



GARDEN GROVE UNIFIED SCHOOL DISTRICT

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The Honorable Maria D. Hernandez
Presiding Judge
Orange County Superior Court
700 Civic Center Drive West
Santa Ana, CA 92701

RECEIVED

AUG 30 2023

Re: Garden Grove Unified School District's Response to the 2022-23 Orange County Grand Jury Report on *The ABC's of Educating Children Experiencing Homelessness in Orange County*

To the Honorable Maria D. Hernandez:

The Garden Grove Unified School District (District) commends the Grand Jury for its time and attention devoted to studying this very important issue and publishing the Grand Jury Report dated May 25, 2023 entitled: *The ABCs of Educating Children Experiencing Homelessness in Orange County* (Report). The District is committed to serving all students and recognizes that there are unique challenges facing children and families experiencing homelessness as well as challenges for our District and our school personnel devoted to identifying and serving these students and families.

The District has thoroughly reviewed and considered the Findings and Recommendations in the Report. In accordance with California Penal Code sections 933 and 933.05, the Grand Jury has requested that the District respond to the Findings and Recommendations made in the Report. The District responds to the Grand Jury's Findings and Recommendations with the following:

Finding: F1

"Many children experiencing homelessness are not identified as such, and therefore do not receive the support and benefits authorized by the McKinney-Vento Act."

Finding Response: **Respondent agrees with the finding.**

Finding: F2

"The lack of mandatory McKinney-Vento Act training of school site office staff, counselors, and teachers contributes to a failure to identify children experiencing homelessness."

Finding Response: **Respondent disagrees wholly or partially with the finding.**

Explanation: GGUSD has implemented consistent McKinney-Vento Act training for all of our administrators, office staff, counselors, community liaisons, and social workers. We have developed training videos for all these work groups, including teachers.

Finding: F3

“There is disparity in the application of McKinney-Vento regulations across Orange County public school districts which results in unequal access to educational benefits for children experiencing homelessness.”

Finding Response: **Respondent disagrees wholly or partially with the finding**

Explanation: Since we have not interviewed all Districts about this point, we are not able to make a definitive statement about the veracity of this statement. Presumably, there are components of McKinney-Vento legislation that are followed by all school districts, although it may be to varying degrees of completeness.

Finding: F4

“The majority of McKinney-Vento Liaisons are in full-time positions, but because their work includes multiple non-McKinney-Vento responsibilities, most do not have sufficient time to do the work required by the McKinney-Vento Act.”

Finding Response: **Respondent agrees with the finding**

Finding: F5

“Many McKinney-Vento Liaisons lack needed experience due to a high turnover rate in those positions.”

Finding Response: **Respondent disagrees wholly or partially with the finding**

Explanation: It is possible that McKinney-Vento Liaisons hold their positions for a relatively short period of time. It is unclear how “a short period of time” is being defined.

Finding: F6

“McKinney-Vento Act training is not mandatory for the majority of McKinney-Vento Liaisons.”

Finding Response: **Respondent disagrees wholly or partially with the finding.**

Explanation: It is required that McKinney-Vento Liaisons be trained in the McKinney-Vento legislation, including all of the rights and protections that are afforded to homeless students and families.

Finding: F7

“Students experiencing homelessness who are enrolled in an elementary district often do not continue to receive McKinney-Vento benefits when they move to a high school district because the Federal

Educational Rights and Privacy Act (FERPA) prevents the sharing of this information between districts.”

Finding Response: **Respondent agrees with the finding**

Finding: F8

“McKinney-Vento funds depend on school districts submitting grant proposals, but not all districts have employees trained in writing grant applications, resulting in missed funding opportunities.”

Finding Response: **Respondent agrees with the finding**

Finding: F9

“School districts that do not apply for grants which fund programs benefitting children experiencing homelessness miss potential revenue opportunities.”

Finding Response: **Respondent agrees with the finding**

Finding: F10

“McKinney-Vento is an unfunded federally mandated program; however, school districts which qualify and apply for Title I, Part A funds may obtain revenues that can be used for children experiencing homelessness. These funds are insufficient to meet the needs of the school districts supporting children experiencing homelessness.”

