

**ELEMENTARY AND SECONDARY EDUCATION ACT (ESEA)
LOCAL EDUCATIONAL AGENCY (LEA)
PROGRAM NARRATIVE 2015-2016 YEAR**

TITLE I LEA PLAN FOR STUDENTS WHO ARE HOMELESS

-
- **ITEMS 1, 2 AND 3 MUST BE COMPLETED BY ALL LEAS THAT RECEIVE TITLE I FUNDS.**

***NOTE:** If the LEA has non-Title I schools, **a reserve must be included in the Title I FS-10 for services for students who are homeless.** Even if no children or unaccompanied youth are currently identified as homeless, a reserve should be included for children experiencing homelessness who may enroll during the school year.

1. If the LEA has non-Title I schools, it must include the amount of the set-aside in the narrative and how it was determined. For information about possible methods for determining the set-aside, see http://www.nysteachs.org/media/INF_Fed_TitleI_SetAside_QA.pdf. **Also with passage of the Consolidated Appropriations Act of 2014, Title I Part A and set-aside funds may now be used to cover the cost of the salary for the McKinney-Vento liaison even if that person has no Title I duties; and transporting students in temporary housing to and from their school of origin. Title I funds may not, however, be used to pay for transportation expenses that are reimbursed by the State. This Guidance is located at:** http://nysteachs.org/media/Title_I_ExpansionMVSet-AsideFunds6-30-2014.pdf

The LEA should also describe the services the LEA will provide children and unaccompanied youth who are homeless, including services provided with funds reserved under section 1113(c)(3)(A) of Title I. These services should include the mandated duties of the homeless liaisons, Section 722(g)(6)(A) of the McKinney Vento Act, available here:

http://nysteachs.org/media/INF_LP_Fed_MV.pdf. The funds reserved for children and unaccompanied youth who are homeless may be used to provide educationally related support services to children and unaccompanied youth in shelters and other locations where they may live.

West Buffalo Charter School provides homeless children and youth with access to the educational and other services that they need to enable them to meet the same challenging State student academic achievement standards to which all students are held. Homeless students are not separated from the mainstream school environment. The Homeless Student Liaison is responsible for ensuring that:

- Homeless children and youth are identified by school personnel and through coordination activities with other entities and agencies;
- Homeless students enroll in, and have full and equal opportunity to succeed in, the school;
- Homeless children and youth and their families receive educational services for which they are eligible, and referrals to health, mental health, dental, and other appropriate services;
- Parents or guardians of homeless children and youth are informed of educational and related opportunities available to their children, and are provided with meaningful opportunities to participate in the education of their children;

- Parents and guardians and unaccompanied youth are fully informed of all transportation services, including transportation to and from the school of origin, and are assisted in accessing transportation services;
- Enrollment disputes are mediated in accordance with the requirements of the McKinney-Vento Act; and
- Public notice of the educational rights of homeless students is disseminated to locations where they receive services under the McKinney-Vento Act.

The Homeless Student Liaison assists homeless children and youth with such activities as the following:

- Enrolling in school and accessing school services;
- Obtaining immunizations or medical records;
- Informing parents, school personnel, and others of the rights of homeless children and youth;
- Working with school staff to make sure that homeless children and youth are immediately enrolled in school pending resolution of disputes that might arise over school enrollment or placement;
- Helping to coordinate transportation services for homeless children and youth; and
- Collaborating and coordinating with State Coordinators for the Education of Homeless Children and Youth and community and school personnel responsible for providing education and related support services to homeless children and youth.

Services for homeless children and unaccompanied youth include the mandated duties of the homeless liaison; the School Nurse serves as the homeless liaison.

2. The LEA must include a copy of their enrollment form/residency questionnaire which must ask the living arrangements of the child or unaccompanied youth, including asking if they are living in motels, hotels, trailer parks or camping grounds due to the lack of alternative accommodations; with relatives or others due to loss of housing, economic hardship or a similar reason; shelters; cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations or similar settings; are abandoned in hospitals or are awaiting foster care placement; or have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings. This includes migratory children living in circumstances described above. A sample enrollment form may be found at the website: http://www.nysteachs.org/media/INF_SED_EnrollForm_ResQuest.doc. A copy of the LEA's enrollment form must also be kept on file.

