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**Analysis of Implementation of Student Homeless Programs per County School District in
the State of Georgia**

MPA University of Kentucky

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Capstone Project

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I. Executive Summary

This report investigates the implementation of federal and state policies concerning homeless students within school districts across Georgia. This analysis focuses on understanding how these policies are translated into practical strategies to meet the unique needs of homeless students, encompassing identification, enrollment, and provision of essential support services that result in proof of academic success. Through a combination of policy assessment techniques of current county school district procedures and services offered to students experiencing homelessness and a descriptive assessment of the contents of the current policies through the lens of public administration theories; we will develop a series of key findings that will consist of the amount of funding received in relation to services provided to aid students experiencing homelessness as well as academic proficiency regarding test scores in English Language Arts and Mathematics.

Key Findings:

- Homelessness among students remains prevalent across Georgia, with varying degrees of prevalence among different school districts.
- School districts across the state exhibit diverse approaches to implementing federal and state policies and requirements.
- While most districts offer a range of support services for homeless students, differences are evident in the accessibility and quality of these services.
- Common challenges include inadequate funding, limited resources, and systemic barriers to accessing services.

Recommendations:

- Advocate for increased funding allocation to support homeless student programs and initiatives.
- Provide training and professional development opportunities for educators and staff to enhance their capacity in supporting homeless students effectively.
- Establish robust data-sharing mechanisms to monitor student progress, evaluate program effectiveness, and identify areas for improvement.

II. Introduction

In the state of Georgia, ensuring the educational well-being of all students, including those experiencing homelessness, is vital for the success of these students. In accordance with the federal and state policy aimed at addressing the many needs of homeless students and examining how these policies are conducted at the local level. Implementing such policies allows for each county school district to demonstrate how they support vulnerable populations in their commitment for the student's academic success and well-being regardless of housing situation.

Within this context, this inquiry delves into the mechanisms through which school districts across Georgia navigate federal and state policies to effectively cater to the unique needs of homeless students. This inquiry will be conducted by means of analyzing and comparing the approaches adopted by the following school districts; Cobb, DeKalb, Fulton, and Gwinnett. The goal is to examine the limitations, the strategies employed, and the successes achieved in providing comprehensive support to students experiencing homelessness within the Georgia education system. The following paper will conduct a thorough analysis of the background of these policies, the state of Georgia, and how four major school districts in the state conduct policies on students experiencing homelessness. This paper will attempt to answer the question, **“How effectively do school districts in Georgia implement federal and state policies to meet the needs of homeless students?”**

III. Literature Review

An average American often views the idea of homelessness as an issue concerning only adults who have typically fallen on hard times, turned to drugs, prostitution to support themselves, etc. However, homelessness is a faceless atrocity that is all too common in our society. Possible victims of circumstances could include infants, adolescents, and even college students. This section includes a review of existing literature related to policies impacting public schools' treatment and interaction with homeless students to identify policy trends, gaps in the research, an understanding of intergovernmental relationships and how they are necessary for the implementation of policies and other relevant information including federal, state, and local policies (i.e. public school districts).

Background

Shinn and Khadduri (2020) in *In the Midst of Plenty: Homelessness and What To Do About It* provide a critical analysis of causation, demographics of those affected, and eligibility for assistance. The text also discusses efforts in place to end homelessness, as well as prevention plans for two specific groups experiencing homelessness: “those who are prone to” homelessness and military veterans. This critical analysis will be based around the two major cities of Nashville, Tennessee and Los Angeles, California, but it is first necessary to review the United States Federal Homelessness Policies and Assistance Program.

Franklin D. Roosevelt’s administration developed a homeless services system for major cities to utilize involving income support, housing subsidies, and social services in the form of the *U.S. Department of Housing and Urban Development (HUD)*. However, in the late 1980’s an uptick occurred in which the HUD requested funding with the intended use for ending homelessness must go through a single planning entity called the *Continuum of Care*. To serve the homeless population, this organization became responsible for the data collection and inventory of state programs using government funding for the functions of aid. Due to the integration of federal funding, most communities witnessed their local government, faith-based organizations, and additional nonprofits the development of a supporting network to combat this issue; such efforts often resulted in emergency shelters, transitional housing, and “permanent supportive housing”. While these resources did a good job developing a need assessment, the methodical description and diagnosis of the social needs of those prone to homelessness and military veterans were some missing aspects. For example, this author demonstrates a lack of acknowledgment of the current federal policies. There is evidence that the necessity to confront this human issue was important in development the programs, but an analysis of current federal policies and the “trickle-down” effect of these policies was lacking.

Homelessness Comes to School, written by Murphy, J. F., & Tobin, K. J. (2011), addresses youth homelessness in major cities through public assistance programs like *Temporary Aid to Needy Families (TANF)* and *Supplemental Nutrition Assistance Program (SNAP)*, as well as direct income support or welfare. While these programs are intended to assist single adults, families with dependents and children of school attending age also benefit. Murphy and Tobin discuss that to truly address homelessness, there must be a mixture of increasing levels of federal funding, diminishing eligibility requirements and creating special, one-time assistance programs designed to prevent homelessness. Several assistance programs experienced cutbacks due to inflation and economic recessions under the Reagan administration including public assistance,

job training, job opportunities, and there was also a decrease in the stock of transitional and permanent housing.

