



Illinois State Board of Education

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BULLETIN NO. 01-09 (Updated 5/15)

TO: School District Superintendents
School District Title I, Part A Directors

FROM: Melina Wright, Division Administrator, Title Grants Administration Division

RE: Addressing Homeless Students with McKinney-Vento and Title I Funds

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This e-bulletin is to provide updated information regarding the use of Title funds to provide services to homeless children and youth. Children and youth who are homeless are automatically eligible for Title I, Part A, services, whether or not they reside in a Title I attendance area or meet the academic standards required of other children for eligibility.

According to Title I, Part A, **LEAs must reserve (or set aside) such funds as are necessary to provide comparable services to homeless children who are not attending Title I schools.** [§1113(c)(3).] When determining appropriate expenditures for the funds set aside for homeless students, it is important to note that *comparable* services do not mean services that are necessarily *identical* to other Title I, Part A, services, since LEAs may use reserved funds to provide homeless students with services that are not ordinarily provided to other Title I students and that are not available from other sources. LEAs must establish their own methods for allocating Title I, Part A, set asides for homeless children and youth who are not attending Title I schools. Generally, these methods involve conducting a needs assessment for homeless students in the LEA or basing the set-aside amount on a formula, such as a per pupil expenditure. **Determining an appropriate amount requires coordination between the LEA Title I and homeless education programs.**

There are four common methods which can be used to calculate Title I set-asides:

1. Identify homeless students' needs, and fund accordingly;
2. Obtain count of homeless students, and multiply by Title I, Part A per-pupil allocation;
3. Reserve an amount of funds greater than or equal to the amount of your McKinney-Vento sub grant request, or
4. Reserve a specific percentage based on your district's poverty level or total Title I, Part A allocation.

An LEA's Title I, Part A reservation is used to ensure that all homeless children and youth have equal access to the same free, appropriate public education, including a public preschool education, as provided to other children and youth. (20 USC §6313(c)(3)(A); PL 107-110, §1113(c)(3)(A)). Homeless students who attend Title I schoolwide or targeted assistance schools may have unique challenges that are not addressed by the regular Title I program at these schools. Guidance from the U.S. Department of Education states that LEAs may use

reserved funds to provide homeless students with services that are not ordinarily provided to other Title I students and that are not available from other sources.

After assessing the needs of homeless students, the homeless education program and Title I program staff, along with other district-level administrators, may consider funding the following:

- Before-school, after-school, and/or summer programs,
- Outreach services to students living in shelters, motels, and other temporary residences to help identify homeless children and youth and advise them of available school programming,
- Basic needs such as clothing, uniforms, school supplies, and health-related needs,
- Counseling services,
- The hiring of teachers, aides, and tutors to provide supplemental instruction to students whose achievement is below grade level,
- Parental involvement programs that make a special effort to reach out to parents in homeless situations,
- Research-based programs that benefit highly mobile students,
- Data collection to assess the needs and progress of homeless and other highly mobile students,
- Salary of the local homeless education liaison, and
- School of-origin transportation for homeless children and youth. (*See sixth reference below*).

In order to determine how much of the Title I, Part A funds to set-aside, an LEA must understand which students are homeless. These students are often difficult to identify for many reasons and often go unnoticed by school personnel. Students and parents may try to hide their situation because they are embarrassed by their homelessness. In addition, the fear of having children taken away often prevents families from informing school officials of their living circumstances. Unaccompanied youth may not report their homeless status for fear of being returned to unsafe family environments. Children and youth who are not enrolled in school and who are not living in shelters are even more invisible to schools and their communities.

The McKinney-Vento Act (Section 725) defines homeless children and youth as:

- Children and youth who lack a fixed, regular, and adequate nighttime residence, including children and youth who are:
 - Sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason.
 - Living in motels, hotels, trailer parks, or camping grounds due to lack of alternative adequate accommodations.
 - Living in emergency or transitional shelters.
 - Abandoned in hospitals.
 - Awaiting foster care placement.
- Children and youth who have a primary nighttime residence that is a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.
- Children and youth who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings.
- Migratory children who qualify as homeless because they are living in circumstances described above.

