

Title I, Part A and Students Experiencing Homelessness

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Agenda

- Program Overview
- Title I, Part A Homeless Set-aside
 - Requirement to reserve funds for homeless students
 - Determining the homeless set-aside amount
 - Use of funds and allowability
 - Collaboration
- Resources & Questions



Program Overview



Purpose of the Education for Homeless Children and Youth Program

- The purpose of the McKinney-Vento Education for Homeless Children and Youths (EHCY) Program is to ensure that each homeless child or youth **has equal access to the same free, appropriate public education**, including a public preschool education, as provided to other children and youths.

McKinney-Definition of Homeless

- **Lacking a fixed, regular, and adequate nighttime residence:**
 - Sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason;
 - Living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations;
 - Living in emergency or transitional shelters, or are abandoned in hospitals;
 - Living in a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings;
 - Living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and
 - Migratory children living in the above circumstances.



Title and McKinney-Vento

- The McKinney-Vento Act addresses many of the challenges faced by students experiencing homelessness, but Title I, Part A also plays a significant role in supporting their academic achievement. Both statutes include requirements for coordinating the two programs.

Title I Part, A Homeless Set-Aside

Requirement to Reserve Funds

- §1113(c)(3)(A) of the Every Student Succeeds Act (ESSA) requires all Local Education Agencies (LEAs) to reserve “such funds as may be necessary” to provide services for homeless children at Title I and non-Title I schools.
- Funds must be reserved,
 - Regardless of receiving a McKinney-Vento Homeless Assistance Grant.
 - Even if no homeless students are currently identified in the LEA.
 - Even if all schools in the LEA are Title I schools.
- Homeless set-aside funds must address the educational needs of homeless students.

Homeless Set-Aside Funds

- Must be used to provide comparable services to those provided to children in Title I schools.
- May be used to remove barriers that prevent regular attendance or provide additional support such as tutoring, before/after/summer school programs.
- May be used to meet basic needs of students experiencing homelessness so they may participate more fully in school (clothing, supplies, health).
- May be used to provide transportation to a homeless student's school of origin.

Principles Governing the Use of Funds

- Two principles govern the use of Title I, Part A funds to provide services to students experiencing homelessness:
 - The services must be reasonable, allocable and necessary to assist homeless students to take advantage of educational opportunities.
 - 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 U.S. Department of Agriculture's (USDA) National School Lunch Program and Breakfast Program, public health clinics or local discretionary funds used to provide similar services for economically disadvantaged students generally.

Reasonable, Allocable and Necessary

- Reasonable (See [2 CFR 200.404](#))
 - Not excessive in cost and based on prudent and sound purchasing practices.
- Allocable (See [2 CFR 200.405](#))
 - Incurred specifically for the benefit of the program, distributed proportionately, an allowable activity and meets the programs' intent.
- Necessary (See 2 [CFR 200.403\(a\)](#))
 - Essential for carrying out the needs-based program.

Methodology

- The homeless liaison and Title I coordinator should work together to determine an appropriate set-aside amount.
- Things to consider:
 - Other available funding sources, community partners, etc.
 - Services and supports provided by community partners
 - Number of students identified as homeless
 - Needs of currently identified students
 - Professional development opportunities for the homeless liaison
- Conducting a needs assessment with families can provide insight into their needs as well as how the district can best support them.

Determining the Set-Aside Amount

- There is no set formula for determining the set-aside amount, but the methodology used must be included in the Title I, Part A application.
- The U.S. Department of Education (ED) has identified several possible methodologies LEAs may choose from.
- Additional guidance is available in The National Center for Homeless Education's (NCHE) [Determining Title I Set Aside document](#).

Questions to Consider for Determining the Title I, Part A Homeless Set Aside

Meeting Date:

Participants:

LEA Liaison:

Title I Coordinator:

Others:

Identification of Homeless Children and Youth

Questions	Notes
How many homeless students has the LEA identified in the past three years? <ul style="list-style-type: none">• Are the numbers increasing or decreasing?• Are there any economic trends in the community that would indicate a rise in the number of homeless children and youth and their families?	
What is the level of poverty in the LEA? (Use Free and Reduced Meals, Census, or KidsCount data.)	
In comparing the number of homeless children and youth identified in the LEA with other data sources indicating community child poverty levels, to what extent <ul style="list-style-type: none">• Are the number of homeless students identified reasonable in relation to the level of child poverty?• Is there a need for greater outreach and training to identify all homeless children and youth in the LEA?	
What is the count of homeless children and youth in shelters? If the shelter count is not significantly lower than the number of homeless children and youth identified by the LEA, to what extent is there a need for greater outreach and training to identify homeless children	

Possible Methodologies

- Conduct a needs assessment to determine the services homeless children need and the appropriate amount to pay for them.
- Obtain a count of homeless students and multiply the number by the district's Title I, Part A per-pupil allocation (PPA).
- Reserving a specific percentage based on your district's poverty level or total Title I, Part A allocation.
- Using historical homeless expenditure data to determine an appropriate amount.

Needs Assessment

- A variety of data points may be used to develop the needs assessment.
 - Surveys
 - Testing scores
 - Absenteeism rates
- Survey responses may bring to light needs that the district had not previously considered.
- A needs assessment may provide a more tailored approach as opposed to a flat PPA or percentage.

