Guidance for Coding Montana Children as Homeless

When determining a family's housing status it is important to treat the subject of homelessness with compassion and sensitivity. Many families do not consider their situation to be one of homelessness. They may become offended, or may even be fearful of what will happen to their children if they are reported as homeless. Liaisons, school secretaries, counselors and other district personnel should consider using terms such as "in transition" or "between living situations" to describe families experiencing homelessness. District staff should also assure parents that these are standard housing questions asked of all families, and the answers determine whether a child is eligible for additional services. District staff are required to ask these questions to identify potentially homeless students in order to provide the best possible education to every child, and to connect the family to other support services available in the community. Staff should help families understand that they are not being offered a “hand-out,” you are providing their children are being provided with a "hand-up." Effective McKinney-Vento programs are one way that communities band together to help their children.

The following steps will assist district data specialists in recording the status of homeless students in order to meet state and federal reporting requirements.

**Step 1:** Once the District Homeless Liaison has identified a child as homeless, he/she should formally notify the enrollment/data clerk in writing to code the child in the district’s student information system (SIS). The Liaison must also include the nighttime residence of the child at this time and include information if the child is unaccompanied.

**Selecting the nighttime residence.** There are four choices when selecting the nighttime residence of homeless children and youth. It is not necessary to change the nighttime residence information after the child has been identified, even if their living situation changes.

1. **Sheltered (code 01):** Families who are living in shelters or transitional housing are considered homeless. Any type of emergency shelter qualifies a family as homeless. Shelters include those run by faith-based organizations (such as Family Promise), domestic violence shelters, warming centers, or other emergency housing. Transitional housing, including housing for veterans, former inmates, drug or alcohol rehabilitation, programs for people experiencing physical or mental health issues, and any other type of short term/temporary housing situation may qualify a family or youth as homeless. Transitional supportive housing for pregnant or parenting teens or for victims of domestic violence may also qualify a family or youth as homeless.

2. **Doubled up (code 02):** This designation should be used for any family or unaccompanied youth who is sharing the home of another person. The family or youth must be living with the host family due to financial hardship. A family who chooses to share the housing of another based on cultural, religious, or personal preference should not be considered homeless. It is important for a liaison to question a family in a gentle and respectful manner regarding their housing choice. Never assume that a family is not homeless based on their ethnicity, nationality, or religious beliefs.
preference. A family may have experienced eviction, loss of housing due to fire, natural disaster, divorce, domestic violence, or other situation as determined by the Homeless Liaison. Unaccompanied youth who are “couch surfing” should also be listed as “doubled up.”

3. Unsheltered (code 03): This living situation applies to a family who is sleeping in a vehicle, in any type of building not meant for human habitation, or who is camping out. A family who is living in any type of housing that would be considered inadequate (no electricity/running water) would fall into this category. Housing which has been condemned or is otherwise not fit to live in would also qualify a family as unsheltered. A family who is living in a tent or RV which is located in a campground or on private land, including being parked in a driveway or storage facility, may be considered unsheltered. In the case of a family who may be living in an RV due to lack of available housing in the community (i.e., Bakken oil field area) the local liaison should visit the family to determine if the housing is adequate to provide for the basic educational and developmental needs of the child. Liaisons are encouraged to consult with the State Coordinator in difficult to determine cases.

4. Hotels/motels (code 04): A family who is living in a hotel or motel because they cannot afford housing should be considered homeless. A family who has lost housing due to fire or other natural disaster should also be considered homeless if they are living in a hotel or motel. In cases where a family is living in a hotel or motel due to lack of adequate housing in the community (i.e., the Bakken oil field area) the Homeless Liaison should investigate to determine if the family is choosing to live in the hotel, or if there is a lack of adequate housing available. In this case the liaison must determine if the housing is adequate to provide for the basic educational and developmental needs of the child. Liaisons are encouraged to consult with the State Coordinator in difficult to determine cases.

- **Note:** The district homeless liaison must designate a nighttime residence for all children. A designation of “unknown” or “other” is not acceptable.

**McKinney-Vento:** The McKinney-Vento box should only be checked if your district receives a Title X subgrant from the OPI. Please consult with your Federal Programs Director/Coordinator to determine whether or not this box should be checked.

**Unaccompanied Youth:** The Unaccompanied Youth box should be selected for any homeless child who is not in the physical custody of a legal parent or guardian. Unaccompanied children may be any age. Children who are incarcerated or are under the control of the Juvenile Justice system are not homeless. Children who have been placed in group homes or in kinship care or other homes providing care to children through the foster care system are not homeless. Children who have been placed in the care of someone other than a parent through the use of a legal document granting permanent or temporary custody are not homeless. However, children who are “awaiting foster care placement” may be considered homeless if they have been placed in an emergency or short-term placement while they await a placement decision from the court or Child Protective Services. Liaisons are encouraged to consult with the State Coordinator in difficult to determine cases.
Children who are in the care of family or friends due to loss of housing, including incarceration of the parent, may be considered homeless. However, informal custody arrangements, for the purpose of allowing a child to complete school in their district of origin, are usually not considered a homeless situation. The liaison should investigate the individual circumstances of the family.

Runaway or throwaway youth should be considered homeless. Consult with your local school district regarding mandatory reporting of youth in these situations. Liaisons should consider consulting with local law enforcement or the Missing and Exploited Children’s Hotline to determine if a child is in danger. Any student who reports that they left home due to any type of abuse should also be reported to Child Protective Services. However, district liaisons do not have to determine why a child is not at home. Nighttime residence determines the student's qualification as homeless, not the reason they left home, or their ability to return home. Parents who object to a child being classified as homeless should be referred to the McKinney-Vento Act or to the Runaway and Homeless Youth Act. The obligation of the district is to educate and provide federally required services, not to make determinations regarding the feasibility of a student's living situation. In the case of runaway/throwaway youth it is also important to remember that district personnel are rarely aware of the level of function or dysfunction of a student's family. It is important to be open-minded and non-judgmental when dealing with a student and their family in this situation.

**Unaccompanied youth who are 18 or older.** The local liaison should investigate cases on an individual basis to determine if a student is homeless. Students who are employed and living in an apartment with a signed lease should not be considered homeless. Liaisons are encouraged to maintain information on these students for the purpose of assisting them with applying for financial aid based on their status as "independent students." If the student's nighttime residence fits any of the previously mentioned categories, record them as homeless and unaccompanied. A student who is living with others or renting a room without a formal, legal lease agreement may be considered homeless. The local liaison should work with this student to determine their living situation. Liaisons are encouraged to consult with the State Coordinator in difficult to determine situations.

**Step 2:** Enter the information in the AIM system. Districts may enter the data in AIM via direct entry or through file uploads. At the minimum, the state requires homeless data to be reported in October and March. District clerks may enter data on a more frequent schedule that meets their needs. The image below shows the homeless data fields on the enrollment tab in AIM.
It is important to note that once a child has been coded as homeless that designation is maintained for the remainder of the school year. Do not change a child’s designation as homeless, even if permanent housing is obtained, until the beginning of the next school year. Liaisons should contact all families/students at the beginning of the new school year to determine if they are still living in a homeless situation. Note that it is possible for a family/student to remain homeless for more than one school year if their financial situation has not improved.

Resources

OPI Homeless Program Coordinator: Heather Denny, (406) 444-2036, hdenny@mt.gov

AIM Helpdesk: 406-444-3800, opiaimhelp@mt.gov