A copy of the residency questionnaire is attached at the end of this module.

3. If an LEA states that there are no children or unaccompanied youth who are homeless the LEA must describe the efforts being made to identify children and unaccompanied youth experiencing homelessness, and must:

- Submit documentation of the LEA's efforts to identify children and unaccompanied youth who are homeless by contacting the local Department of Social Services (DSS) and Office of Children and Family Services (OCFS) Regional Offices to verify that there are no children or unaccompanied youth who are homeless in the LEA. Documentation of the LEA's efforts to identify children and unaccompanied youth who are homeless must be maintained on file and available for inspection upon request.

West Buffalo Charter School's Homeless Liaison works to identify homeless students, as required, including periodically contacting DSS and OCFS to verify that there are no homeless children or unaccompanied youth that attend the LEA. Those efforts are documented and kept on file. In addition, every adult in the school is charged with heeding changes in the living circumstances of the students and notifying the homeless liaison and other support staff in order to meet the needs of homeless students. A copy of the form that West Buffalo Charter School uses to document its efforts to identify homeless children and unaccompanied youth is on file.

The following sites provide contact information to help identify children and unaccompanied youth who are homeless.

- Contact information for local Departments of Social Services may be found at the website: www.health.state.ny.us/health_care/medicaid/ldss.htm
- Contact information for OCFS Regional Offices may be found at the website: www.ocfs.state.ny.us/main/regionaloffices_main.asp
- Contact information for local Youth Bureau Runaway & Homeless Services Coordinators for your county may be found at the website: <http://www.ocfs.state.ny.us/main/youth/rhydirectory.asp>

The LEA must answer Item # 11 of the Title I LEA Plan. Note: If a student with a disability transfers to the district where the family is temporarily residing, also known as the district of current location, the district of current location must, without delay, provide such student with a free appropriate public education, including services comparable to those described in the previously held IEP, in consultation with the parents, until such time as the district of current location adopts the current IEP or develops, adopts and implements a new IEP that is consistent with federal and State law and regulation. (8 NYCRR § 200.4[e][8]). Comparable services include any special transportation listed on the IEP.

If there are questions, contact Maxine Meadows-Shuford, Supervisor, Title I School and Community Services or Melanie Faby, Program Associate, at CONAPPTA@NYSED.GOV or (518) 473-0295.

**ELEMENTARY AND SECONDARY EDUCATION ACT (ESEA)
LOCAL EDUCATIONAL AGENCY (LEA) PROGRAM NARRATIVE 2015-2016 YEAR**

- The Consolidated Application requires **all Local Educational Agencies/Charter School LEAs (LEAs)** receiving federal funds under Elementary and Secondary Education Act (ESEA), Titles I, Part A and D, II, Part A, Title III, Part A and VI, Part B REAP (if applicable) **to provide a narrative plan** for approval by the State Education Department. The plan must demonstrate how funds are being used and coordinated to support improved teaching and learning to enable students to meet State student academic achievement standards.
- For the 2015-16 school year, **all LEAs must submit item # 11 - Coordination of Services and any other items with significant program changes following a review of the prior year's programs, 2014-15 Consolidated Application Update, student data, input from consultation meetings, and program evaluations.**
- **For new LEA applicants, including Charter School LEAs, all items** must be responded to in a complete narrative.

***NOTE:** If the LEA Plan is not satisfactory to the parents of participating children, the LEA must submit any parent comments with such plan when the LEA submits the plan to the State Education Department.

TITLE I – LEA PLAN AS REQUIRED BY ESEA

Provide a description of:

1. Any high-quality student academic assessments used by the LEA in addition to required State academic assessments that will be used to:
 - Determine the success of students participating in Title I programs in meeting State student academic achievement standards and to provide information to teachers, parents and students on the progress being made toward meeting those standards;
 - Assist in diagnosis, teaching and learning in the classroom in ways that best enable low-achieving children participating in Title I programs to meet State student academic achievement standards and do well in the local curricula;
 - Determine what revisions are needed to projects under Title I, Part A so that such students meet State student academic achievement standards; and
 - Effectively identify students who may be at risk for reading failure or who are having difficulty reading, through the use of screening, diagnostic, and classroom-based instructional reading assessments, as defined under section 1208.
2. Other indicators, if any, that will be used in addition to those described in section 1111 for the uses described in that section.
3. How teachers, in consultation with parents, administrators and pupil services personnel in Targeted Assistance Schools, will identify eligible children most in need of Title I, Part A services.
4. The programs to be conducted by the LEA's schools for both targeted assistance and schoolwide programs. Where appropriate, include a description of educational services outside such schools for children living in local institutions for neglected and delinquent children, and for neglected and delinquent children in community day programs.
5. How Targeted Assistance schools will address each of the required components of a Targeted Assistance School Program in section 1115(c).

