

Title I Part A Requirements and Guidance on Serving Homeless Students

*Excerpt from the U.S. Department of Education
Education for Homeless Children and Youths Program Non-Regulatory Guidance¹*

M. Coordination with Title I, Part A of the ESEA

M-1. Are homeless children and youths eligible to receive Title I, Part A services?

Yes. Homeless children and youths are automatically eligible for services under Title I, Part A of the ESEA, whether or not they live in a Title I school attendance area or meet the academic standards required of other children for eligibility. (ESEA section 1115(c)(2)(E)). For example, homeless children and youths may receive Title I educational or support services from schoolwide and targeted assistance school programs.

M-2. What are the requirements for coordination between services under Title I and the McKinney-Vento Act?

A State must include in its Title I State plan a description of how the plan is coordinated with the McKinney-Vento Act. (See ESEA section 1111(a)(1)(B)). Additionally, an LEA receiving Title I, Part A funds must include in its local plan a description of how the plan is coordinated with the McKinney-Vento Act. The local plan must describe services provided to homeless children. (ESEA sections 1112(a)(1)(B) and (b)(6)).

M-3. If a homeless child becomes permanently housed during a school year, is that child eligible to receive Title I, Part A services for the remainder of that school year?

Yes. A homeless child or youth who becomes permanently housed during a school year continues to remain eligible for Title I, Part A services for the remainder of that school year. This helps ensure school stability for formerly homeless children. For example, it may be appropriate in certain circumstances for an LEA to use Title I, Part A funds to transport formerly homeless students to or from their school of origin for the remainder of the school year in which they become permanently housed.

¹ Education for Homeless Children and Youths Program Non-Regulatory Guidance

M-4. What types of services may an LEA provide to homeless students with funds reserved under section 1113(c)(3)(A) of the ESEA

Title I, Part A funds may be used to provide a wide variety of services to homeless students. In addition to providing services to assist homeless students in meeting the State's challenging academic standards, Title I, Part A funds may be used to provide services to homeless children and youths, including those in Title I schools, that may not ordinarily be provided to other Title I students. (ESEA section 1113(c)(3)(C)(ii)). For example, to help homeless students effectively take advantage of educational opportunities, an LEA may use Title I, Part A funds to provide, where appropriate, items or services including, but not limited to—

- Items of clothing, particularly if necessary to meet a school's dress or uniform requirement;
- Clothing and shoes necessary to participate in physical education classes;
- Student fees that are necessary to participate in the general education program;
 - Personal school supplies such as backpacks and notebooks;
 - Birth certificates necessary to enroll in school;
 - Immunizations;
 - Food;
 - Medical and dental services;
 - Eyeglasses and hearing aids;
 - Counseling services to address anxiety related to homelessness that is impeding learning;
 - Outreach services to students living in shelters, motels, and other temporary residences;
 - Extended learning time (before and after school, Saturday classes, summer school) to compensate for lack of quiet time for homework in shelters or other overcrowded living conditions;
 - Tutoring services, especially in shelters or other locations where homeless students live;
 - Parental involvement specifically oriented to reaching out to parents of homeless students;

- Fees for AP and IB testing;
- Fees for college entrance exams such as SAT or ACT; and
- GED testing for school-age students.

Two principles govern the use of Title I, Part A funds to provide such services to homeless students.

- First, the services must be reasonable and necessary to assist homeless students to take advantage of educational opportunities. (ESEA section 1113(c)(3)(A); 2 CFR § 200.403(a)).
- Second, Title I, Part A funds must be used only as a last resort when funds or services are not available from other public or private sources, such as the USDA's National School Lunch Program and Breakfast Program, public health clinics, or local discretionary funds (sometimes provided by the PTA) used to provide similar services for economically disadvantaged students generally. (*See* ESEA section 1115(e)(2)).

M-5. In an LEA with Title I and non-Title I schools, are homeless children and youths who attend non-Title I schools eligible to receive Title I, Part A services?