Federal Policies

In 1987, the *Stewart B. McKinney Homeless Assistance Act*, now known as the *McKinney-Vento Act*, was developed as the first legislation to aid the students who are homeless. This act provides areas in which educators can pinpoint a framework for acknowledging the problems of homeless children, how to improve the wellbeing of homeless minors, and how to use education as a tool in the battle to end homelessness. The *McKinney-Vento Act* provides the structure to accomplish these goals by working towards the continual removal of barriers to the enrollment and attendance of homeless children and youth and creating conditions that promote substantial parent and teacher integration to form the ultimate package of “enroll, attend, and succeed.”

Lastly, the *McKinney-Vento Act* requires that every state educational agency has an established *Office of State Coordinator for the Education of Homeless Children and Youth*. This office regulates the implementation of the Act by providing resources, coordination, data collection, and overseeing all compliance for all local education agencies. The *McKinney-Vento Act* has required mandates that both the state and the local agencies must follow including immediate access and enrollment for students who are homeless regardless of the presence of required documentation, continuation of education during the homelessness period, and transportation for students who are homeless, and more. The McKinney des a “trickle-down” effect that starts at the federal level and transitions to the state level (Murphy, J. F., & Tobin, K. J. (2011)).

This literature piece did not appear to have gaps or areas that appeared to be missed; however, Murphy, J. F. & Tobin, K. J. (2011) demonstrate the ability to understate the problem of homelessness amongst students and areas that need to be addressed. The next portion of the literature review will focus on the state of Georgia, and the implementation of McKinney -Vento Act and how the state implements homelessness policies for students.

The federal government policy, McKinney-Vento Act, provides for a structured framework in which any participating states must abide by. This allows for an avenue of intergovernmental development with the goal of accountability, proper use of funding, and opportunity for success for any student experiencing homelessness. The state of Georgia

demonstrates intergovernmental coordination between the federal government policy of the McKinney-Vento Act. Georgia uses the same terminology and essentially the same policy with state procedures and implementation such as a definition of homelessness, youth homelessness and measuring housing insecurity.

Georgia Implementation/Policy

The state of Georgia contains 152 counties, each consisting of several school types, ranging from elementary to high school. According to ED Data Express, the state of Georgia for the 2021-2022 School year has approximately 35,000 students (about twice the seating capacity of Madison Square Garden) with no permeant housing, as defined by the state. This total consists mainly of DeKalb, Cobb, Gwinnett, and Fulton County school districts, which are the largest counties in the state in terms of population (*McKinney-Vento Act (2021-2022): Ed Data Express*). *Local education agencies (LEA)* work to review and revise laws, regulations, practices and policies. According to the state of Georgia Department of Education Annual Report-McKinney-Vento Act FY 2023, there is interaction between the Department of Education and the LEAs that may be a barrier for the enrollment, attendance, and success of students who are experiencing homelessness. The Georgia Department of Education also oversees the LEA's creation of the definition of homelessness, see who qualifies, who is eligible for services, and implementation of a local liaison to ensure success of enrollment and academics, as well as the coordination of a local plan required under *Title I* within the needs of children and youth experiencing homelessness. The goal of the coordination between LEA school counselors and the state is to assist and advise those students who are experiencing homelessness to improve college preparation (Georgia Department of Education. (2023).

Intergovernmental Organizations

The cooperation and integration of all governments is necessary to ensure the successful implementation of policies. This section will elaborate on the essential requirements of all agencies involved to work in a cohesive manner. Based on *Understanding Intergovernmental Relations, Twenty-five Years Hence*, written by Brendan F. Burke (2014), there are several phases of intergovernmental relations such as; cooperative, concentrated, creative, competitive, calculative, and contractive. In these phases, particularly starting in 1988, the United States witness a precedent of expanding local aid through revenue sharing, enchainning national statue but also providing local autonomy at both the state and local level. This was able to be conducted

by initiating unrestricted aid. These phases and enhanced autonomy are demonstrated and conducted at the county school district level in Georgia through each county's usage of the funds and the avenues in which services are provided (Burke 2014).

The following section will provide a connection between the research methodology and the literature review with a focus on the question, “**How effectively do school districts in Georgia implement federal and state policies to meet the needs of homeless students?**”

II. Research Methodology

Purpose Statement

The purpose of the research section is to gather accurate and comprehensive data to address any inquiries concerning the question, “**How effectively do school districts in Georgia implement federal and state policies to meet the needs of homeless students?**”, through a descriptive assessment of each county school district's current policies and procedures. Further, the research design section outlines the approach to the data collection, how the data is collected, where the data is found, and limitations and objections. The research method section's goal is to develop neutrality, reliability, validity, and generalization through a descriptive assessment of the contents of the current policies. These methods will include content analysis of available data. Using policy assessment techniques and methods to analyze implementation policies, the study addresses how local school districts in Georgia implement federal and state policies related to homeless students in their districts. The usage of qualitative data methods will analyze the information provided by each school district without using human subjects and numerical data.

This paper's research methodology will be a descriptive assessment of the current policies' contents. of homelessness assistance for students in the state of Georgia within the four largest counties: DeKalb, Cobb, Gwinnett, Fulton. All information will be obtained from public settings such as websites (i.e. each school district website), professional journals (i.e. information found in the literature review), and annual reports (i.e. state and county school district reports). The objective of this research methodology is to review if these counties are implementing the federal programs as designed and intended.