6. How Schoolwide Program schools will address each of the required components of a Schoolwide Program contained in section 1114(b). The ESEA Flexibility waiver allows LEAs to implement a school wide program in any of its Priority and Focus schools, even if those schools do not have a poverty percentage of 40 percent or more.
7. Where appropriate, a description of how the LEA will use Title I, Part A funds to support after school (including before school and summer school) and school-year extension programs.
8. How the LEA will ensure that migratory children and formerly migratory children who are eligible to receive Title I, Part A services are selected to receive these services on the same basis as other children selected to receive Title I, Part A services.
9. The strategy the LEA will use to coordinate programs under Title I, Part A with Title II to provide professional development for teachers and principals and, if appropriate, pupil services personnel, administrators, parents and other staff, including LEA level staff in accordance with sections 1118 and 1119.^T
10. How the LEA will coordinate and integrate services provided under Title I, Part A with other education services at the LEA or individual school level, such as Early Reading First, Reading First, Head Start and Even Start. Also, include plans for the transition of participants in these programs to the elementary school program.

ALL LEAS ARE REQUIRED TO COMPLETE ITEM # 11

11. How the LEA will coordinate and integrate Title I, Part A services with other educational services at the LEA or individual school level, including services for children with limited English proficiency, children with disabilities, migratory children, neglected or delinquent youth, Indian youth served under Title VII, Part A, homeless children, and immigrant children, in order to insure program effectiveness, eliminate duplication and reduce fragmentation of the instructional program.

The ESL teacher will integrate Title I, Part A services with services for Limited English Proficient.

The Special Education Administrator will integrate Title I, Part A services with services provided by any consultant teacher, speech teacher, occupational or physical therapists, and any other specialized services provided by the Buffalo City School District Committee on Special Education.

WBCS does not presently have any students in the following categories:

- Migratory Children
- Neglected or Delinquent Youth
- Indian Youth

The School Nurse is the designated homeless liaison and—working with administrators and area service agencies—coordinates services for children identified as homeless on an as-needed basis. The school had four homeless students in the 2013-14 SY.

If a student with a disability transfers to the district where the family is temporarily residing and enrolls at West Buffalo Charter School, the school will, without delay, provide the student with a free appropriate public education, including services comparable to those described in the previously held

^T Please refer to <http://www.p12.nysed.gov/accountability/archives/03-2008.html> for the most recent FACT SHEET ON THE ESEA REQUIREMENTS FOR TEACHERS AND PARAPROFESSIONALS

IEP, in consultation with the parents, until such time as the district of current location adopts the current IEP or develops, adopts and implements a new IEP that is consistent with federal and State law and regulation. (8 NYCRR § 200.4[e][8]). Comparable services include any special transportation listed on the IEP.

A copy of the school's transportation and enrollment policy is attached at the end of this module.

12. The poverty criteria that will be used to select school attendance areas for Title I, Part A programs.
13. The strategies/programs the LEA and schools use to implement effective parental involvement in programs assisted under Title I, Part A, as required in section 1118. Section 1118(a)(3)(A) requires an LEA to reserve not less than one percent of its Title I, Part A allocation to carry out parental involvement programs, activities and procedures, except that this requirement does not apply if one percent of such allocation is \$5,000 or less. Section 1118(a)(3)(B) requires LEAs to involve parents in the decisions regarding how funds reserved under Section 1118(a)(3)(A) are allotted for parental involvement activities. If one percent of the LEA's Title I, Part A allocation is more than \$5,000, describe how the LEA has involved parents in the decisions regarding how funds reserved under Section 1118(a)(3)(A) are allotted for parental involvement activities.
14. How the LEA will provide additional educational assistance to individual students assessed as needing help in meeting the State's student academic achievement standards.
15. Where appropriate, how the LEA will use Title I, Part A funds to support preschool programs for children, particularly children participating in Early Reading First, Head Start or Even Start, as set forth in section 1112(b)(1)(K).
16. The actions the LEA will take to publicize and disseminate the results of the local annual review in accordance with the requirements of section 1116(a)(1)(C).