Yes. Under section 1113(c)(3)(A) of the ESEA, an LEA must reserve sufficient Title I funds to provide services to homeless students who attend non-Title I schools that are comparable to those provided to students in Title I schools.

- These services may include providing educationally related support services to children in shelters and other locations where homeless children live. Services should be provided to assist homeless students to effectively take advantage of educational opportunities.
- In addition to serving homeless children and youths who attend non-Title I schools, as described in question M-4, the homeless set-aside may be used to provide services to homeless students in Title I schools that are not ordinarily provided to other Title I students.

M-5a. Does the ESEA require an LEA to reserve Title I funds under section 1113(c)(3) if all schools in the LEA are Title I schools?

Yes. Regarding applicability of the homeless reservation to an LEA that has all Title I schools, prior to the changes made by the ESSA, the ESEA required that an LEA reserve funds necessary “to provide services comparable to those provided to children in [Title I schools] to serve homeless children and youths who do not attend [Title I] schools, including providing educationally related support services to children in shelters and other locations where children may live.” (Emphasis added.)

- The ESSA amendments to this section removed the italicized language. As a result, the statute no longer speaks to using this reservation for homeless students who are not attending Title I schools. Instead, the ESEA now more generally requires an LEA to reserve Title I funds necessary to provide educationally related support services to homeless children and youths regardless of whether they attend a Title I school. In other words, this required reservation applies when all schools in an LEA are Title I schools (including Title I schoolwide schools) and when an LEA has Title I schools and non-Title I schools.
- If an LEA has a mixture of Title I and non-Title I schools, an LEA may use this reservation to provide regular Title I services to homeless students attending non-Title I schools, as well as to provide homeless students with services not ordinarily provided to Title I students, regardless of whether the homeless students attend Title I or non-Title I schools (see ESEA section 1113(c)(3)(C)(ii)). Likewise, if an LEA has all Title I schools, it may use this reservation to provide its homeless students with services not ordinarily provided to other Title I students.

M-6. How should an LEA determine the amount of funds to reserve for comparable services under Title I, Part A?

Funds reserved for comparable services under section 1113(c)(3)(A)(i) of the ESEA may be determined based on a needs assessment of homeless children and youths in the LEA, taking into consideration the number of homeless children and youths identified by the LEA and their unique needs. This needs assessment may be the same as the needs assessment conducted by the LEA in applying for local McKinney-Vento subgrant funds. (ESEA section 1113(c)(3)(C)(i)).

M-6a. Does the ESEA require an LEA to reserve a specific amount of Title I funds to serve homeless students under section 1113(c)(3)?

No. The ESEA does not prescribe a specific amount. However, the ESEA requires that the amount be sufficient to provide services to homeless children as described above. Although not required, if only a small number of homeless students are identified in an LEA, an LEA may wish to use a districtwide per pupil amount for homeless students if this approach yields a reservation amount that is sufficient for the LEA to meet these requirements. When a greater number of students are identified as homeless, LEAs may find it helpful to use past years' enrollment and cost data on expenditures to determine the next year's reservation.

- Additionally, as authorized under ESEA section 1113(c)(3)(C)(i) and described more fully in question M-6, an LEA may use a needs assessment to determine the reservation amount. Finally, as noted above, the homeless reservation may be used to provide homeless children and youths with services not ordinarily provided to other Title I students, including to fund a local liaison's salary and expenses and to defray the excess cost of school of origin transportation. LEAs may therefore consider these costs as well when calculating the amount of the Title I homeless reservation.

M-7. What kind of needs assessment should LEAs conduct related to homeless children and youths to determine a suitable set-aside for comparable services and additional educational support services?

One method for the LEA needs assessment is to look at homeless student enrollment averages or trends in the district over a two- or three-year period and the average per-pupil cost of providing Title I-funded services in the current fiscal year and multiplying those two numbers. However, the needs of homeless children and youths that affect their enrollment, attendance, and success in school can be unique and distinct from housed students and should be reviewed periodically and regularly, at least more than once per school year.

