recognizes that students often do not have the usual

documentation at the time of enrollment and requires schools to enroll homeless students even if they do not have paperwork normally required. Liaisons or other appointed staff should follow up with the family and assist them with obtaining school, immunization, or health records needed by the school.

Districts should review and revise enrollment policies to allow for reasonable flexibility regarding enrollment documentation. For example, districts often require “reasonable proof of date of birth” at the time of enrollment. While a birth certificate would obviously meet this need, other options could include medical records that include a date of birth, baptismal records, passports, or other government issued documentation. Additionally, the limited resources of homeless families can make it especially difficult for parents or guardians to make unplanned visits to the school, especially if it requires them to miss work. As a result, to the extent possible, schools should gather all necessary documents, complete required forms, and make appropriate referrals at the time of the initial visit to the school for enrollment.

Section 5.2 Placing Students in Classrooms Without Records

To maximize continuity and minimize disruption, immediate enrollment and appropriate placement decisions require a quick analysis of information available about the student being enrolled. A quick analysis of student needs can start with whatever information is readily on hand. LEAs should request records immediately from the schools that students attended previously. For those students, whose records might be unavailable or possibly even damaged or missing due to a natural disaster, it is incumbent upon receiving schools to begin building new student records based on information gathered from parents, students, local district or state-level student databases, and any other reliable sources of student information. While waiting for records to arrive, phone or email conversations with teachers and school counselors may assist liaisons in determining which classroom is an appropriate placement for students. Similarly, doctors, nurses, or psychologists involved in the evaluation and development of an Individualized Education Program (IEP) can also help schools determine the most appropriate classroom placement. Report cards, tests, and homework assignments provided by families or youth can be good sources of information as well.

Sample questions for parents include:

- Do you have any papers from the previous school, such as notes from teachers, homework assignments, tests, progress reports, or any other papers?
- Have you worked with your child on any recent homework assignments? If so, what were the assignments about?
- What were your child's grades like? What does your child find easy? Difficult?
- Did you ever go to a meeting at school with a lot of teachers, a doctor, or someone from the school district office?
- Did you ever sign any papers that talked about goals for your child or special school services?
- How many students were in your child's classroom?
- How many teachers were in your child's classroom?

Sample questions for students could include:

- What was your school day like at your former school?
- What were you learning in your math/history/science/language class?
- What did you find easy? Difficult?
- What were some of your recent homework assignments? Do you have any old homework assignments, tests, notes from teachers, or other papers from school?
- What was the name of your math/history/science/language class?
- Did you ever spend time alone or in a small group with a different teacher?
- Did you ever spend time alone or in a small group in a different classroom?
- What were your grades like?

Many textbooks have placement tests and chapter or unit pretests. These can often be used quickly and easily by classroom teachers to guide instructional placement decisions. Ultimately, homeless students must be placed into the classes that seem most appropriate at the time of enrollment, with adjustments made later based on new information, if necessary.

Section 5.3 Enrolling Unaccompanied Homeless Youth

Due to the recognition of unaccompanied homeless youths by the McKinney-Vento Act, it is important to note that the absence of a parent or guardian is not sufficient reason to delay or deny enrollment.

Unaccompanied homeless youth who are completely on their own or staying with a non-custodial caregiver must be enrolled immediately. Conditional enrollment based on the requirement that an adult obtain legal guardianship or custodianship within a set amount of time directly contradicts the law.

Liaisons are specifically charged with ensuring that unaccompanied homeless youth are aware of the educational and related opportunities available to them. Liaisons should discuss the options for enrollment with unaccompanied youth and ensure they receive assistance with making enrollment decisions, giving priority to the youth's wishes.

Caregiver forms, which outline who can act on behalf of an unaccompanied youth in educational matters, can be very helpful during enrollment and when making educational decisions for the students. As your district develops new forms or revises existing ones, language that creates enrollment barriers or delays should be avoided.

Section 5.4 Other Considerations

In addition to the McKinney-Vento Act, other state and federal laws may dictate the process used to enroll homeless students. For example, the Family Educational Rights and Privacy Act (FERPA) outlines to whom records can be released and under what conditions, which can be especially important when enrolling students who are survivors of domestic violence. FERPA does allow for the transfer of records from one local educational agency (LEA) to another without parental consent, as long as the LEA has made a reasonable attempt to notify the parent of the disclosure or includes in the district's annual FERPA notification to parents that school records will be forwarded to enrolling schools. This allows districts to easily get records needed for unaccompanied homeless youth.

IDEA contains specific timelines that begin as soon as students with disabilities enroll; working with the district's special education department can ensure a smooth transition for homeless students who have disabilities.

Along with working with other laws and policies, local liaisons also often need to work closely with local truancy officers or state attendance officers and may want to consult with them regarding state compulsory education law, state mandated caregiver forms, and other similar issues.

Unfortunately, some students will present themselves for enrollment at a point during the semester or school year at which it would be impossible for students to accrue credits for classes under normal circumstances. In this instance, schools must still allow the student to enroll in and attend school and participate in school activities. Meanwhile, local liaisons must ensure students receive appropriate credit for full or partial coursework satisfactorily completed while attending a prior school. That could include providing partial credits for completed work, providing mastery-based credits, using credit recovery programs, chunking credits, or possibly using summer school opportunities to make up for lost school time.

Section 5.5 Useful Links

Issue Brief: *Enrollment*

<https://nche.ed.gov/downloads/briefs/enrollment.pdf>

Issue Brief: *Prompt and Proper Placement: Enrolling Students Without Records*

<https://nche.ed.gov/downloads/briefs/assessment.pdf>

Issue Brief: *When Legal Guardians are not Present: Enrolling Students on Their Own*

<https://nche.ed.gov/downloads/briefs/guardianship.pdf>