TITLE I, PARENTAL NOTIFICATION REQUIREMENTS

- **All notification letters must be in an understandable and uniform format** and, to the extent practicable, in a language that the parent(s) can understand.

NOTE: Only LEAs that provide a limited English proficiency (LEP) program funded wholly or in part with Title I funds **are required to complete items 1 through 4.**

1. Provide a description of the procedures that the LEA will implement to ensure the timely notification, not later than 30 days after the beginning of the school year, to parents of LEP students identified for participation or who are participating in a Title I funded program. The notification letter must include:
 - A. the reason for the child's identification as limited English proficient and in need of placement in a language instruction educational program;
 - B. the child's level of English language proficiency and how it was assessed;
 - C. the status of the child's academic achievements;
 - D. the methods of instruction used in the program and other available programs, including how such programs differ in content, instructional goals, and in use of English and a native language in instruction;
 - E. how the program will meet the educational strengths and needs of the participating student;
 - F. how the program will specifically help their child learn English and meet age-appropriate academic standards for grade promotion and graduation;
 - G. the specific exit requirements for the program, including the expected rate of transition from the Title I funded program into classrooms that are not tailored for LEP students and the expected rate of graduation from secondary school (if funds are used to support secondary school programs);
 - H. in the case of a child with a disability, how the Title I program meets the objectives of the child's individualized education program;
 - I. information pertaining to parental rights that include the following written guidance:
 - detailing parents' right to have a child immediately removed from the program upon request;
 - detailing the options that parents have to decline to enroll their child in such program, or choose another program or method of instruction, if available; and
 - detailing the assistance the LEA will provide to parents in selecting among various programs and methods of instruction, if more than one program or method is offered by the eligible entity.
2. Provide a description of how the LEA will notify parents within the first two weeks of their child being placed in a language instruction educational program, if the child has not been identified as a LEP student prior to the beginning of the school year.
3. Provide a description of how the LEA will implement an effective means of outreach to parents of LEP students to inform them of how they can be involved in the education of their children.
4. Provide a description of the notification process the LEA will implement to inform parents of students participating in a Title I funded language instruction educational program that the program failed to make progress on the annual measurable achievement objective. Notification must be provided no later than 30 days after the failure occurred. Submit a sample copy of the notification letter.

TITLE I, QUALIFICATIONS FOR TEACHERS AND PARAPROFESSIONALS/ PROFESSIONAL DEVELOPMENT

- **All LEAs: Only submit this page if significant changes in program(s) have occurred.**
- A response is required for each narrative item.
- Reference should be made to the most recent “Fact Sheet on ESEA Requirements for Teachers and Paraprofessionals” at <http://www.p12.nysed.gov/accountability/archives/03-2008.html>. This Fact Sheet represents our current understanding of such requirements, but may change as additional guidance is received from the United States Department of Education.

***NOTE:** All teachers whose positions are proposed to be paid by Title I funds must be highly qualified for any core subjects to which they are assigned. **For the purposes of NYSED’s Academic Intervention Services (AIS) regulation regarding supplemental services, which are not considered a core subject, such teachers must have NYS certification in the subject area(s) of AIS assignment**

Provide a description of the actions that the LEA will take to ensure that:

1. Any teachers whose positions are proposed to be paid by Title I funds are highly qualified to teach each core academic subject to which they are assigned; or in the case of AIS teacher positions to be supported by Title I funds for the provision of supplemental services, such teachers have NYS certification in the subject area(s) of AIS assignment.
2. All other teachers of core academic subjects are highly qualified or are making progress towards becoming highly qualified.
3. All paraprofessionals working in a program supported with Title I funds or a school wide program and providing instructional support have met the qualification requirements.
4. All paraprofessionals working in a program supported with Title I funds or a school wide program have earned a high school diploma or its recognized equivalent, regardless of whether the paraprofessional is providing instructional support.
5. The process the LEA will implement to verify compliance with the requirements of section 1119 for teacher and paraprofessional qualifications and the duties of paraprofessionals is in place. Principals of Title I schools must attest in writing annually as to whether the school is in compliance. Submit a sample of the Principal’s Attestation Form.