Sample

The sample for this research will see a trickle-down effect starting at the federal policy requirements, the state, and finally the county school district level. The population will consist of students in the state of Georgia. Students will be defined as those currently enrolled in schooling

such as elementary, middle, and high school. Narrowing down the sample set, the focus is on those who qualify as homeless students within the four biggest counties in Georgia; Cobb, Dekalb, Fulton, and Gwinnett. These county school districts in the state of Georgia contain not only population but also those who receive the largest amount of funding from the state.

This research will be conducted at a local (county) school district level with a brief focus on the state and federal levels regarding policy analysis and funding used to address homelessness amongst students.

Techniques and Methods of Analyzing

Utilizing the descriptive design, the collection of all data will be completed through analysis of annual reports of the McKinney -Vento annual reports published at the state level. Through these reports, we will analyze the intended expectations or responsibilities of McKinney -Vento versus the actual results. There will also be documentation examined through the population of the schools of those who will be qualified as homeless and those who have participated in the program. This design method will provide information for a brief analysis of any academic success and “ranking” of each school district will be found. A measurement of the implementation will be completed answering as to whether these Local Education Agency’s (LEA) are implementing their required responsibilities and if the rights of the children are being met and acknowledged.

Influenced by the key ideas of interorganizational relationships based on resource dependence theory (RDT), an analysis of the interactive relationship between the federal, state, and local agencies will be examined. We will examine on how the LEA’s are not self-sufficient and are only able to provide these services are based on the funding and qualifications received by both the federal government and the state of Georgia. Maintenance of this symbiotic relationship can will be seen through Georgia Department of Education and data collected through the annual report of the McKinney-Vento Education for Homeless Children and Youth Program. This paper will also analyze the change in funding and the implementation of each county school district receiving state funding, and the services provided. Through both theories, an examination of each school's organization plan will also be discussed. This will be reflected on whether there is a liaison, as is required by federal law.

Local Educational Agency (LEA) Responsibilities as required by the state of Georgia are seen below:

- Describe the process for identifying and enrolling students experiencing homelessness.
- Describe the services provided to students experiencing homelessness.
- Reserve Title I, Part A funds to provide comparable services for children and youth experiencing homelessness that attend non-Title I schools and provide educational support services to children in shelters and other locations where they live.
- Designate an appropriate staff person as a McKinney-Vento Homeless liaison.
- Develop, review, and revise LEA policies to remove barriers to the enrollment and retention of children and youth experiencing homelessness.
- Describe the process for ensuring transportation that is provided to students experiencing homelessness.
- Collect accurate data on enrolled children and youth experiencing homelessness.

These responsibilities are all in accordance with the rights of the student experiencing homelessness as according to the list below:

- The right to immediate enrollment in school.
- The right to attend school in the school of origin or in the attendance area where the family currently resides.
- The right to receive transportation to school of origin if requested by parents and is in the best interest of the child.
- The right to comparable services as other schoolmates, including transportation and supplemental services.
- The right to attend school along with children who are not experiencing homelessness.
- The rights of students experiencing homelessness are posted in all schools and other places around the community that low-income families and high-risk families may visit.

The following table provides a framework for the research conducted in this paper and criteria used as reference for each school district in regard to any limitation, ultimate goal and initial actions taken.

Table 1. Policy Assessment Criteria

Evaluation Criteria	Administrative Action	Impact on Society
Initial Action of each school district	Did they meet the LEA's responsibilities?	Services offered to student and families
Optimal Impact	Services are being used with positive result	Academic Performance
Negative Impacts	Limited information	Funding
Adaptation and Innovation	Does the school discuss changes of improvement?	Recommendations

Objection/Limitation

As most of the obtained information will be found in the public domain, a possible limitation will be the quality of the data. These limitations may be a lack of recent data within the same fiscal year or school year. An additional limitation regarding data quality would be an inconsistency of able data between each district. A foreseen limitation could also be the lack of public access to information such as applications, surveys and questionnaires for qualifications. Lastly, a lack of generalization may be a hindrance due to the inability to transfer any findings to different districts or even different states.

III. Findings

Local Programs

As previously stated, the four biggest school districts in the state of Georgia are Cobb, Dekalb, Gwinnett, and Fulton; since they are the largest, they are more likely to receive above average amounts of funding regarding schooling. All four of these school district districts developed a homeless education program in accordance with the federal *McKinney-Vento Act* to ensure education rights for children and youth experiencing homelessness.

Cobb County School District has a link to more information about their homeless education program, the name for the McKinney-Vento program, on the front page of the school district's website. Here as well, they inform the public of a full team of staff including a liaison

and liaison-coordinator which comply with the federal and state mandates. The available information defines a homeless student as: those who lack a fixed, regular, and adequate nighttime residences including those living in motels, trailer parks, campgrounds, emergency shelters, sharing transitional housing or those who have been abandoned (*Homeless Education Program*. (2023)). They also define the educational rights of all eligible students in the program. The most concerning area in this brochure was the lack of a definition for those who would fall under the “regular and adequate” category of a homeless student. With such vague terms, it could be detrimental to those who may only fall under a partitioned area of the definition (*Homeless Education Program*. (n.d.)).