Per Pupil Amount

- Title I, Part A funds are allocated to participating schools using PPAs.
- There is no minimum allowable PPA set by ED or the Tennessee Department of Education (TDOE); however, the amount should be sufficient to meet the needs of identified students.
- Consider all the needs a homeless student may have over the course of a school year—approximately how much would it cost to meet those needs?

Historical Spending

- If the number of identified homeless students has not changed drastically, historical spending may provide some insight into future expenditures.
- Consider the amount reserved in previous years as well as the services and supports provided.
- Was the reservation sufficient to meet all identified needs?
- Are there any additional supports that could be provided?

Uses of Funds

- Homeless set-aside funds must be used to provide supplemental supports and services.
- Title I funds reserved for homeless children and youth may be used for services not ordinarily provided by Title I.
- Funds may be used for the homeless liaison's salary as well as transportation to a homeless student's school of origin.
- NCHE's Serving Students Experiencing Homelessness Under Title I, Part A brief contains some example allowable uses of funds.

Title I, Part A Homeless Set-Aside Uses

Examples of Allowable Expenditures*

- Clothing/shoes necessary for participation in classes
- Student fees necessary to participate in general education program
- Personal school supplies
- Acquisition of birth certificates
- Immunizations
- Medical & dental referral services
- Eyeglasses & hearing aids
- Counseling services
- Extended learning time
- Extracurricular activity fees
- Tutoring services
- Parental involvement activities
- Fund all or part of the homeless liaison's salary
- Excess cost of transporting students to and from their school of origin

****But not limited to these***

Source: ESEA § 1113(c)(3)(C)(ii) and EHCY Non-Regulatory Guidance, pg. 38-39

Unallowable Items

- **Never Allowable**

- Rent
- Utilities
- Social and entertainment expenses
- Prom, senior trips, etc.
- Non-Educational Related Field Trips

Avoid “Stocking Up”

- Funds should be used on the needs of currently identified students.
- Using funds to stock up on supplies for future homeless students is not a best practice and should be avoided.
 - Not needs-based
 - Funds not being spent on students who generated them.
 - It becomes harder to track all of the supplies and ensure they’re provided to homeless students.

Role of Community Partners

- Many LEAs are fortunate to have community partners that help provide support for homeless students.
- Community partners often provide some of the more “basic” items (clothing, school supplies, shoes, etc.), thereby allowing the district to focus the majority of set-aside funds on educational needs.
- It is unlikely that community partners are meeting all the needs of homeless students; there are still plenty of supports the LEA is able to provide.

Focus on Educational Needs

- Funds should be used to help homeless students achieve educational success by ensuring that they have meaningful participation with positive outcomes.
- Consider your LEA's data—what is it telling you that homeless students need?
 - Tutoring
 - Supports to address chronic absenteeism
 - Credit recovery support to address higher drop-out rates
 - Post-secondary readiness preparation
 - Programs that benefit highly mobile students
 - Transportation to extracurricular activities

Professional Development

- Funds can be used for professional development for the homeless liaison and other staff working with homeless students.
- This could include:
 - Registration and travel expenses for conferences such as National Association for the Education of Homeless Children and Youth (NAEH CY).
 - Supplies for in-district professional development, book studies, etc.

Collaboration

- The Title I coordinator and homeless liaison should work together to determine an appropriate amount of funds to be reserved for homeless students.
- Topics to discuss:
 - Number of homeless students enrolled during the previous school year.
 - Amount of Title I funds used to provide services for those students.
 - Students' greatest unmet educational needs.
- Meetings between the Title I coordinator and homeless liaison should occur throughout the school year.
- The Title I coordinator and homeless liaison should be very familiar with each other's program.

Working with Family Resource Center

- The family resource center (FRC) coordinator often works closely with the homeless liaison as there is often a lot of crossover between the populations they serve.
- While this collaboration is beneficial, it's important to maintain separate funding streams.
 - The allowability of certain purchases varies between the two programs.
 - FRC funds can benefit students not identified as homeless.

Things to Consider

- What methodology do you use to determine the homeless set-aside?
- What are the strengths of your chosen methodology?
- Have you identified any opportunities for improvement regarding your methodology?
- If you use a needs assessment, what does that process look like? What data do you review to help inform your decisions?
- If you use a PPA, how do you determine the amount?

Tips, Resources, & Questions

Tips and Recommendations

- Establish standing meetings between the homeless liaison, Title I coordinator and other staff as applicable.
 - Discuss services, budgets, timely spending of funds, etc.
- Collaborate on a needs assessment.
- Train staff on the availability and allowable uses of set-aside funds.

Resources

- [ePlan](#) > TDOE Resource > ESSA Information, Guidance, PPTs, & Webinars > Title IX, Part A Education for Homeless Children & Youth > McKinney-Vento Toolkit and Resources 2023
- [Serving Students Experiencing Homelessness under Title I, Part A](#)
- [SchoolHouse Connections Title, Part A: Law, Guidance, and Use of Funds](#)
- [U.S. Department of Education \(ED\): McKinney-Vento Law and Guidance](#)
- [Education for Homeless Children and Youths Program Non-Regulatory Guidance](#)
- [National Center for Homeless Education \(NCHE\):](#)
 - [NCHE Homeless Liaison Toolkit](#)
 - Homeless Education Helpline: (305)306-8495 or NCHE.helpline@safalpartners.com
- [SchoolHouse Connection](#)





Questions?

Please Share your Feedback:

- You may access the PD by navigating here:
<https://forms.office.com/r/eVtWEAZ9xZ>





Thank You!

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