

Issue Date: April 11, 2024

Title IA Homeless Set-Aside

Background

The Elementary and Secondary Education Act (ESEA) requires local educational agencies (LEA) to reserve sufficient Title I, Part A funds to provide educationally related support services to children and youth experiencing homelessness. These set aside funds are intended to ensure students experiencing homelessness receive services comparable to those provided to children attending schools served with Title IA funds (ESEA §1113(c)(3)(A)(i)). In addition, these funds may be used to provide children and youth experiencing homelessness with services not ordinarily provided to other students (ESEA §1113(c)(3)(C)(ii)).

Children and youth experiencing homelessness are categorically eligible for services under Title IA, whether or not they live in a Title I school attendance area or meet the academic standards required of other children for eligibility (ESEA § 1115(c)(2)(E)). The required Title IA Homeless Reservation also applies when all schools in an LEA are Title I schools (including Title I schoolwide schools) and when an LEA has a mix of both Title I schools and non-Title I schools.

Determining Title IA Homeless Set Aside Amount

Federal laws do not address a specific amount of funding to set aside; however, LEAs must ensure that the Title IA Homeless Set Aside is sufficient to address the needs of students experiencing homelessness in the LEA. The reservation amount must be based on the total Title IA allocation received by the LEA, before any other set asides or transfers have been made (ESEA §1113(B)).

In Vermont, all LEAs are required to set aside a minimum of \$500 in Title IA Homeless Reservation funds in the Consolidated Federal Program (CFP) application.

Consult with McKinney-Vento Program Staff

When completing the CFP Application, CFP Team Leaders and/or grants managers must consult with the LEA's local homeless/McKinney-Vento liaison to review the needs of students experiencing homelessness in the LEA and determine an appropriate amount of Title IA Homeless Set Aside funds to reserve in the CFP Application.

Consider Data Regarding Students Experiencing Homelessness

LEAs support sufficiency of the proposed set aside amount through submission of the CFP Data Inventory, which is a required upload for all CFP Applications. In the "Needs of Students Experiencing Homelessness"



section of the Data Inventory, LEAs should provide information that includes, but is not limited to:

- The number of homeless children and youth identified in the LEA
- The proposed total amount of Title IA set aside
- A proposed per pupil amount
- A description of the data-supported needs of children and youth experiencing homelessness, which may include prior year spending, activities implemented, and educationally related data such as graduation rates, academic proficiency, chronic absenteeism rates, behavior and/or discipline data, etc.
- Other resources within the LEA/schools and local community that are used to support students experiencing homelessness
- Individuals (positions) within the LEAs who were consulted in determining the set aside amount

General Considerations

- An LEA may use a districtwide per-pupil amount for McKinney-Vento eligible students if this approach yields a sufficient reservation amount for the LEA to meet program requirements.
- An LEA should be prepared to describe the additional resources and funding that will be used to support students experiencing homelessness, particularly if the LEA is setting aside the minimum reservation amount (\$500) and/or if the per pupil amount appears low.
- An LEA should not plan to reserve the same amount of Title IA funds over multiple years without reviewing trends in identified student numbers, services provided, prior year spending, effectiveness of activities, and other funding sources that may be leveraged.

State-Level Coordination

The Vermont Agency of Education's CFP Team is committed to supporting LEAs in implementing these changes consistent with the ESEA and guidance from USED's Education for Homeless Children and Youth (EHCY) Program.

During the CFP Application review, the State Coordinator for the Vermont EHCY Program will collaborate with the Title IA Director to review Title IA Homeless Set Aside amounts, as well as the Data Inventory section that includes the needs of children and youth experiencing homelessness within the LEA.

If the Title IA Director or State Coordinator determine that the amount set aside is insufficient based on the description of needs, there is limited or no description of needs within the LEA, or there is insufficient evidence that the liaison was consulted on the needs of homeless children or youth in the LEA, the State Coordinator and Title IA Director will collaborate on feedback to be included in the CFP Application when it is returned to the LEA. Feedback regarding the Title IA Homeless Set Aside will be provided by the Title IA Director in the application.

Allowable Uses of the Title IA Homeless Set Aside

In addition to providing services to assist students experiencing homelessness in meeting the State's challenging academic standards, Title IA funds may be used to provide services to children and youth experiencing homelessness that may not ordinarily be provided to other (housed) students. Uses of funds can include a local homeless liaison's salary, excess school of origin transportation, and, when reasonable and necessary, a wide variety of other services to allow children and youth experiencing homelessness to attend and fully participate in school.

Title IA funds must only be used as a last resort when funds or services are not available from other public or private sources. Other sources may include, but are not limited to, the USDA's National School Lunch Program and Breakfast Program, public health clinics, or local discretionary funds that may be used to provide similar services for economically disadvantaged students.

To help students experiencing homelessness effectively take advantage of educational opportunities, an LEA may use Title IA funds to provide, where reasonable and necessary, items or services including:

- 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 homeless students live
- Parental involvement specifically oriented to reaching out to parents of homeless students
- Fees for AP and IB testing
- Fees for college entrance exams such as SAT or ACT
- GED testing for school-age students

*Consider whether all other local resources (local discretionary funding, community-based organizations, Community Action Agencies, donations, etc. have been exhausted before utilizing Title IA funds.