

August 23, 2023

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

Re: Brea Olinda 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 Brea Olinda Unified School 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 ABC's 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 and 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 Findings and Recommendations made in the Report. The District responds to the Grand Jury's Findings and Recommendations with the following:

Finding 1

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

The District wholly disagrees with the finding.

The District cannot verify that "many" children in Orange County experiencing homelessness are not identified as such and therefore do not receive McKinney-Vento services. As it relates to children experiencing homelessness in our District, the District wholly disagrees with this finding as the scope of this under-identification is hard to quantify

Finding 2

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.

The District agrees with this finding.

Finding 3

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.

The District agrees with this finding. Funding disparities between districts based on the state's funding formula contributes to unequal access.

Finding 4

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.

The District agrees with this finding.

Finding 5

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

The District wholly disagrees with the finding.

The District does not have firsthand information regarding the experience and turnover rate for McKinney-Vento Liaisons throughout the county and, therefore, cannot take an authoritative position on this statement.

Finding 6

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

The District agrees with this finding.

Finding 7

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.

The District wholly disagrees with the finding.

Because the District is a unified school district serving grades TK-12, the District does not have firsthand information regarding this finding and, therefore, cannot agree with this finding.

Finding 8

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.

The District agrees with this finding.

Finding 9

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

The District agrees with this finding.

Finding 10

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.

The District agrees with this finding. The demands on Title I funds far exceed the needs of schools that receive them.

Finding 11

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

The District agrees with this finding.

Finding 12

Chronic Absenteeism Rates of Homeless Students are disproportionately high in comparison with the Chronic Absenteeism Rates of All Students and Socioeconomically Disadvantaged Students.

The District agrees with this finding.

Finding 13

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.

The District agrees with this finding.

Finding 14

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.

The District agrees with this finding.

Finding 15

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.

The District partially disagrees with the finding.

As it relates to our interaction with other school districts, the District partially disagrees with this finding because there are county collaboration meetings (and these are helpful) but coordination between districts (especially smaller ones) would be beneficial if resources could be pooled and shared for greater efficiency.

Finding 16

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

The District agrees with this finding.

Recommendation 1

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. (F1, F2, F3)

The recommendation has not yet been implemented, but will be implemented in the future.

The District has not yet implemented this recommendation but will implement this recommendation by offering the training to school administrators, teachers, office staff and counselors prior to December 31, 2023.

Recommendation 2

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. (F1, F3, F5, F6)

The recommendation has been implemented.

Recommendation 3

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. (F4)

The recommendation requires further analysis.

Example: The District determined that this recommendation requires further analysis. Resource limitations of a district the size of BOUSD make this recommendation a challenge. The district will review its current personnel and resource allocations in the fall term of the 2023-2024 school year and make a recommendation to the Board Education prior to January 1, 2024.

Recommendation 4

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 give permission for their school to share information regarding their child’s McKinney-Vento status with other districts that their child may be attending. (F7)

The recommendation has not yet been implemented, but will be implemented in the future.

The District has not yet implemented this recommendation but will implement this recommendation by January 1, 2024.

Recommendation 5

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. (F8, F9, F10)

The recommendation has not yet been implemented, but will be implemented in the future.

Example: The District has not yet implemented this recommendation but will implement this recommendation by October 1, 2023.

Recommendation 6

By October 1, 2023, a joint task force should be formed by the OCDE composed 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. (F.11, F.12, F13, F14, F15)

The recommendation has not yet been implemented, but BOUSD is ready to participate in such an entity at the direction of OCDE.

Recommendation 8

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. (F11, F12)

The recommendation has not yet been implemented, but will be implemented in the future.

The District has not yet implemented this recommendation but will develop a said plan and deliver it to the Board of Education by May 1, 2024.

Recommendation 9

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. (F13, F14)

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The recommendation requires further analysis.

The District's further analysis regarding this recommendation will be completed and reviewed by the District's superintendent, who will inform the governing board before May 1, 2024.

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 that the Grand Jury devoted to this very important issue.

Sincerely,

A handwritten signature in blue ink that reads "Brinda C. Leon". The signature is fluid and cursive, with a long, sweeping tail on the final letter.

Brinda C. Leon, Superintendent