Fulton County School District has a different take on the delivery of the program information. Fulton County School District provides details on the *McKinney-Vento Act* as a federal act designed to keep homeless students in school. The website provides a brief definition of a homeless child similarly to Cobb, however, adds an additional description such as “living on the street”, and provides a list of child rights and contact information for two liaisons, although it does lack a coordinator. It also appears that Fulton County School District lacks updated information as data was only from 2013 with several grammatical and punctuation errors as well (*Office of Student Supports / Homeless and Foster Care Program*. (n.d.)).

Dekalb County School District offers very limited information on their programs falling under the social services category. On their website, they do define the term “homeless youth” as well as the direct procedures and policies with which the liaisons will assist the students. However, it appears that there is no direct contact information with the school district’s liaison on the county school district’s website (Malekebu, E. (n.d.)).

Lastly, Gwinnett County Public Schools offers immediate contact information for a social worker through their homeless program but no liaison information. While the information found on the website is consistent with the requirements of the federal policy, there is a deficit in a proper definition of a homeless student as well as the bandwidth in which services will be provided. However, there is a questionnaire available to determine eligibility, such as what type of housing the students qualify for, what resources they are currently receiving, and services that will need to be provided for them.

The following table provides a summary breakdown of each of the county school districts.

Table 2. Summary of Each County School District

Name of School District	Is this school district in compliance with federal policy requirements?	Does this school district define a homeless student? If so, how?	What immediate services are provided for student's	Comparison
Cobb County School District	Yes	Yes. Defines a homeless student as: those who lack a fixed, regular, and adequate nighttime resident including those living in motels, trailer parks, campgrounds, emergency shelters, sharing transitional housing or those who have abandoned	No, immediate services such as questionnaire, survey, etc. However, it provides a list of the student's rights.	When compared to other school district, Cobb County School Districts provides a broad definition of youth homelessness that would qualify more students, and a survey to verify qualification. However, there was no detail provided on the services that could be utilized.
Fulton County School District	Yes	Yes. Defines a homeless student as: those who lack a fixed, regular, and adequate nighttime resident including those living in motels, trailer parks, campgrounds, emergency shelters, sharing transitional housing or those who have abandoned. Adding on the definition of	No. Only information available is contact information and rights of the child.	Fulton County School District while providing a proper definition of youth homelessness, the only available information is where and who to contact. This gap in services provided and additional information is evidently lacking when compared to other counties.

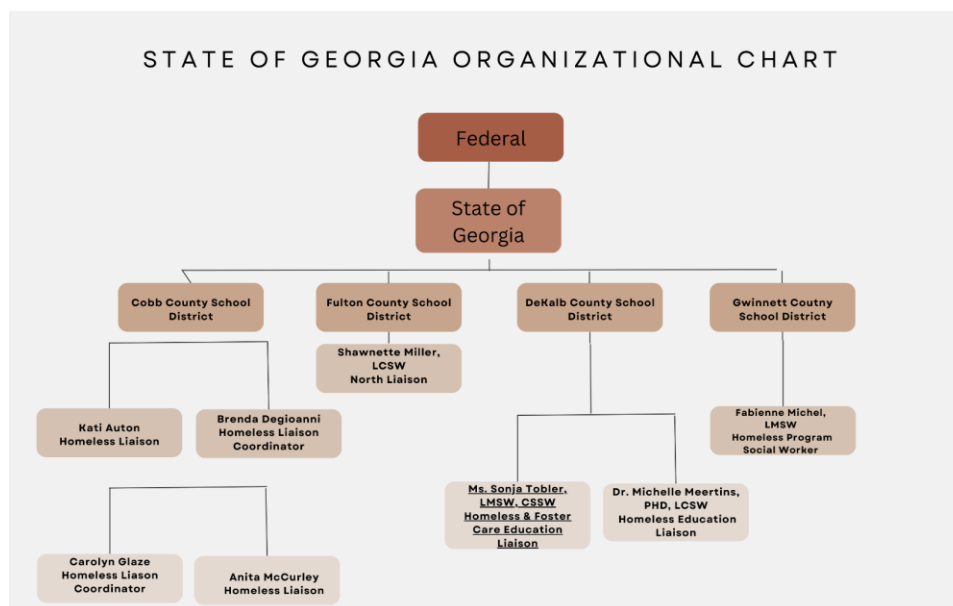
		those who live on the streets.		
DeKalb County School District	Yes	Yes. “Establishes the definition of homeless used by public schools and the educational rights to which homeless children and youth are entitled.”	Yes. facilitating the identification of homeless students; ensuring that homeless students are immediately enrolled; resolving disputes between the school and legal guardians or caregiver, coordinating school transportation services, assistance with school supplies and school uniforms, assistance with credit recovery classes, assistance with senior dues such as graduation cap, gown, and diploma fees, assistance with school required immunizations and vision, hearing, and dental screenings, providing linkage to local community resources to assist with housing needs.	Comparing DeKalb County School Districts, DeKalb offers more. In regard to both definition and services provided, the detailed information is outstanding, making other school districts seem lacking. This evidently factors into the increase in academic proficiency and the range at which services are able to be provided.

Gwinnett County School District	Yes	No	Yes. Timely enrollment, transportation, education related support services, community resource information.	Compared to other county school district, Gwinnett County School district lacks proper definition of youth homelessness and minimal services. This could possibly contribute to their lower test scores.
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The table above shows a visual breakdown of how each county school district will be examined. Within this visual it is evident that while all counties are within the federal and state policy requirements, the majority of them displayed the definition of homelessness that a student would qualify under. Based on the following findings, it is fair to compare that while the county school districts that receive a substantial amount of funding are able to provide more services that could indirectly impact the academic performance of student's experiencing homelessness.

