

Michigan Department of Education – Office of Field Services
Guidance on Title I, Part A Reservations for Services for Homeless Students

Section 1113(c)(3) of Elementary and Secondary Education Act (ESEA), as amended by Every Student Succeeds Act (ESSA), requires **all** local educational agencies (LEAs) to reserve funds to provide services for homeless children and youth. The amount of funds to be reserved shall be determined based on a needs assessment of homeless children and youth within the LEA as outlined below.

**LEA PROCESS FOR DETERMINING APPROPRIATE TITLE I, PART A
RESERVATIONS FOR SERVICES FOR HOMELESS STUDENTS**

- Step 1:** Title I Coordinator should meet with LEA McKinney-Vento (M-V) Homeless Education Liaison (and if possible the Regional M-V Grant Coordinator) to assess and discuss the specific needs of the LEA's own homeless students.
- Step 2:** This team should:
- Use the data collected (by/from M-V Liaison and Grant Coordinator) to list and then prioritize these needs.
 - Include data relative to the needs of homeless children and youth in the districts comprehensive needs analysis.
- Step 3:** Determine which of these needs the LEA can/will meet THAT ARE NOT AVAILABLE THROUGH OTHER FEDERAL/STATE/COMMUNITY RESOURCES. (You will need the M-V Grant Coordinator's input on this.)
- Step 4:** Next, the team should develop strategies and activities for the selected needs and related services to meet these needs.
- Step 5:** The strategies and activities should then be added to the District Improvement Plan for the (ESSA-mandated) Homeless Subgroup.
- Step 7:** Funds to support the specific services should be budgeted within the Consolidated Application Title I, Part A District Budget Detail and of the funds reserved should be entered on the Program Information screen for **Title I, Part A Assurances and Reservations for Services for Homeless Students.**
- Step 6:** This team should meet at least quarterly to review academic progress of homeless students, determine whether the services provided are actually meeting homeless students' needs and improving academic outcomes, then update the District's Plan as necessary.
- NOTE:** **The United States Department of Education (USED) has advised that a district can anticipate the expected number of homeless students it may have in a given school year by taking a minimum of 10% of its total Free & Reduced Lunch count (FRL). (USED recommends using 20% of FRL in high poverty LEAs.)**

IF THE LEA HAS ZERO HOMELESS STUDENTS, this process should indicate whether the LEA's outreach and identification processes are adequate for compliance with the M-V Act. The Regional M-V Monitors and M-V Grant Coordinators can be very helpful in supporting districts in this area.

**SAMPLES OF ALLOWABLE ACTIVITIES/EXPENDITURES FOR HOMELESS STUDENTS
FROM THE LEA TITLE I, PART A RESERVATIONS FOR SERVICES FOR HOMELESS STUDENTS**

LEAs WITH ALL TITLE I SCHOOLS*	LEAs WITH NON-TITLE I SCHOOLS	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; 	<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 the MV grant – vouchers for local thrift shops, gift cards to local merchants, clothing closets, etc. Underwear and socks are typically provided by the MV grant and local donations or drives.</p>
<ul style="list-style-type: none"> • Clothing and shoes necessary to participate in physical education classes; 	<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; 	<ul style="list-style-type: none"> • Student fees that are necessary to participate in the general education program; 	<p>Not likely to find other sources to support these.</p>
<ul style="list-style-type: none"> • Personal school supplies such as backpacks and notebooks; 	<ul style="list-style-type: none"> • Personal school supplies such as backpacks and notebooks; 	<p>Most times, these are provided by the MV grant and local donations or drives.</p>
<ul style="list-style-type: none"> • Birth certificates necessary to enroll in school; 	<ul style="list-style-type: none"> • Birth certificates necessary to enroll in school; 	<p>Birth certificates typically cost \$10-20, more if from states outside of Michigan.</p>
<ul style="list-style-type: none"> • Immunizations; 	<ul style="list-style-type: none"> • Immunizations; 	<p>Homeless students should be able to get most immunizations for free from the local Health Department.</p>
<ul style="list-style-type: none"> • Food; 	<ul style="list-style-type: none"> • Food; 	<p>This refers to emergency food supplies OUTSIDE OF SCHOOL MEALS/SNACKS. For example, weekend food backpacks, items that require no cooking for those in motels w/o facilities, etc. Typically, these can be provided by the MV grant through arrangements with local food pantries or churches.</p>
<ul style="list-style-type: none"> • Medical and dental services; 	<ul style="list-style-type: none"> • Medical and dental services; 	<p>Many local health departments have referrals for these services at no cost to homeless students.</p>
<ul style="list-style-type: none"> • Eyeglasses and hearing aids; 	<ul style="list-style-type: none"> • Eyeglasses and hearing aids; 	<p>Many local health departments have referrals for these services at no cost to homeless students.</p>
<ul style="list-style-type: none"> • Eyeglasses and hearing aids; 	<ul style="list-style-type: none"> • Eyeglasses and hearing aids; 	<p>Many local health departments have referrals for these services at no cost to homeless students.</p>
LEAs WITH ALL TITLE I SCHOOLS	LEAs WITH NON-TITLE I SCHOOLS	IMPORTANT NOTES ON SERVICES LISTED

