

## OPI Guidance for Coding Montana Students as Homeless

When determining a family/student's housing status, it is important to treat the subject of homelessness with compassion and sensitivity. Many families/students do not consider their situation to be one of homelessness. They may become offended or even fearful of what will happen if they are reported as homeless. Liaisons, school secretaries, counselors, and other district personnel should consider using terms such as "family/student in transition" or "between living situations" to describe families/students experiencing homelessness. District staff should assure parents/guardians/students that these are standard housing questions asked of all enrolling students, and the answers determine whether a child is eligible for additional services. District staff are required to ask these questions to identify students who may be experiencing homelessness to provide the best possible education to every child and to connect the family/student to other support services available in the community.

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

**Step 1:** Once the district homeless liaison has identified a child as homeless, he or she should formally notify the enrollment/data clerk in writing to code the child in the district's student information system. The liaison must include the nighttime residence of the child at the time the student is first identified and include information if the child is unaccompanied.

Select the "Homeless" box to begin the identification process.

**Step 2: Selecting the nighttime residence.** There are four choices when selecting the nighttime residence of students experiencing homelessness. It is not necessary to change the nighttime residence information after the child has been identified even if their living situation changes. It is not uncommon for families/students experiencing homelessness to change living situations multiple times during the school year.

1. **Sheltered (code 01):** Families/students 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 student as homeless. Transitional supportive housing for pregnant or parenting teens or for victims of domestic violence also qualifies a family or student 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 or loss of housing due to natural disaster. 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 preference. A family may have experienced eviction, loss of housing due to fire, natural disaster, divorce, domestic violence, or another situation as determined by the homeless liaison. Unaccompanied youths who are "couch surfing" should be listed as "doubled up."

3. **Unsheltered (code 03):** This living situation applies to a family/student who is sleeping in a vehicle, in any type of building not meant for human habitation, or camping out. A family/student who is living in any type of housing that would be considered [substandard](#) would fall into this category. Housing that has been condemned or is otherwise not fit to live in would qualify a family/student as unsheltered. A family/student living in a tent or RV that is in a campground or on private land, including being parked in a driveway or storage facility, is considered unsheltered. In the case of a family/student who is 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, flooding, or other natural disaster should 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 or affordable housing in the community (i.e., the Bakken oil field area), the liaison must determine if the hotel/motel is adequate to provide for the basic educational and developmental needs of the child (full kitchen, bathroom, adequate sleeping room, etc.). 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.

**Step 3: Unaccompanied Youth:** The **Unaccompanied Youth** box should be selected for any student experiencing homelessness who is not in the physical custody (living with) of a legal parent or guardian. Unaccompanied students may be any age. Students who are incarcerated or are under the control of the juvenile justice system are not homeless. Students 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. Students who have been placed in the care of someone other than a parent using a legal document granting permanent or temporary custody are not homeless.

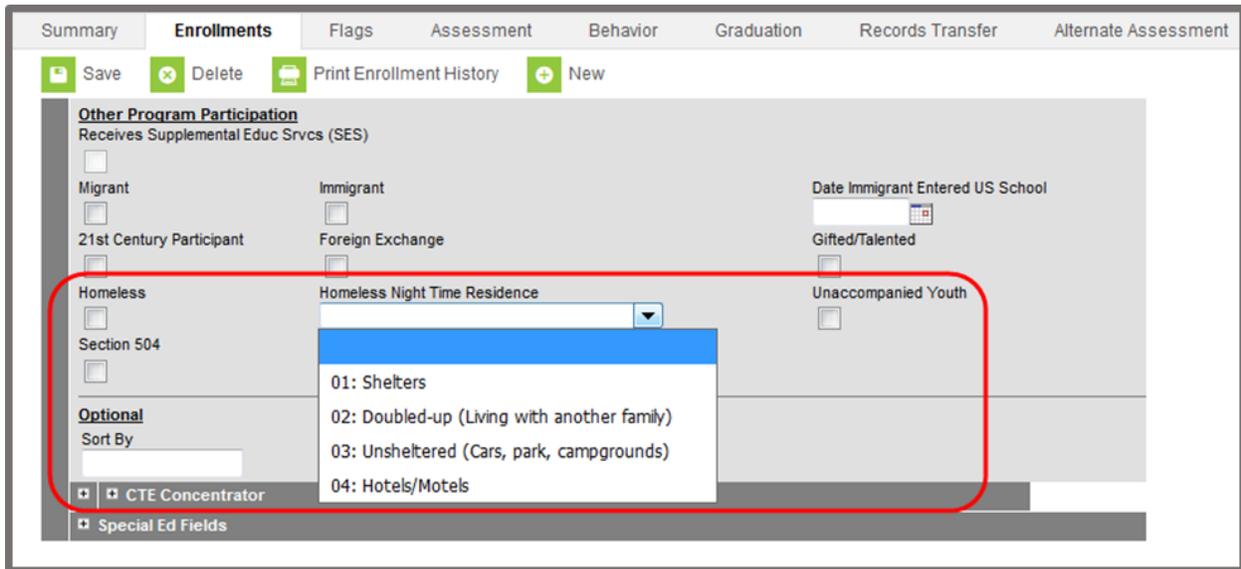
Students who are in the care of family or friends due to loss of housing, including incarceration of the parent, may be considered homeless. However, informal custody arrangements for allowing a student

to complete school in their district of origin are usually not considered a homeless situation. The liaison should investigate the individual circumstances of the student.

Runaway youth or youth who have been asked to leave the home are homeless as defined by the [Runaway and Homeless Youth Act](#). Consult with your local school district regarding possible mandatory reporting requirements 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 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 any youth not living at home, it is important to remember that district personnel are rarely aware of the level of function or dysfunction of a student's family. It is vital 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 are not homeless. Liaisons are encouraged to maintain information on these students for 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.

**Entering data in the AIM System:** Districts may enter the data in AIM via direct entry or through file uploads. Pursuant to federal requirements, the Montana Office of Public Instruction (OPI) has three deadlines for submitting homeless data. Data must be uploaded in October for the fall program participation, in April during the testing snapshot, and in June for the end of the school year program participation report. 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.



Summary | **Enrollments** | Flags | Assessment | Behavior | Graduation | Records Transfer | Alternate Assessment

Save | Delete | Print Enrollment History | New

**Other Program Participation**  
 Receives Supplemental Educ Svcs (SES)

Migrant       Immigrant      Date Immigrant Entered US School  
 21st Century Participant       Foreign Exchange      Gifted/Talented  
 Homeless      Homeless Night Time Residence      Unaccompanied Youth  
 Section 504

**Optional**  
 Sort By

CTE Concentrator  
 Special Ed Fields

Homeless Night Time Residence dropdown menu:  
 01: Shelters  
 02: Doubled-up (Living with another family)  
 03: Unsheltered (Cars, park, campgrounds)  
 04: Hotels/Motels

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 qualifying 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 Children and Youth Program** [webpage](#)

**OPI Interim Homeless Program Coordinator:** Jack O'Connor, 406-444-3083, [joconnor2@mt.gov](mailto:joconnor2@mt.gov)

**AIM Helpdesk:** 406-444-3800, [opiainhelp@mt.gov](mailto:opiainhelp@mt.gov)