To reiterate the research methodology section, Local Educational Agency (LEA) Responsibilities and the rights of a child. The LEA's responsibilities and the rights of the student experiencing homelessness will serve as the criteria and measurement on how or even if each school district is meeting the necessary needs of the homeless students.

Figure 1. Organizational Chart



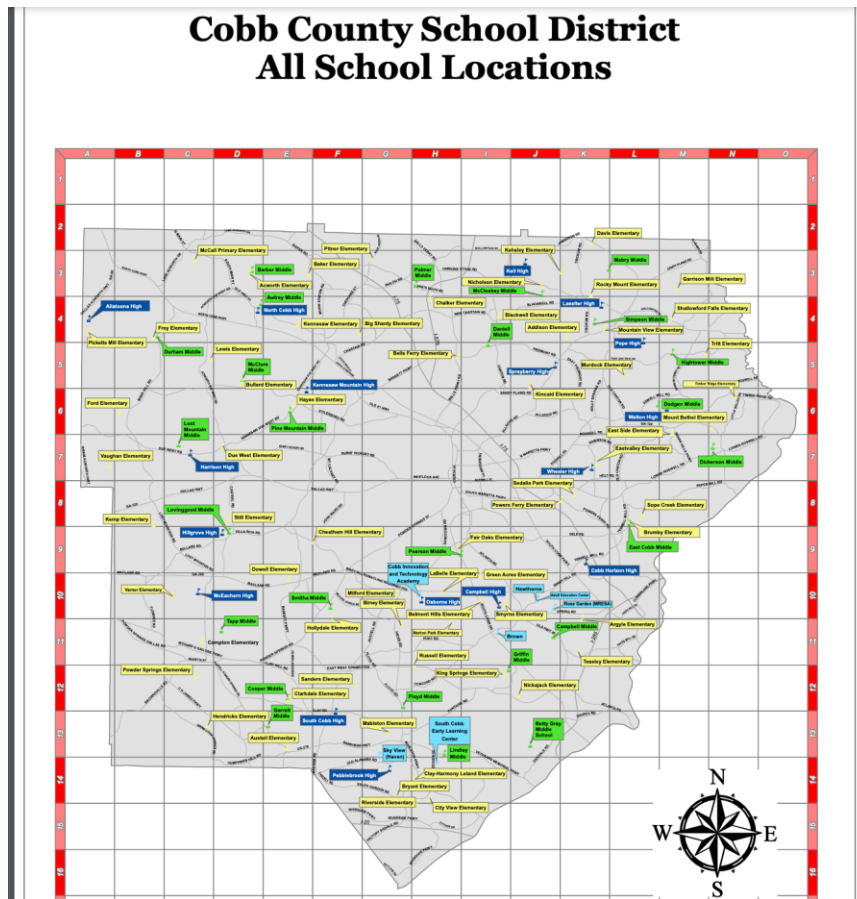
Cobb County School District

According to the Annual Report from the Georgia Department of Education (2022), Cobb County School District received \$94,478 in Homeless Set-Aside funds. The Cobb County School District website provides a clear and concise definition of what qualifies a homeless student. In addition, the school district also is in accordance with the rights of the student declared by the state as seen on their website. The Cobb County School District according to the National Center for Homeless Education provides a variety of forms relating to the enrollment and education of children and youth experiencing homelessness such as: Information on the McKinney-Vento Homeless Assistance Act, (NCHE) Procedure for Free Lunch, Procedure For Transportation to School of Origin, School of Origin Request, Student Residency Statement, Written Notification Form. Additionally, the NCHE indicates that Cobb County School District also provides these forms in four other languages. Referencing back to the Cobb County School District website, the district provides the form JBC(1)-1 and the number for the Homeless Education Program that begins the qualification process, as well as representatives, advisors, and liaisons for the program. According to the National Center for Education Statistics, Cobb County School District in 2017 had approximately 113,151 students enrolled. Out of these 113,151 students, 1,720 were homeless, resulting in a 1.5% rate. Realistically, with the amount of money received by the state Cobb County School District and in accordance with LEA's responsibilities, the county school

district does implement the state and federal policies to meet the needs of the homeless students in their district. Below is an attached map depiction of all the schools in Cobb County to aid on the number of schools per county.

Looking outside the school’s district website, the Georgia Department of Education (GaDOE) has provided a summary data report of each County School District’s implementation of the McKinney -Vento Act (Georgia’s McKinney -Vento Program 2018 Data Report. Sept. 2019). Cobb County School District, in the year 2018-2019, received \$69,367 in grant funds. This school district is ranked 6 out of 48 with a percentile of 15 in English Language Arts and 13 in Mathematics. The additional services provided include the provision of items such as crock pots, hygiene kits, sleeping bags, and clothing to assist homeless families.

