

Strategies for Collaboration between McKinney-Vento Programs and Title I, Part A for Serving Students Experiencing Homelessness

(adapted from NCHE "Law into Practice Brief")

While many challenges faced by students experiencing homelessness are addressed by the McKinney-Vento Act, Title I, Part A also plays a significant role in supporting the academic achievement of these students. Requirements for coordination between the two programs are included in both statutes.

This handout explains how Title I, Part A of the ESEA, as amended by the Every Student Succeeds Act of 2015 (ESSA), and the McKinney-Vento Act, as amended by the ESSA, intersect, and offers strategies for effective cross-program collaboration. The McKinney-Vento Act requires every school district to appoint a local homeless education liaison to serve as the district's key homeless education contact, and oversee the implementation of the Act in schools throughout the district. As part of their responsibilities, local liaisons must coordinate and collaborate with other school personnel responsible for providing services to students experiencing homelessness. Title I, Part A requires that programs operated under its authority coordinate at the State and local levels. All districts receiving Title I, Part A funds must include in their local plans a description of how the district's Title I, Part A program is coordinated with its McKinney-Vento program. The development of the local plan should include timely and meaningful consultation with the local liaison, and must describe the Title I, Part A services that will be provided to students experiencing homelessness, including through the homeless set-aside.

In addition to meeting each program's statutory requirements, cross-program coordination provides an opportunity to optimize resource allocation. In order to meet the needs of all students, including students experiencing homelessness, it is critical that both programs work together to leverage resources to the greatest extent possible.

Title I, Part A requires school districts to reserve sufficient Title I funds to provide services to students experiencing homelessness that are comparable to those provided to students in Title I schools. Homeless set-aside funds may be used to provide comparable services to students experiencing homelessness who do not attend a Title I school, but also may be used to provide services to students experiencing homelessness, including those attending Title I schools, that are not ordinarily provided to other Title I students, including funding the local liaison position, and funding transportation to and from the school of origin.

ALLOWABLE USAGES OF SET-ASIDE FUNDS

Two principles govern the usage of homeless set-aside funds:

1. The services must be reasonable and necessary to assist students experiencing homelessness to take advantage of educational opportunities.

2. The funds must be used only as a last resort when funds or services are not available from other public or private sources.

With these principles in mind, allowable usages of set-aside funds may include, but are 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;
- birth certificates necessary to enroll in school;
- immunizations;
- food items;
- hygiene items;
- 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;
- extra-curricular activity fees;
- parental involvement specifically oriented to reaching out to parents of homeless students;
- graduation caps, gowns and yearbooks;
- fees for Advanced Placement (AP) and International Baccalaureate (IB) testing;
- fees for college entrance exams such as the SAT or ACT;
- GED testing;
- Gift cards(if appropriate);
- Funding all or part of the liaison salary; and
- Transportation costs to and from the school of origin.

DETERMINING TITLE I, PART A SET-ASIDE AMOUNTS

Determining an appropriate homeless set-aside amount requires coordination between the school district's Title I, Part A and McKinney-Vento programs. The set-aside may be determined based on an assessment of the needs of students experiencing homelessness within the district, considering both the number and needs of these students. This assessment may be the same as the needs assessment conducted as part of the district's McKinney-Vento subgrant application process (if applicable).

Districts should establish their own methods for determining their homeless set-aside. When determining the set-aside amount, the Title I director and local liaison should collaborate to

gather and review relevant data in order to ensure sufficient Title I, Part A funds are reserved to meet the needs of students experiencing homelessness.

Once a district has identified the needs of students experiencing homelessness to be addressed, the amount of funds necessary to provide services should be determined. In addition to planning interventions based on student needs, planned services should be of sufficient time and intensity to affect students' academic outcomes.

Possible methods for calculating the set-aside amount include:

- determining a percentage of the district's Title I, Part A funds to reserve for the homeless set-aside;
- multiplying the number of students experiencing homelessness identified by the district by the Title I, Part A per-pupil allocation;
- matching the amount of McKinney-Vento subgrant dollars received by the district, if applicable; or
- adjusting previous set-aside amounts based on past set-aside expenditures and trend data, such as the number of students experiencing homelessness identified, these students' academic outcomes and educational needs, and changes to the community's poverty levels and/or economy.

Determining the Title I, Part A Homeless Set Aside Amount

A Work Sheet to Guide a Conversation between Local Educational Agency Homeless Liaisons and Title I Coordinators

(Adapted from the 2018 Title I Work Group Convened by the National Center for Homeless Education)

The Elementary and Secondary Education Act (ESEA), as amended by the Every Student Succeeds Act (ESSA), 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 *and* to provide for their unique needs. Local educational agencies (LEAs), whether they have identified many or few homeless students, often struggle to determine an appropriate Title I, Part A homeless set aside amount. The Education for Homeless Children and Youths Program Non-Regulatory Guidance suggests the following for determining 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 work sheet provides questions to guide an initial conversation between LEA homeless liaisons and Title I coordinators concerning the needs of homeless students in the school district. The LEA homeless liaison and Title I coordinator, along with any other staff or

stakeholders, should meet to discuss the questions in the worksheet. Any data that can be gathered before the meeting would provide a concrete basis for needs discussed.

