

On September 5, 2017, the following comments were submitted by Columbia Legal Services to the State of Washington Office of Superintendent of Public Instruction on behalf of Schoolhouse Washington and The Mockingbird Society.

Thank you for the opportunity to comment on the Office of the Superintendent of Public Instruction's (OSPI) draft Every Student Succeeds Act (ESSA) State Plan. I submit these comments on behalf of Schoolhouse Washington and The Mockingbird Society. Schoolhouse Washington is a partnership of Columbia Legal Services and Building Changes that improves housing stability and advances educational success for students experiencing homelessness. The Mockingbird Society is an advocacy organization working with youth and families to improve foster care and end youth homelessness.

We appreciate the opportunity to comment a second time, and we commend OSPI for a strong state plan that addresses our concerns. For example, on page 18 of the ESSA State Plan, OSPI does a commendable job in stating the ways that it will track and report performance data for migrant, homeless, and foster children as well as military dependents. We have only two areas of comment: first, measuring graduation rates for students experiencing homelessness, and second, McKinney-Vento rights.

1. Homelessness: Graduation Rates, Long Term Goals and Measurements (Section 1)

The State Plan's Long Term Goals and Measurement of Interim Progress proposes to close the educational opportunity gaps for subgroups that have been historically underserved, including students of color, English language learners, students receiving special education services, and low-income students. See Title I, Part A, page 28 Appendix A, page 150. However, students experiencing homelessness are notably missing.

While we recognize that ESSA does not require the tracking of homeless youth as a separate category, there are important policy reasons to track these youth. Title I, Part A, pages 26 et seq. addresses long-term goals and measurements for graduation rates, stating that the State's goal is to "de-emphasize schoolwide graduation rates, and instead focus on closing gaps in graduation rates by subgroup." (p. 27). Students experiencing homelessness currently have an abysmal 51.9% graduation rate.¹ We recommend that the State Plan include students experiencing homelessness as a separate subgroup so that their academic success will not be masked, and so that they can join their peers in being on track to proficiency standards by 8th grade and a 90 percent graduation rate by the year 2026.

2. McKinney-Vento Education for Homeless Children and Youth Program (Title VII., Subtitle B, Pages 139 et seq.)

a. I.1 Student Identification, page 139.

We commend the State for requiring schools to use housing questionnaires at the beginning of the year and upon new enrollment to identify students experiencing homelessness. However, in our experience,

¹ *Graduation and Dropout Statistics Annual Report*, Office of Superintendent of Public Instruction, at p. 5, <http://www.k12.wa.us/LegisGov/2016documents/2014-15Graduation%20AndDropoutStatisticsAnnualReport.pdf> (March 2016).

some schools have taken months to process the information in these questionnaires. We therefore recommend that the State issue guidance addressing time deadlines for schools to process questionnaires in order to ensure that the questionnaires result in promptly identifying students experiencing homelessness. We also recommend that the State Plan create a definition of the responsibilities that a homeless liaison has to identify students experiencing homelessness. These responsibilities include outreach and coordinating with other entities and agencies and disseminating information to locations frequented by students experiencing homelessness and/or their families, such as schools, shelters, churches, public libraries, and soup kitchens. This information must be written and shared in an understandable manner.

Among the critical goals of outreach is connecting the youngest learners who are homeless and eligible for preschool, but are not yet enrolled. Head Start, Washington's Early Childhood Education and Assistance Program, early intervention services under Part C of the Individuals with Disabilities Education Act, and other preschool programs provide critical services. This goal should be explicitly stated in the State Plan.

In addition, we recommend that every school website describe McKinney-Vento rights, resources, and the contact information for the district's homeless liaisons.

The intake form can be a useful tool in identifying a student's needs. However, we recommend that the State Plan also ensure that homeless liaisons know how to properly refer students experiencing homelessness and their families to resources including, but not limited to, health care services, dental services, mental health and substance abuse services, and housing services, and what to do if these resources are not available in their community.

Finally, we recommend that the State Plan address how often a homeless liaison should assess and update students' needs because the needs of students experiencing homelessness can change on a daily basis.

b. Subsection ii, Partial Credit, page 142

As the State develops a plan regarding receipt of full or partial credit, we recommend that the information be included in the State Plan. Ability to receive credit in a more straightforward way could help reduce students' frustration about having to re-do work, and could increase graduation rates.

c. Subsection iii, Extracurricular Activities, page 143

As the State works with the Washington Interscholastic Athletic Association to ensure full athletic participation by students experiencing homelessness, we recommend that this information be included in the updated State Plan.