Figure 2. Cobb County School District Schools

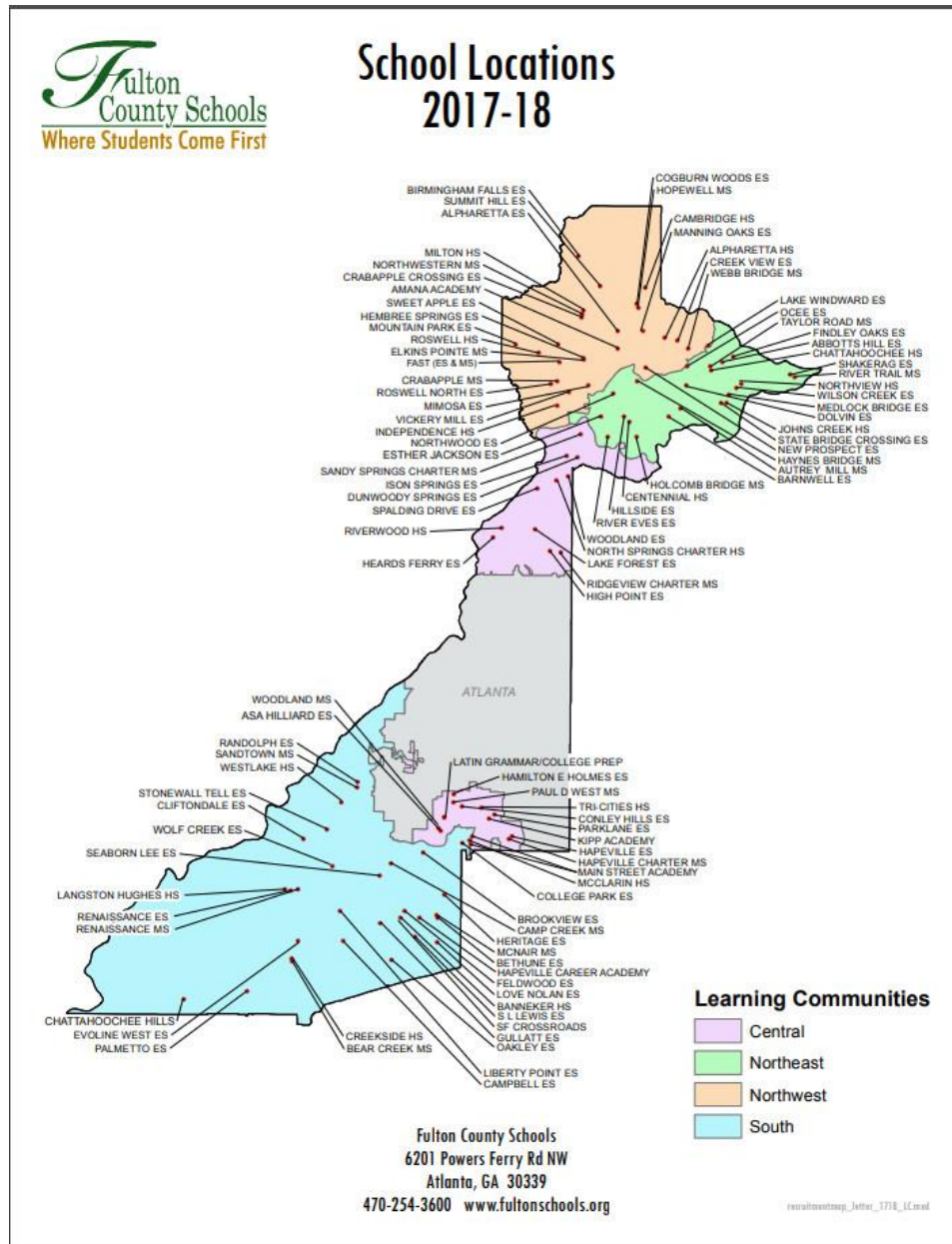


Fulton County School District

According to the Annual Report from the Georgia Department of Education (2022), Fulton County School District received \$43,659 in Homeless Set-Aside funds. This county school district has received a median amount of funding in comparison to the other counties in the state of Georgia. Fulton County School District provides a program for the education of youth and children in transition. Immediately, the school's district website provides the county school district's demonstration of being within accordance with the McKinney -Vento Act as seen in the definition of a homeless child, the rights of the child, and the Act's mission statement. The website also provides additional resources for the national associations that could aid scholarship programs, and college resources for students nearing graduation. Fulton County School District takes on a different approach and provides information from 2013-2014, putting into perspective the reality of this situation in this county school district. This information shows any student who may have experienced homelessness during the 2013-2014 school year. Fulton County School District, while not providing an online application, does provide contact information (a phone number) for the Local Liaison. According to the National Center for Education Statistics, in 2017, out of the 96,122 students enrolled, 1,604 students were considered to be homeless, making this around 1.7% of the student population. While this is a decrease from the information on the Fulton County website, the number is still significantly high. Based on the criteria of the child's rights and the LEA's responsibility, Fulton County School District is in accordance with the McKinney -Vento Act. Below, Figure 3 provides a breakdown of each school within the county's district as of 2018. This demonstrates the vast number of schools within the county school district, providing some light on how funding allocation may be impacted. It is important to note that a portion of Fulton County School District belongs to an entirely separate school district just for the city of Atlanta.

According to the Georgia Department of Education data report of the implementation of the McKinney-Vento Act in 2019, Fulton County School District received \$66,987 in grant funds with a ranking of 5 out of 48 in regard to the homeless population. This student homeless population tests within the 13 percentiles in regard to English Language Arts and 9th percentile in Mathematics. Tutoring services were provided to these students and families enhancing services as well as an uptick in communication between faculty, administrators, and community partners between students and families (Georgia's McKinney-Vento Program 2018 Data Report. Sept. 2019).

