

Michigan Department of Education
Office of Educational Supports (OES)
Guidance on Title I, Part A Homeless Set Aside

2024

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Introduction

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 determine the amount of Title I, Part A funding set aside in the Homeless Reservation based on a needs assessment. In 2023, OES released updated guidance for the 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. The Office of Educational Supports (OES) encourages LEAs to leverage their continuous improvement processes, including Michigan Integrated Continuous Improvement Process (MICIP).

The United States' Department of Education has increased guidance related to the Title I, Part A Homeless Set Aside that emphasizes state's role in defining "sufficiency". In 2024, OES staff, along with external representatives, conducted an analysis of the 2023-24 Consolidated Application 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.

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 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 explanation of the needs and the resources utilized to meet those needs.

LEA Process for Determining Appropriate Title I, Part A Homeless Set Asides

Step 1: The Title I Coordinator meets with the LEA McKinney-Vento (MV) Homeless Education Liaison and, if possible, the MV Regional Grant Coordinator to assess and discuss the specific needs of the LEA's students experiencing homelessness. Additional members may be included in this LEA team.

Step 2: The LEA team:

- Uses the data collected (by/from Homeless Education Liaisons and Grant Coordinators) to list and then prioritize the needs of children and youth experiencing homelessness
- Includes data relative to the needs of children and youth experiencing homelessness in the LEA's comprehensive needs assessment (CNA)

Step 3: The LEA team determines which of the identified needs the LEA will prioritize with funding through Title I, Part A Homeless Set Aside. LEAs will consider other available funding sources before leveraging the Title I, Part A Homeless Set Aside. The LEA will also coordinate with other community, local, state, or federal funds and resources, including the MV Regional Grant Consortium Projects. (See pages 2-4 below. LEAs will collaborate with the MV Grant Coordinator if they participate in a consortium project.)

Step 4: The LEA team develops strategies, activities, and related services to address the identified and prioritized needs.

Step 5: The strategies and activities will then be included in the LEA's continuous improvement plan in the platform for Michigan's Integrated Continuous Improvement Process (MICIP).

Step 6: Funds to support the specific services will be budgeted within the Consolidated Application Title I, Part A District Budget Detail for the year.

The funds reserved for services for students experiencing homelessness and costs for the Homeless Education Liaison are entered in the "Reservations Table" in the Title I School Selection Application in NexSys. This information is part of the Consolidated Application.

Data Considerations

LEAs will use data reported in MSDS to reflect on the identification of students experiencing homelessness and mischooldata.org to reflect on achievement outcomes for students experiencing homelessness. LEAs may compare identification rates to national or state averages.

National averages are provided below. LEAs may use the comparison point of all students for the grade level when considering achievement data.

As a point of comparison, LEAs may use either of the following formulas when evaluating outreach and identification efforts:

- **5.5% of the LEA's Free & Reduced Lunch counts (FRL)**
- **2.5% of the LEA's full enrollment**

These formulas will also assist the LEA if the LEA has not identified any students experiencing homelessness and has a zero count. With this point of comparison, LEAs will consider the following questions:

- What does housing instability look like for students in our community?
- Which community agencies can we partner with to deepen our understanding of homelessness in our area?
- What insights can we learn from the district's Homeless Education Liaison, the MV Regional Grant Coordinator, and other consortium member districts?
- What is the root cause of the lack of identification?

MICIP Connections

This process aligns with MICIP and will assist the LEA in identifying areas of improvement related to outreach, identification, and the provision of support to students experiencing homelessness. The OES team supporting the work of the State Coordinator for Homeless Education as well as the MV Regional Grant Coordinators will be helpful in supporting both the process for determining the Title I, Part A Homeless Set Aside and the integration of homeless considerations in MICIP.

Possible Misconceptions

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

FACT: The 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 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: The 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: The 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 not responsible for the administration of the Title I, Part A grant. Therefore, it would **not** be an administrative cost included in calculation for administration. The Homeless Liaison is a required role in the ESSA and 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.](#)

Activities & Expenditures for Students Experiencing Homelessness

Title I, Part A Homeless Set Aside is an LEA-level reservation. Funds may be used to support any student identified as experiencing homelessness within the LEA, regardless of the Title designation of the school they attend. The Important Notes column provides additional suggestions for obtaining resources before turning to funds in the Title I, Part A Homeless Set Aside.