- Other factors to consider are the presence of other State and Federal education grants that can provide the same or similar services as well as other community resources; these also change annually or regularly. Finally, the LEA should consider what is necessary and reasonable for each student to fulfill the purposes of the Title I and McKinney-Vento programs in their district, as well as the effectiveness of past activities in accomplishing the goals of those programs for individual students as well as the overall programs.

M-8. What is an LEA required to include in its Title I, Part A plan regarding services for homeless students?

Under section 1112(b)(6) of the ESEA, an LEA must describe in its Title I, Part A plan the services it will provide homeless children and youths, including services provided with funds reserved under section 1113(c)(3)(A) of the ESEA, to support the enrollment, attendance, and success of these children and youths. An LEA's Title I, Part A application also should include a description of the method used for determining the amount reserved, whether by a needs assessment or some other method (e.g., past homeless student enrollment and support service cost data), and how the liaison was consulted or involved in determining the set-aside.

M-9. Is a State required to include homeless children and youths in its academic assessment system?

Yes. A State must include homeless children and youths in its academic assessment system, consistent with section 1111(b)(2)(vii) of the ESEA. In addition, under section 1111(h)(1)(C)(ii)-(iii) of the ESEA, State and LEA report cards must include information on student achievement on the State's assessments and high school graduation rates, disaggregated by homeless status, starting in the 2017-2018 school year.

M-10. May Title I, Part A funds reserved under section 1113(c)(3)(A) of the ESEA be used to fund the local liaison position?

Yes. Title I, Part A homeless set-aside funds may be used to fund all or part of the homeless liaison's salary even if that person has no Title I duties. (ESEA section 1113(c)(3)(C)(ii)(II)). In larger districts with significant numbers of identified homeless students enrolled, an LEA may also use Title I funds to support, as necessary, additional staff carrying out the required duties of the local liaison.

[1] In general, under the ESSA transition provisions, as clarified by the Consolidated Appropriations Act, 2016, during the 2016-2017 school year, States and LEAs must continue to implement Title I, Part A in accordance with the requirements that were in effect prior to enactment of the ESSA (i.e., the requirements under the No Child Left Behind Act).

Tips for Facilitating Collaboration Between Title I and McKinney-Vento Act Programs

The Title I, Part A program is a significant Federal education resource for the education of homeless children and youths. While McKinney-Vento Act subgrants are received by or cover approximately 20 percent of all LEAs, Title I, Part A homeless education requirements impact homeless children and youths in significantly more LEAs.

Therefore, effective coordination between these two programs (given the requirements in both programs to serve homeless children and youths) can have substantive impacts on many homeless students.

Consider the following recommendations for facilitating stronger collaboration:

- Ensuring that LEA local liaisons attend Title I conferences and in-service days and that Title I coordinators attend homeless education conferences and in-service professional development days;
- Encouraging local Title I coordinators and LEA local liaisons to work together to develop and implement a plan that identifies ways that Title I funds and programs will serve children and youths experiencing homelessness;
- Encouraging collaboration between the State Title I coordinator and the State McKinney-Vento coordinator on the State Title I plan or the State consolidated plan;
- Sharing Title I and Homeless Education handbooks with other program staff;
- Collecting and sharing within and across districts concrete data on the needs of homeless children and youths;
- Leading district-wide efforts to make organizational accommodations for eligible students, as necessary, in such areas as transportation, remaining in the school of origin, records transfer, class scheduling, and special services that will help them enroll, attend, and succeed in school;
- Ensuring that the needs of highly mobile students are included in the school improvement plans and not addressed as a separate issue;
- Establishing and widely disseminating information on district-wide policies, procedures, and guidelines to identify and serve eligible students;
- Ensuring State Coordinator and local liaison representation on the State Committee of Practitioners; and
- Including homeless parents in Title I parental involvement policies and creating opportunities for homeless parents to be involved.