Figure 3. Fulton County School District Schools



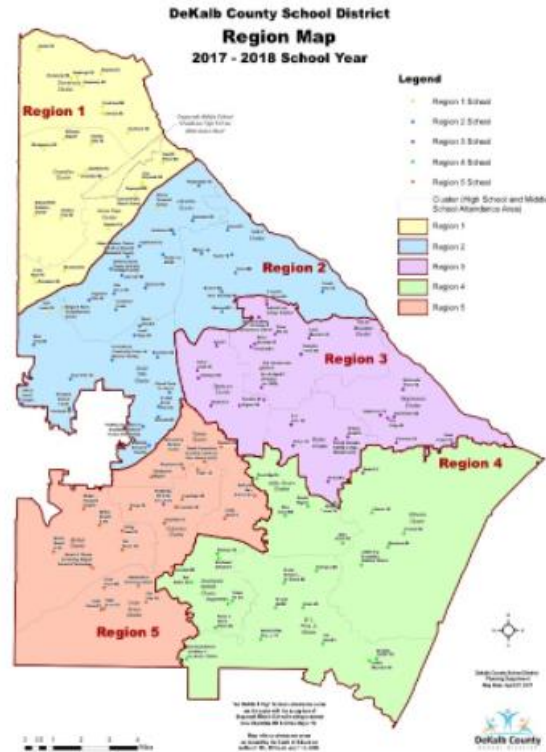
DeKalb County School District

According to the Annual Report from the Georgia Department of Education (2022), DeKalb County School District received \$334,690 in Homeless Set-Aside funds. DeKalb County defines a homeless student as an “individual who lacks a fixed, regular, and adequate nighttime residence.” DeKalb County School District, supported by funding, obtains the ability to have two

liaisons with different focuses: one pertaining to Homeless and additional liaison for foster care education. DeKalb, differing from surrounding counties does provide a list of blanket services they dispense. However, there is a noted absence of the LEA's responsibilities listed for public access. The National Center for Education Statistics states that out of 101,284 students enrolled in the year 2017, around 1,803 (around 1.8%) fell within the parameters of a homeless youth/student. Figure 3 below shows the numbering of schools based on the school district board.

According to a Data Report conducted by the Georgia Department of Education that analyzed the implementation of the federal McKinney-Vento Act, DeKalb County School District received \$70, 967 in grant-awarded funds from Georgia's Mckinney-Vento Program 2018 Data Report. Sept. 2019). This county school district is ranked 1 out of 48 regarding the homeless population. This population is also significantly in the lower percentile in regard to academics with a 10th percentile in English Language Arts and 7th percentile in Mathematics. This county provides additional services according to the data report such as food assistance to families via Kroger or Publix gift cards, food pantry access, and a helpline for students or parents who require immediate assistance Georgia's Mckinney-Vento Program 2018 Data Report. Sept. 2019).

Figure 4. DeKalb County School District Schools



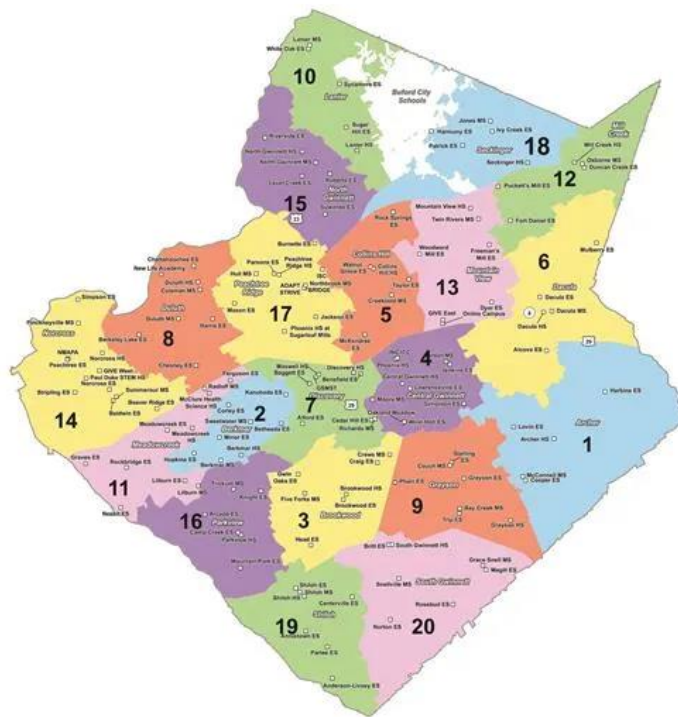
Gwinnett County School District

According to the Annual Report from the Georgia Department of Education (2022), Gwinnett County School District received \$42,500 in Homeless Set-Aside funds. This amount is within the median of most schools receiving aid, with counties like DeKalb being the outliers. Gwinnett County, like the previous counties, offers a Homeless Education Program. This county school district provides a vague and limited list of services they offer. However, Gwinnett County School District does state that this program is functioning through the McKinney-Vento Act. Differing from the other counties information, Gwinnett states the goal of this program outside and in accordance with the federal act. Additionally, while missing a clear liaison as required by the act, Gwinnett County School District does offer training from the Homeless Program Social Worker to families, school, and communities with the goal of promoting awareness and education. Again, differing from other counties, this school district provides a Homeless Education Program Student Residency Questionnaire Link. The survey is locked away from the public as a password is needed.

