



STATE OF MICHIGAN
DEPARTMENT OF EDUCATION
LANSING


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GOVERNOR

MICHAEL F. RICE, Ph.D.
STATE SUPERINTENDENT

MEMORANDUM

DATE: June 21, 2024

TO: Local Education Agency Homeless Liaisons
NexSys Level 5 Administrators

FROM: Michelle Williams, State Coordinator for Homeless Education 
Office of Educational Supports, MDE

SUBJECT: 2024-25 Title I, Part A Homeless Set Aside

Section 1113(c)(3) of the *Elementary and Secondary Education Act of 1965*, as amended by the Every Student Succeeds Act (ESSA), requires all local educational agencies (LEAs) to reserve funds to ensure comparable services for children and youth experiencing homelessness, and as determined by a needs assessment, reserve funds to provide children and youth experiencing homelessness with services not ordinarily provided to other students, including (but not limited to), funding for a Homeless Education Liaison who has the capacity to carry out the required duties, and funding for transportation related to the school of origin.

LEAs must have a process such as the one described here to budget a sufficient amount of Title I, Part A funding set aside in the Homeless Reservation based on a needs assessment. Last year, in 2023, the Michigan Department of Education's (MDE) Office of Educational Supports (OES) released updated guidance for Title I, Part A Homeless Set Aside that included a [worksheet](#) that supports LEAs to establish local processes for determining needs and considering possible funding sources. OES encourages LEAs to leverage data from their continuous improvement processes, including the Michigan Integrated Continuous Improvement Process (MICIP) to further inform this decision.

The United States Department of Education (USED) has increased guidance related to Title I, Part A Homeless Set Aside, which emphasizes the state's role in defining "sufficiency." In 2024, OES staff, along with external representatives, conducted an analysis of the 2023-24 Consolidated Application's Homeless Set Aside narrative response and budget items. Through the analysis, the team considered the identified needs, budget line items, reported set aside amounts, and counts of identified students experiencing homelessness, as well as how districts reported braiding funds.

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Beginning with the 2024-25 Consolidated Application, LEAs must select one of the following methods of demonstrating sufficiency:

Option A: LEAs whose annual Title I, Part A Homeless Set Aside is greater than \$100 per student experiencing homelessness will continue their current processes and Set Aside amounts. LEAs must continue to reserve at least \$100 per student experiencing homelessness.

Option B: LEAs whose annual Title I, Part A Homeless Set Aside is less than \$100 per student experiencing homelessness will increase to a Set Aside amount of at least \$100 per student experiencing homelessness.

Option C: LEAs who braid funding to meet the needs of students experiencing homelessness will demonstrate sufficiency, in the amount of at least \$100 per student experiencing homelessness, by completing the [Title I, Part A Homeless Set Aside Worksheet](#) provided by OES and attaching it to the Consolidated Application. The worksheet must include an explanation of the needs and the resources utilized to meet those needs.

Option D: LEAs who receive a Title I, Part A allocation of less than \$10,000 will demonstrate sufficiency by completing the [Title I, Part A Homeless Set Aside Worksheet](#) provided by OES and attaching it to the Consolidated Application. The worksheet must include an explanation of the needs and the resources utilized to meet those needs.

In addition to Title I, Part A Homeless Set Aside Worksheet, a stand-alone guidance document has been developed and posted on the Office of Educational Supports' [McKinney-Vento Homeless webpage](#) to assist LEAs in planning and implementing support to meet the needs of students experiencing homelessness.

Lastly, the team also uncovered the four misconceptions related to the Title I, Part A Homeless Set Aside, and provides the following clarifications:

- **Misconception #1:** Title I, Part A Homeless Set Aside, is only required for schools that do not have a school-wide or targeted designation for students experiencing homelessness.

FACT: Title I, Part A Homeless Set Aside is not related to the Title designation of school buildings. In 2016, the language from ESEA, under No Child Left Behind, was amended by ESSA, and the language regarding building-level requirements for non-Title I schools was removed. This means this set-a-side can be utilized anywhere in the district that has a need.

- **Misconception #2:** If a student is receiving Title I support, they do not need to receive additional (Title I, Part A Homeless Set Aside) funding to remove additional barriers.

FACT: Title I, Part A Homeless Set Aside is necessary to remove barriers specifically to students experiencing homelessness, including services in Title I schools, that may not ordinarily be provided to other Title I students ([ESEA Section 1113\(c\)\(3\)\(C\)\(ii\)](#)).

- **Misconception #3:** LEAs should include all Title I services provided to students experiencing homelessness in the Homeless Set Aside amount.

FACT: Title I, Part A Homeless Set Aside reserves funds to provide children and youth experiencing homelessness with services not ordinarily provided to other students, including (but not limited to) funding for a Homeless Education Liaison who has the capacity to carry out the required duties, and funding for transportation related to the school of origin. Title I services provided to students as part of a multitiered system of supports or through the rank-and-serve process are not included in the Homeless Set Aside planning.

- *Misconception #4:* The Homeless Liaison position, if funded from Title I, Part A Homeless Set Aside, **is** included in the calculation of Title I, Part A administrative costs and subject to the administrative cap.

FACT: The Homeless Liaison is supporting the program and is not responsible for the administration of the Title I, Part A grant. Therefore, it would **not** be an administrative cost included in the calculation for administration. The Homeless Liaison is a required role in the ESSA and is specifically named in the section of law related to the Homeless Set Aside. The role is unique and not considered an ordinary service provided to other students. Resource: [Local Homeless Education Liaisons: Making the Right Selection and Supporting Their Effectiveness](#).

- ✓ The primary purpose of the role is to provide support to students and families experiencing homelessness. As such, the LEA should carefully select the individual who has the knowledge, skills, and capacity to fulfill the required duties and the interpersonal skills necessary to establish trust, build relationships, and provide support through a trauma-informed perspective. Counselors, social workers, family liaisons, and those with similar backgrounds may be best positioned to support families in the homeless liaison role.
- ✓ Under McKinney-Vento Act, Subtitle VII-B of the McKinney-Vento Act as amended by the ESSA, "(ii) *The local educational agencies will designate an appropriate staff person, able to carry out the duties described in paragraph (6)(A), who may also be a coordinator for other Federal programs, as a local educational agency liaison for homeless children and youths*" (Section 722(g)(1)(J)(ii)). The 10 duties are included in this publication: [Local Homeless Education Liaisons: Understanding Their Role](#).

Any additional questions or concerns may be directed to Irma Lopez-Barajas, McKinney-Vento Education Consultant, at 517-241-6976 or McKinney-Vento@michigan.gov.