<ul style="list-style-type: none"> • Counseling services to address anxiety related to homelessness that is impeding learning; * 	<ul style="list-style-type: none"> • Counseling services to address anxiety related to homelessness that is impeding learning; 	<p>Many local health/mental health departments have referrals for these services at no cost to homeless students.</p>
<ul style="list-style-type: none"> • Outreach services to students living in shelters, motels, and other temporary residences; 	<ul style="list-style-type: none"> • Outreach services to students living in shelters, motels, and other temporary residences; 	<p>Such services are typically available through the regional MV 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; * 	<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>IT IS CRITICAL FOR TITLE I TO PROVIDE THESE ACADEMIC SERVICES; REQUIRED for homeless students not meeting grade-level standards or state proficiency levels.</p>
<ul style="list-style-type: none"> • Tutoring services, especially in shelters or other locations where homeless students live; * 	<ul style="list-style-type: none"> • Tutoring services, especially in shelters or other locations where homeless students live; 	<p>IT IS CRITICAL FOR TITLE I TO PROVIDE THESE ACADEMIC SERVICES; REQUIRED for homeless students not meeting grade-level standards or state proficiency levels.</p>
<ul style="list-style-type: none"> • Parental involvement specifically oriented to reaching out to parents of homeless students; * 	<ul style="list-style-type: none"> • Parental involvement specifically oriented to reaching out to parents of homeless students; 	<p>Parents of homeless children and youth MUST be included in all activities and meetings for Title I parents. MV Liaison should do targeted outreach to these families.</p>
<ul style="list-style-type: none"> • Fees for AP and IB testing; 	<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; and 	<ul style="list-style-type: none"> • Fees for college entrance exams such as SAT or ACT; and 	<p>Not likely to find other sources to support these, although some colleges may waive fees for homeless students.</p>
<ul style="list-style-type: none"> • GED testing for school-age students. 	<ul style="list-style-type: none"> • GED testing for school-age students. 	<p>As appropriate and requested by older homeless youth, this option, as well as arranging virtual courses through the district, would only be available through Title I funds.</p>

* In LEAs with all Title I Schools, some services for homeless children and youth may be provided as part of the regularly budgeted Title I program. Homeless children and youth are categorically eligible for such services. LEAs are not required to fund such services when provided to homeless children and youth through their homeless reservation if the existing services meet the needs of the homeless children and youth, however, they 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):

Title I, Part A funds may be used to provide a wide variety of services to homeless students. In addition to providing services to assist homeless students in meeting the State's challenging academic standards, Title I, Part A funds may be used to provide services to homeless children and youths, 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 homeless students 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 XXXXX 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; and
- GED testing for school-age students.

Two principles govern the use of Title I, Part A funds to provide such services to homeless students.

First, the services must be reasonable and necessary to assist homeless students 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 economically disadvantaged students generally.

(See ESEA section 1115(e)(2)).