**TITLE I, PARENTS' RIGHT-TO-KNOW AS REQUIRED BY
ELEMENTARY AND SECONDARY EDUCATION ACT (ESEA)**

- **All LEAs - Only submit this page if significant changes in program(s) have occurred.**
-

Provide a description of:

1. The LEA procedures (at the beginning of each school year) to notify parents of each student attending a Title I school that they may request information regarding the professional qualifications of their child's **classroom teacher(s) and paraprofessional staff**. The notice and information provided to parents must be in an understandable and uniform format and, to the extent practicable, provided in a language or other mode of communication that the parents can understand. Submit a sample copy of the notification letter which must advise the parents that they are entitled, at a minimum, to the following:
 - A. whether the teacher has met State certification criteria for the grade levels and subject areas in which the teacher provides instruction;
 - B. whether the teacher is teaching under emergency or other provisional status through which State certification criteria have been waived;
 - C. the baccalaureate degree major of the teacher and any other graduate certification or degree held by the teacher, and the field of discipline of the certification or degree; and
 - D. whether the child is provided services by paraprofessionals and, if so, their qualifications.The notification must tell parents how they can obtain the information to which they are entitled.
2. The LEA procedures to ensure that Title I schools provide:
 - A. To each parent information on their child's level of achievement in each of the State academic assessments; and
 - B. Timely notification sent to the parent if their child has been assigned, or has been taught for four or more consecutive weeks, by a teacher who is not highly qualified. **A sample copy of this letter is required.**

NOTE TO SCHOOLS/LEAS: Please assist students and families filling out this form. Do not simply include this form in the registration packet, because if the student qualifies as residing in temporary housing, the student is not required to submit proof of residency and other required documents that may be part of the registration packet.

ENROLLMENT FORM - RESIDENCY QUESTIONNAIRE

Name of LEA: West Buffalo Charter School

Name of School: West Buffalo Charter School

Name of Student: _____
Last First Middle

Gender: Male Female Date of Birth: ____/____/____ Grade: ____ ID#: _____
Month Day Year (preschool-12) (optional)

Address: _____ Phone: _____

The answer you give below will help the district determine what services you or your child may be able to receive under the McKinney-Vento Act. Students who are protected under the McKinney-Vento Act are entitled to immediate enrollment in school even if they don't have the documents normally needed, such as proof of residency, school records, immunization records, or birth certificate. Students who are protected under the McKinney-Vento Act may also be entitled to free transportation and other services.

Where is the student currently living? (Please check one box.)

- In a shelter
- With another family or other person because of loss of housing or as a result of economic hardship (sometimes referred to as "doubled-up")
- In a hotel/motel
- In a car, park, bus, train, or campsite
- Other temporary living situation (Please describe): _____

- In permanent housing

Print name of Parent, Guardian, or Student (for unaccompanied homeless youth)

Signature of Parent, Guardian, or Student (for unaccompanied homeless youth)

Date

If the student is NOT living in permanent housing, proof of residency and other documents normally needed for enrollment are not required and the student is to be immediately enrolled. After the student has been enrolled, the district/school must contact the previous district/school attended to request the student's educational records, including immunization records, and the enrolling district's LEA liaison must help the student get any other necessary documents or immunizations.

West Buffalo Charter School Transportation and Enrollment of Homeless Students

Charter schools are considered local educational agencies (LEAs) under the McKinney-Vento Act and are required to appoint a liaison to help students in temporary housing and their parents. Under the Act, the liaison is responsible for ensuring that:

- Children and youth in temporary housing are identified by school personnel and through coordination activities with other agencies;
- Children and youth in temporary housing enroll in, and have a full and equal opportunity to succeed in, schools of that LEA;
- Families, children and youth in temporary housing receive educational service for which such families and youth are eligible;
- The parents/guardians of children and youth in temporary housing are informed of the educational and related opportunities available to their children and are provided with meaningful opportunities to participate in their children's education;
- Public notice of the educational rights of children and youth in temporary housing is disseminated where such children and youth receive services, such as schools, family shelters, and soup kitchens;
- Enrollment disputes are promptly mediated; and
- The parent or guardian of a child or youth in temporary housing, and any unaccompanied youth, is fully informed of all transportation services, including transportation to the school of origin. (*42 U.S.C. § 11432(g)(6)(A)*).