The questions cover six of the most critical areas of services for homeless children and youth for which LEAs allocate Title I, Part A homeless set aside funds:

- identification of homeless children and youth
- LEA capacity to serve homeless children and youth
- meeting academic needs of homeless children and youth
- meeting unique needs of homeless children and youth
- serving preschool-aged homeless children
- meeting school transportation needs of homeless children and youth

Although the work sheet is not a complete needs assessment, it is a useful tool to strengthen coordination between the homeless education program and Title I, Part A program and to begin the process for determining an appropriate Title I, Part A homeless set aside allocation to meet the needs of homeless students.

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

1. Identification of Homeless Children and Youth

How many homeless students has the LEA identified in the past three years?

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

- 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 and youth who meet other components of the McKinney-Vento definition of homeless, such as those living in doubled-up situations?

2. Capacity to Identify and Serve Homeless Children and Youth

What percentage of time is allocated for the homeless liaison position and other positions to serve homeless children and youth in the LEA?

To what extent does this staff allocation allow the LEA to carry out all the requirements in the McKinney-Vento Act?

What awareness and outreach do the local liaison conduct to identify homeless children?

Are these efforts sufficient to identify all homeless children in the community? What further outreach and training need to take place to help identify homeless children and youth? What indications exist that more time is needed for staff to serve homeless children and youth? For example, which of the following has the LEA experienced?

- Enrollment barriers for homeless students
- Disputes over eligibility or school selection or enrollment in a school
- Lack of individualized attention to assess each homeless student's needs and connect the student to services
- Minimal community collaborations and partnerships

3. Meeting the Academic Needs of Homeless Children and Youth

What are the academic proficiency rates of homeless children and youth on state assessments compared to other students in the LEA? Compared to the overall state averages? Compared to other economically disadvantaged students?

What is the level of chronic absenteeism among homeless students as compared to the LEA and state average?

What is the graduation rate for homeless youth as compared to the LEA and state average?

How many homeless students participate in tutoring programs or other academic supports, both during the school day and outside of school, as compared to the total number of homeless students identified in the LEA?

How many homeless students are served by Title I programs? How does this number compare to the number of homeless students identified in the LEA?

What supports or programs exist to educate or re-engage homeless youth who are not attending school?

What supports or programs exist to help homeless youth with credit accrual and recovery and with preparation for post-secondary education?

4. Meeting the Unique Needs of Homeless Children and Youth

What is the level of homeless students' unique and unmet needs for items such as those listed in the federal guidance as types of services an LEA may provide to homeless students with funds reserved through the Title I, Part A homeless set aside?

- 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;
- birth certificates necessary to enroll in school;
- immunizations;
- food items;
- hygiene items;
- 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;
- extra-curricular activity fees;
- parental involvement specifically oriented to reaching out to parents of homeless students;
- graduation caps, gowns and yearbooks;
- fees for Advanced Placement (AP) and International Baccalaureate (IB) testing;
- fees for college entrance exams such as the SAT or ACT;
- GED testing;
- Gift cards(if appropriate);
- Funding all or part of the liaison salary; and
- Transportation costs to and from the school of origin.

5. Serving Preschool-Aged Homeless Children

How many preschool-aged homeless children has the LEA identified in the past school year?

How many preschool-aged homeless children were enrolled in a preschool program during the past school year?

What challenges does the LEA have in serving preschool-aged homeless children?

6. Meeting School Transportation Needs of Homeless Children and Youth

For how many homeless children and youth did the LEA provide transportation to and from the school of origin during the past school year?

During the past school year, what was the excess cost of transporting homeless students to and from their school of origin? Federal guidance states, “The excess cost is the difference between what an LEA normally spends to transport a student to school and the cost of transporting a homeless student to school”.

To what extent is transportation a barrier for preschool-aged homeless children to participate in preschool programs, including remaining in the school of origin?

To what extent is transportation a barrier for homeless students to participate in extracurricular activities?

For each question listed above, determination of the level of need must be established. It should also be determined whether a portion of the Title I, Part A set aside be allocated to that area.

Level of Need:

- ☐ Critical
☐ Moderate
☐ Insignificant

Should a portion of the Title I, Part A set aside be allocated to this area?

☐ Yes
☐ No

If yes, what activities or resources should the Title I, Part A set aside support?

What additional data and programmatic and budgetary information are needed to assist with determining the amount of Title I, Part A homeless set aside that should be allocated to this area?

Next Steps

A discussion of these questions should lead to a more detailed conversation about the actual costs of meeting the needs of homeless students and what amount should be allocated for the Title I, Part A homeless set aside. Local liaisons and Title I coordinators should identify for which areas the LEA's Title I, Part A homeless set aside should be allocated. Note that the U.S. Department of Education has set an expectation that all LEAs with Title I programs should have a homeless set aside even if they do not identify any or many homeless students.

Next steps should include gathering more information to ensure that the amounts allocated to the specific areas align with the costs and expenses for addressing these areas. The result will be a Title I, Part A homeless set aside allocation that enables the LEA to sufficiently meet the needs for identifying and serving homeless students. Moreover, the worksheet can serve as documentation of the process for determining the homeless set aside.