

Michigan Department of Education – Office of Educational Supports (OES)

Guidance on Title I, Part A Homeless Set Aside

2023

Section 1113(c)(3) of the *Elementary and Secondary Education Act of 1965* (ESEA), 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. Office of Educational Supports encourages LEAs to leverage their continuous improvement processes, including Michigan Integrated Continuous Improvement Process (MICIP).

LEA Process for Determining Appropriate Title I, Part A Homeless Set Aside Reservation for Services for Students Experiencing Homelessness

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.

Samples of Allowable Activities / Expenditures for Students Experiencing Homelessness – from the Local Educational Agency (LEA) Title I, Part A Homeless Set Aside

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
<ul style="list-style-type: none"> • Items of clothing, particularly if necessary to meet a school’s dress or uniform requirement 	<p>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.</p>
<ul style="list-style-type: none"> • Clothing and shoes necessary to participate in physical education classes 	<p>See above.</p>
<ul style="list-style-type: none"> • Student fees that are necessary to participate in the general education program 	<p>Consider what resources or funds are used for other students who may be identified as economically disadvantaged. Often students experiencing homelessness will be eligible for these supports before the Title I, Part A Homeless Set Aside is considered.</p>
<ul style="list-style-type: none"> • Personal school supplies such as backpacks and notebooks 	<p>Often these resources can be procured by local donations or drives.</p>
<ul style="list-style-type: none"> • Birth certificates necessary to enroll in school 	<p>Birth certificates typically cost \$50-70 or more if from a state outside of Michigan. The Michigan Department of Health and Human Services (MDHHS) has a Vital Documents Program and may have funds available to support the request. Contact MDHHS-Homeless@michigan.gov and ask for assistance with vital documents.</p>
<ul style="list-style-type: none"> • 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>
<ul style="list-style-type: none"> • 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. Seek assistance from local food pantries or churches that may be operating programs to assist students.</p>

Identified Need	Important Notes on Services Listed
<ul style="list-style-type: none"> • 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>
<ul style="list-style-type: none"> • 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>
<ul style="list-style-type: none"> • 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>
<ul style="list-style-type: none"> • 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>
<ul style="list-style-type: none"> • 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>
<ul style="list-style-type: none"> • 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>
<ul style="list-style-type: none"> • Parental involvement specifically oriented to reaching out to parents of students experiencing homelessness * 	<p>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.</p>
<ul style="list-style-type: none"> • Fees for AP and IB testing 	<p>Not likely to find other sources to support these.</p>
<ul style="list-style-type: none"> • Fees for college entrance exams such as SAT or ACT 	<p>Not likely to find other sources to support these, although some colleges may waive fees for students experiencing homelessness.</p>
<ul style="list-style-type: none"> • GED testing for school-age students 	<p>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.</p>

* 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 (Section M, Item 4):

- *Note: "Homeless students" is replaced with "students experiencing homelessness" throughout the 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))