Pursuant to state law, all students identified as homeless, including those attending charter schools, must complete a designation form, indicating the designated school district of attendance. (*Education Law § 3209(2)(d)*).

The parent or the student with the help of the McKinney-Vento Liaison, in the case of an unaccompanied homeless youth, designates the district of attendance on the designation form, otherwise known as the STAC-202 form, linked here:

http://www.oms.nysed.gov/stac/schoolage/schoolage_placement_summary/homeless/stac_202_form.pdf

After a student has been identified as homeless, a designation form or STAC-202 form must be completed.

All local education agencies (charter schools, school districts, and BOCES) have an affirmative obligation to identify students experiencing homelessness. (*42 U.S.C. § 11432(g)(6)(A)(i); Education Law § 3209(2-a)*). To help LEA's meet this requirement, LEAs receiving Title I funds are required to administer a **Residency Questionnaire** inquiring about the housing status of all students seeking enrollment in the district *as well as those who have a change of address* per SED's Consolidated Application.

A charter school, school district, or local department of social services (in cases where it has placed the family in temporary housing) may complete the STAC-202 form and send a copy to all parties listed on the STAC-202 form. In many instances, the charter school will be the first to become aware of a student's housing situation and should fill out the STAC-202 form. However, the charter school itself should *not* be entered anywhere on the STAC-202 form. It should be completed as follows:

- *Box 7A. NYS School District of Attendance Before Becoming Homeless:* the student’s district of origin should be entered, even if the student has never attended a traditional public school in that district.
- *Box 8A. NYS School District of Current Location:* the school district in which the student is temporarily residing should be listed. Note that, because students may attend charter schools in any district, the student’s school district of current location may or may *not be* the district in which the charter school they are attending is located.
- *Box 9A. NYS Designated District of Attendance:* the district designated by the student’s parent (or the youth, if she is unaccompanied) should be listed

A parent may designate either the district of origin or the district of current location as the district of attendance.

- In most cases, if the student was attending the charter school prior to becoming homeless, the district of origin should be designated as the district of attendance, to ensure the provision of transportation. Under Education Law, the district of origin must transport a student in temporary housing up to 50 miles each way to school, whereas the student is only eligible for transportation from the district of current location insofar as permanently housed students in that district are eligible for transportation to that charter school. (*Education Law § 3209(4)*).
- If the student enrolls in a charter school after becoming homeless, the designation of the district of attendance will depend on factors such as where the student temporarily living, which district is better suited to provide the transportation, and which district is better suited to provide special education services if the student has an IEP (for example, which district may already have arrangements in place to provide speech therapy in the charter school in cases where the student in temporary housing is mandated to receive this related service according to his IEP).

Typically, the school district of residence is responsible for charter school basic tuition payments to charter schools. (*Education Law § 2856(1)(a)*). However, students experiencing homelessness do not have a district of residence because of their loss of permanent housing. The **designated district of attendance is responsible for paying the charter school basic tuition for a student in temporary housing who is attending a charter school.**

The **designated district of attendance is responsible for transporting students in temporary housing who attend a charter school.** If the district of origin is designated, it is required to provide transportation up to 50 miles each way. If the district of current location is designated, it is required to provide transportation subject to the mileage limitations applicable to permanently housed students in the district. (*Education Law § 3209(4)*).

If the district of current location is designated as the district of attendance, it will be reimbursed the non-resident district tuition rate, pro-rated for the period of instruction while the student is in temporary housing. The reimbursement is processed through the STAC Unit and is initiated with the sending of the STAC 202 form to the State Education Department. If the district of origin is designated, there is no reimbursement available through the STAC process, and the STAC 202 form should not be sent to the State Education Department, although the form should be completed and retained by the charter school.

Districts are eligible for state transportation aid for allowable costs associated with transporting students in temporary housing. Districts will be reimbursed using the same transportation aid ratios as those used for permanently housed students. (*Education Law § 3209(4)*).

Attachments: STAC 202
Residency Questionnaire
Documenting Efforts to Identify Homeless Students