The Georgia Department of Education (GaDOE) has provided a summary data report of each county school districts' implementation of the McKinney-Vento Act (Georgia's McKinney-

Vento Program 2018 Data Report. Sept. 2019). This data report depicts Gwinnett County School District having 2.58% of students who were homeless in 2018-2019. This same year, they were awarded \$68,947 of grant funds. Gwinnett County School District is ranked 2 out of 48 in regards to the homeless population with these students maintaining an 18th percentile in English Language Arts and 15th percentile in Mathematics. Whereas, students who were not experiencing homelessness qualified at around the 55th percentile for both subjects in regards to academic performance. Additionally, this report, while 6 years old, offered more detailed information on the services the school district provides such as after-school tutorial services, summer school sources, and academic assistance. Figure 5 shows the clusters, or areas in which most schools are condensed.

Figure 5. Gwinnett County School District Schools



All of these county school district have fulfilled the necessary responsibilities of an LEA in accordance with both the federal and state of Georgia requirements. Through the understanding of the RDT theory, it is evident that these county school districts utilize state and

federal funding to deliver services that otherwise would not have been able to be provided. This interdependence relationship between all county school districts and funding receives also brings light into how each county differs in providing services compared to the amount of funding received. For example, Cobb County School District is the highest receipt of state funding, and this shows in the ability to provide several points of contact through liaisons and coordinators as well as a more variety of services such as enrollment and college preparatory services. Also, this county school district seems to have shown the greatest educational advancement in math and ELA percentiles. Whereas DeKalb County School District is ranked 1 out 48 in homeless population and maintains a lower percentile regarding academics. This county, in accordance with the RDT theory, teams up with non-profit organizations such as foodbanks, and a helpline for students or parents requiring immediate assistance. The following section of this paper will discuss recommendations concerning the implementation methods of the mandatory federal McKinney-Vento Act.

IV. Conclusion

Recommendations

The previous findings section attempted to answer the following question, “**How effectively do school districts in Georgia implement federal and state policies to meet the needs of homeless students?**” Despite all four county school districts receiving grant funding, setting aside homeless student aid, and the LEA’s responsibilities each conducted implementation differently.

Evaluation Criteria			
Initial Action of each school district	Optimal Impact	Negative Impacts	Adaptation and Innovation
	Homelessness Student Population (as of 2017)	Amount of Funding Received	Academic Proficiency
County School District Name			
Cobb County School District	1.5%	\$69,367	15 in English Language Arts and 13 in Mathematics
DeKalb County School District	1.8%	\$70, 967	10th percentile in English

			Language Arts and 7th percentile in Mathematics.
Fulton County School District	1.7%	\$66,987	13 percentiles in English Language Arts and 9 th percentile in Mathematics.
Gwinnett County School District	2.58%	\$68,947	18th percentile in English Language Arts and 15th percentile in Mathematics

The age-old recommendation of funding is necessary in this sensitive topic of student homelessness. This funding increase is needed to provide fundamental student services such as access to breakfast and lunch meals, school supplies, college preparatory assistance, and more. While some of these counties have provided minimum services along these lines, an increase in funding would consistently open doors for student success in and outside the classroom. Additionally, these funding could be used for professional development among teachers, faculty, and staff to identify and support any student experiencing homelessness.

While respecting the need for discretion and privacy regarding this sensitive matter, there was evidence of a lack of public access across all four counties. In all four counties, while providing contact information for each liaison or social worker, there was limited availability of what an applicant or even a student who is experiencing to “get the ball rolling”. For example, every school district's website provided contact information, however, no information on the first that would be needed to start within the program such as identification, birth certificate, or any relative documentation needed. Cobb County and Gwinnett County School District were the only ones to come close to providing this information with a questionnaire and an application.

Additionally, there appeared to be a lack of expenditure into what exactly the services that are being provided are. In reference back to Table 3, Gwinnett County School District appeared to be the LEA that provided a more detailed list regarding what services may be provided. Moving forward, a recommendation could fall in line with allowing opportunities for

public record requests pertaining just to the services provided. This would allot for more validity in the school district's use of funding as well as greater opportunities for those who are experiencing homelessness to develop an idea on what the next steps may be.

Lastly, establishing a consistent, accurate and up-to-date database is needed. By establishing data protocol, this would allow for tracking student's success amongst all ages, race, grade level, and income and providing analysis of a program or services effectiveness. All of this would allow for any adjustments that needed to be identified.

In conclusion, the intergovernmental framework provided by the federal government that allows for relative freedom of the state of Georgia implementation of the McKinney-Vento Act has demonstrated a "trickledown" effect in regard to funding and services. The state of Georgia follows the federal policy of definition of homelessness and youth homelessness and the distribution of federal funding. This laissez-faire approach from the state allows for each county to implement and develop procedures and services such as providing college preparedness and adjust services for food banks. However, this laissez-faire approach also leaves much to be desired in regard to tracking data, accuracy, and implementation measurement. Possible recommendations for these county school districts could include an establishment of accurate and consistent database, allowance for public access and records (particularly referencing to services provided), and additional funding that would allow for a diverse availability of training for all personal.

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