



December 21, 2020

Rachel Holzman, Esquire
Deputy Chief
The School District of Philadelphia
Office of Student Rights and Responsibilities
440 North Broad Street
Philadelphia, PA 19130

Dear Ms. Holzman:

This is to inform you that the School District of Philadelphia (SDP) has submitted the necessary documentation to verify that the corrective action pertaining to the appointment of surrogate parents to unaccompanied homeless youth with disabilities, which came as the result of a file review, which took place on February 27, 2020 has been completed. I have received the following documents from the SDP:

- The revised OSS Procedures for appointing a surrogate Parent, which include:
 - Streamlining of forms to make the process easier for school entities to complete in a timely manner.
 - Evidence that the Surrogate Parent Screening Questions have been incorporated, into SDP's registration and surrogate parent assignment process.
- A copy of a memo or email to all relevant staff communicating the requirement to verify the IDEA Parent identified on a homeless student's special education paperwork including the requirement to log the date that the IDEA Parent was confirmed.
- A copy of the training materials that were provided to all SDP guidance counselors regarding the registration and enrollment of homeless students and how to complete the required ECYEH forms and SIS Homeless Tab and a copy of the sign-in sheets verifying that the guidance counselors attended.
- A copy of the SDP's tracking system for the appointment of surrogate parents, which includes a weekly ECYEH report, which is provided to the OSS that includes a spreadsheet with the name of the student, school student attends, and date that the District knew a surrogate was needed (registration with ECYEH or school counselor). The tracking system also includes an OSS Surrogate Assignment spreadsheet, which includes name of student, school, date surrogate was assigned, and name of appointed surrogate parent.
- A list of the SDP's pool of surrogate parents, which currently includes five surrogates. The District is continuing to work on building up the pool of available surrogate parents.

I have been informed that the SDP intends to continue using the Homeless Verification Letter as a tool to assist students with enrollment. It has been explained to me that this letter is provided to families by the SDP so that they do not have to repeat their homeless story/information to multiple people. The letter alerts the person registering the student that they fall under the McKinney-Vento Act and therefore do not need further documentation. The verification letter does not require the homeless youth to sign the letter

to certify his/her eligibility as an unaccompanied homeless youth. The letter is signed by the authorized SDP Homeless Liaison and is used to ensure that the student does not have to repeat the verification of his/her homelessness more often than at the original time of registration.

I have also been informed that the term accompanied youth, as a heading on the SDP's homeless student spreadsheet is used instead of unaccompanied youth because that is the term that the Pennsylvania Department of Education requires on their data reporting. During the registration process when that accompanied column indicates no, then personnel are aware that the student is an unaccompanied homeless youth.

In addition, the SDP has provided this Adviser with updates on those students identified during the file review who may have been in need of a surrogate parent. One of the nine students has been assigned a surrogate parent. Six of the nine students have moved away from the district or graduated and do not require a surrogate parent, at this time, however two of these students are due compensatory education for not having an IDEA parent to support them in their special education needs while enrolled in the SDP. Two of the nine students have biological parents involved in their special education needs.

Due to the continued closure of the SDP schools resulting from the Corona Virus the compensatory education for the two students, who have been named in a separate email, has been postponed and will not be due until schools reopen. At that time, the Superintendent or his designee will convene a meeting to develop a compensatory education agreement and issue a NOREP/PWN to the IDEA Parent or Surrogate Parent of the two students who are owed comp ed. The names of these students will be provided in a separate email. The amount of compensatory education services to be provided will be the number of hours of special education and related service support per day as required in the student's IEP which has been approved by the surrogate parent, from the date that the SDP knew that the student required a surrogate parent to the date that the approved IEP was implemented.

Based on the documentation submitted by the District I have closed the corrective action requirements from the file review. However, BSE will continue to monitor the SDP's appointment of surrogate parents to unaccompanied youth. To ensure the SDP is implementing the required corrective action regarding the identification of unaccompanied homeless youth and the appointment of surrogate parents within 30 days of knowledge that a surrogate is needed, the BSE will conduct a file review of 50 high-school aged homeless special education students who are enrolled in the SDP during the 2020-2021 school year in June 2021. The purpose of the file review will be to determine whether or not the homeless students required a surrogate parent, and if so, whether each student was assigned a temporary and/or permanent surrogate parent within 30 days of knowing a surrogate was needed and to ensure that each homeless special education student was provided with an annual IEP. I will be in touch with you in the Spring to inform you of what information I will need for that file review.

Pending results of the file review the BSE will make a determination as to whether further corrective action will be required by the SDP, which I will inform you of, as well. If you have any questions regarding this issue you may contact me at 610-642-1237 or by email at rfurman@pa.gov.

Sincerely,

Ruth B. Furman

Ruth B. Furman
Division of Monitoring & Improvement – East

cc: Dr. William Hite Jr., Superintendent
ShaVon Savage, Deputy Chief, Office of Specialized Services
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