Finding Response: **Respondent disagrees wholly or partially with the finding**

Explanation: While it is true that McKinney-Vento requirements are an unfunded mandate from federal legislation, the funds that are set aside from Title I, Part A do support our homeless students in many ways. However, the limitations placed on these funds on the specific items/resources that can be purchased can limit the types of support offered to families. There can be a disconnect between what is allowed by Title 1, Part A, and the family's needs.

Finding: F11

“A lack of reliable transportation for children experiencing homelessness often results in chronic tardiness and absenteeism.”

Finding Response: **Respondent agrees with the finding**

Finding: F12

“Chronic Absenteeism Rates of Homeless Students are disproportionately high in comparison with the Chronic Absenteeism Rates of All Students and Sociodisadvantaged Students.”

Finding Response: **Respondent agrees with the finding**

Finding: F13

“Children experiencing homelessness in Orange County perform at a lower level on standardized tests and have a lower graduation rate than All Students and Socioeconomically Disadvantaged Students.”

Finding Response: **Respondent agrees with the finding**

Finding: F14

“The percent of Homeless Students graduating who failed to meet state standards on English Language Arts and Math tests is significantly higher than it is for All Students and Socioeconomically Disadvantaged Students.”

Finding Response: **Respondent agrees with the finding**

Finding: F15

“There is a tendency by school districts to operate in isolation, which prevents productive collaboration on addressing the issue of children experiencing homelessness and the challenges of their education.”

Finding Response: **Respondent agrees with the finding**

Finding: F16

“A significant lack of affordable permanent housing contributes to many families being caught in the cycle of homelessness.”

Finding Response: **Respondent agrees with the finding**

Recommendation 1: (Findings Addressed: F1, F2, F3)

“All Orange County school districts should develop a "Back to School" plan which includes mandatory McKinney-Vento Act training for all district and school administrators, teachers, office staff, and counselors by December 31, 2023, and annually thereafter.”

Recommendation Response: **Recommendation has been implemented**

Summary: GGUSD has a "Back to School" plan that has as one of its primary actions, the annual training of all administrators, secretaries, community liaisons, counselors, social workers, nurses, psychologists. Presenting the training video to teachers is the next phase of the plan that requires further analysis.

Recommendation 2: (Findings Addressed: F1, F3, F5, F6)

“Participation in Orange County Department of Education (OCDE) McKinney-Vento Act training programs for all Local Education Agencies (LEA) McKinney-Vento Liaisons should be mandated by October 1, 2023, and annually thereafter.”

Recommendation Response: **Recommendation has been implemented**

Summary: GGUSD Homeless Liaison participates in all OCDE Quarterly Network meetings. These trainings typically include review of new or upcoming legislation from Sacramento, highlights from a community partner and supports that they give homeless students, as well as opportunities to network with neighboring district homeless liaisons.

Recommendation 3: (Findings Addressed: F4)

“Given that most LEA McKinney-Vento Liaisons are responsible for a number of other duties, and do not have sufficient time to do their McKinney-Vento required work, school districts should identify ways to increase support and/or staff to address the numerous tasks of the Liaisons by October 1, 2023.”

Recommendation Response: **Recommendation requires further analysis**

Summary: GGUSD has invested in several additional staff who will support many student groups, including our homeless youth. These staff members include School Social Workers, Mental Health Specialists, School Counselors, and extending the hours for our Community Liaisons. After analyzing the benefits of the increased staffing, GGUSD will study the feasibility of increasing the time allotted for the designated McKinney-Vento Liaison to improve student and family services. GGUSD’s five Family Resource Centers also support our McKinney Vento students and families with various supports and resources in health care, homeless education assistance, immigration, legal advocacy, and mental health counseling. The Family Resources Centers are staffed by district community liaisons (DCL) trained to serve the district’s diverse student population and have access to community agency contact information, which has also been shared with School Community Liaisons in their collaborative work.

Recommendation 4: (Findings Addressed: F7)

“By January 1, 2024, for children experiencing homelessness to receive uninterrupted McKinney-Vento benefits, Orange County school districts should add a section to their mandatory enrollment school form enabling parents/guardians to permit their school to share information regarding their child's McKinney-Vento status with other districts that their child may be attending.”

Recommendation Response: **Recommendation requires further analysis**

Summary: GGUSD will need to look at the logistics for adding this information to the current pre-enrollment and data confirmation process. It would be important to consider situations where families move from one school district to another; however, the move would be into a fixed, regular, and permanent residence and so therefore, may no longer be eligible for McKinney-Vento services.