Identified Need	Important Notes on Services Listed
Items of clothing, particularly if necessary to meet a school's dress or uniform requirement	Many times, clothing needs can be met through other local charities such as vouchers for local thrift shops, gift cards to local merchants, clothing closets, etc. Underwear and socks may be provided through local donations or drives.
Clothing and shoes necessary to participate in physical education classes	See above.
Student fees that are necessary to participate in the general education program	Consider what resources or funds are used for other students who may be identified as economically disadvantaged. Students experiencing homelessness will be eligible for these supports before the Title I, Part A Homeless Set Aside is considered.
Personal school supplies such as backpacks and notebooks	Often these resources can be procured by local donations or drives.

Identified Need	Important Notes on Services Listed
Birth certificates necessary to enroll in school	<p>Birth certificates typically cost \$50-70 or more if from a state outside of Michigan.</p> <p>The Michigan Department of Health and Human Services (MDHHS) has a Vital Documents Program and may have funds available to support the request. Information can be found at: Resources for Providers (michigan.gov) or contact MDHHS-Homeless@michigan.gov and ask for assistance with vital documents.</p>
Immunizations	<p>Students experiencing homelessness are likely eligible for free immunizations through the health department. Contact your local health department for additional information. Costs associated with transportation to and from the health department may be an allowable expense.</p>
Food	<p>This refers to emergency food supplies beyond what is provided by school meals or snacks. For example, weekend food backpacks, items that require no cooking for those in motels without facilities, etc.</p> <p>Seek assistance from local food pantries or churches that may be operating programs to assist students.</p>
Medical and dental services	<p>Local health departments may have referrals for these services at reduced or no cost to students experiencing homelessness. Consult these agencies before using the Title I, Part A Homeless Set Aside.</p>
Eyeglasses and hearing aids	<p>Local health departments may have referrals for these services at reduced or no cost to students experiencing homelessness. Consult these agencies before using the Title I, Part A Homeless Set Aside.</p>
Counseling services to address anxiety related to homelessness that is impeding learning *	<p>Local health / mental health departments may have referrals for these services at reduced or no cost to students experiencing homelessness. Consult these agencies before using the Title I, Part A Homeless Set Aside.</p>
Outreach services to students living in shelters, motels, and other temporary residences	<p>Such services may be coordinated with through the work of the MV Regional Grant Project. The LEA Homeless Education Liaison will collaborate and coordinate with the MV Regional Grant Coordinator.</p>
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 *	<p>This is a primary purpose of the Title I, Part A Homeless Set Aside. LEAs will consider the academic needs of students experiencing homelessness who need additional learning opportunities to meet grade-level standards or State proficiency levels.</p>
Tutoring services, especially in shelters or other locations where students experiencing homelessness live *	<p>This is a primary purpose of the Title I, Part A Homeless Set Aside. LEAs will consider the academic needs of students experiencing homelessness who need additional learning opportunities to meet grade-level standards or State proficiency levels.</p>

Identified Need	Important Notes on Services Listed
Parental involvement specifically oriented to reaching out to parents of students experiencing homelessness *	Parents of children and youth experiencing homelessness must be included in all activities and meetings for Title I parents. The Homeless Education Liaison will provide targeted outreach to these families.
Fees for AP and IB testing	Not likely to find other sources to support these.
Fees for college entrance exams such as SAT or ACT	Not likely to find other sources to support these, although some colleges may waive fees for students experiencing homelessness.
GED testing for school-age students	As appropriate and requested by older youth experiencing homelessness, this option, as well as arranging virtual courses through the LEA, would be available through Title I funds.

* In LEAs with all Title I Schools, some services for children and youth experiencing homelessness may be provided as part of the regularly budgeted Title I program. Children and youth experiencing homelessness are categorically eligible for such services. LEAs are not required to fund such services when provided to children and youth through their reservation if the existing services meet the needs of the children and youth experiencing homelessness. However, LEAs must still reserve funds for other services not ordinarily provided to other Title I students.

USED Guidance on MV Homeless Education

[2020 Dear Colleague Letter for Title I, Part A Homeless Set Aside](#)

Note: "Homeless students" is replaced with "students experiencing homelessness" throughout the guidance.

[Questions M-4 through M-6 of ED's March 2017 EHCY ESSA Guidance](#)

Title I, Part A funds may be used to provide a wide variety of services to students experiencing homelessness. In addition to providing services to assist students experiencing homelessness in meeting the State's challenging academic standards, Title I, Part A funds may be used to provide services to children and youths experiencing homelessness, 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 students experiencing homelessness 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 students experiencing homelessness live
- parental involvement specifically oriented to reaching out to parents of students experiencing homelessness
- fees for AP and IB testing
- fees for college entrance exams such as SAT or ACT
- GED testing for school-age students

Two principles govern the use of Title I, Part A funds to provide such services to students experiencing homelessness. First, the services must be reasonable and necessary to assist students experiencing homelessness 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 students who are economically disadvantaged generally. (See ESEA Section 1115(e)(2))