Recommendation 5: (Findings Addressed: F8, F9, F10)

“By October 1, 2023, each Orange County school district should develop and maintain a centralized list of district employees with grant application writing capability so that they are prepared to apply for available grants to assist in educating children experiencing homelessness.”

Recommendation Response: **Recommendation has not been implemented but will be with a time frame for implementation.**

Summary: GGUSD currently has a number of staff members who have successfully written grant proposals that have been awarded for a wide range of student groups. **By February 2024, GGUSD will consider the creation of a centralized list of these individuals who can support the writing of grant proposals that are focused specifically on supporting homeless students and their families.**

Recommendation 6: (Findings Addressed: F11, F12, F13 F14, F15)

“By October 1, 2023, a joint task force should be formed by the OCDE comprised of a district-level administrator from each Orange County school district and leadership from non-profit organizations who serve homeless families to address absenteeism, low test scores, and low graduation rates of children experiencing homelessness.”

Recommendation Response: **Recommendation requires further analysis**

Summary: GGUSD would be eager to serve our homeless students and families by participating in a joint task force of other school districts and OCDE along with non-profit organizations to look at ways to support homeless students' challenges by addressing absenteeism, improving academic outcomes and graduation rates for our homeless youth. This will require partnerships across districts in Orange County working together to envision how this task force will be convened, our mission and purpose, and the goals and strategies needed to achieve those aims.

Recommendation 8: (Findings Addressed: F11, F12)

“By May 1, 2024, each Orange County school district administration should develop and present to the District Board of Education a plan to lower the Absenteeism Rates of homeless students.”

Recommendation Response: **Recommendation has not been implemented but will be with a time frame for implementation.**

Summary: GGUSD is working to improve the attendance of all students who are struggling with chronic absenteeism. Students identified within the McKinney-Vento program are among the students who require additional support. GGUSD has begun a collaboration with an outside company who will be supporting us in that work. School Innovations and Achievement (SIA) has a program: Attendance to Achievement that pulls attendance data from our Student Information System (SIS) and presents that data in a usable and concise manner. School site teams, including administrators, attendance clerks, and others, will then be able to look at the attendance trends of all students and connect them to needed resources. Additionally, GGUSD has invested in hiring staff who will be focusing on supporting students with Tier-2 level supports regarding attendance improvement. The staff include a School Social Worker and four Mental Health Specialists who will be assigned to the five Trustee areas throughout the district. These staff members will support students, including those identified as homeless youth, with attendance. These new supports and systems will be in place for the start of the 2023-2024 school year.

Recommendation 9: (Findings Addressed: F13, F14)

“By May 1, 2024, each Orange County school district administration should develop and present to the District Board of Education a plan to improve the performance of homeless students in English, Language Arts, and Math.”

Recommendation Response: Recommendation requires further analysis

Summary: GGUSD believes that all students are capable of achieving their best when good first instruction is paired with grit and determination from each student. To support improving the academic skills of our students within the McKinney-Vento program, GGUSD will continue to develop, fine-tune, and optimize the Multi-Tiered Systems of Support (MTSS) to identify areas of academic lag and to provide specific evidence-based interventions in those areas. GGUSD has re-vamped the SST process, and has developed a manual for schools to utilize. The manual describes the cycle of inquiry as: "Plan, Do, Study, Act". Each of these phases has specific activities that SST teams will engage in to help in developing robust academic interventions that will meet the needs of McKenney-Vento Youth who are struggling to make appropriate academic gains. GGUSD is currently working to expand the systems and protocols that schools use in their Student Success Team (SST) meetings and intervention cycles. GGUSD will pilot a new software program (Beyond SST) developed by the same company that provides our SEIS software in several schools (elementary, intermediate, and high school levels). This software will utilize formative academic data to help track the effectiveness of interventions given to students who are struggling with making appropriate academic gains, recommend intervention strategies, and track their effectiveness.

Please accept the information provided herein as the District's responses to the Orange County Grand Jury's Factual Findings and Recommendation in the Report. Once again, we appreciate the time and attention the Grand Jury devoted to this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Mafi', with a stylized flourish at the end.

Gabriela Mafi, Ed.D.