- The term *unaccompanied youth* includes a youth not in the physical custody of a parent or guardian. This would include runaways living in runaway shelters, abandoned buildings, cars, on the streets, or in other inadequate housing; children and youth denied housing by their families (sometimes referred to “throwaway children and youth”); and school-age unwed mothers living in homes for unwed mothers because they have no other housing available.
- Pre-school children, migrant children, and youth whose parents will not permit them to live at home or who have run away from home (even if their parents are willing to have them return home) may also be identified as homeless.

The changing character of homelessness means that children and youth in homeless situations often do not fit society’s stereotypical images. Most students share housing with friends or relatives or stay in motels or other temporary facilities. Yet, these children and youth may not immediately be considered homeless and are sometimes denied the protections and services of the McKinney-Vento Act. Therefore, the Act now contains a specific definition of homelessness that includes a broad array of inadequate living situations. This definition can help educators and families understand who is entitled to the Act’s protections.

As stated previously, four methods are often used to calculate the Title I, Part A Homeless set-aside. One method is to identify homeless students’ needs, and fund accordingly. A district can determine the services needed and reserve that amount of Title I, Part A funds to pay for such services, by reviewing how much it cost in previous years to fulfill the requirements set out in Section 722(g)(6) of McKinney-Vento. Alternatively, an LEA can obtain count of homeless students, and multiply by Title I, Part A per-pupil allocation. In situations where historical costs for services are not available, an LEA can use a formula to calculate the set-aside. This can be done with a thorough count of homeless students in the district and multiply the number of homeless students by the district’s Title I, Part A allocation. Districts that apply for a McKinney-Vento sub grant may consider matching that grant request with the Title I set-aside. Lastly, an LEA could reserve a specific percentage of the total Title I, Part A allocation to comply with the requirements of §1113(c)(3)(A), but since the percentage may be arbitrary, the LEA should review comparison data to ensure the set-aside is appropriate. These are discussed in more detail in the second reference listed below.

Resources and References:

- 1) U.S. Department of Education Guidance for the Education for Homeless Children and Youth Program (Updated July 2004)
<http://www.ed.gov/programs/homeless/guidance.doc>
- 2) *Four Methods for Determining New Mandatory Title I, Part A Set-Aside for Homeless Children* - discusses the issue of how to calculate the Title I set-aside for homeless students required under the No Child Left Behind Act. Four specific calculation methods are presented. http://srvlive.serve.org/nche/downloads/calculating_setasides.pdf
- 3) *Homeless Education and Title I: Collaboration and Compliance* - presentation explains the relationship between the McKinney-Vento Homeless Assistance Act and Title I of the No Child Left Behind Act. Concepts covered include comparable services, the mandatory reservation of funds set-aside, and strategies for collaboration between the programs. http://center.serve.org/nche/downloads/breeze/titlei_summary.pdf
- 4) *Title I brief* - identifies the key provisions of the McKinney-Vento Homeless Assistance Act dealing with the provision of services to homeless children and youth under Title I, Part A, and offers strategies for implementation.
<http://srvlive.serve.org/nche/downloads/briefs/titlei.pdf>

- 5) ISBE's compilation of resources <http://www.isbe.net/homeless/default.htm>
- 6) Consolidated and Further Continuing Appropriations Act, 2015 (H.R. 83), the omnibus funding bill for FY2015 signed by President Obama on December 16, 2014. The Act, which governs the usage of FY2015 funds, and carryover funds from fiscal years 2013 and 2014, reauthorizes the authority for Title I, Part A funds to be used *to pay for the salary of the local homeless education liaison and school of-origin transportation for homeless children and youth* that was first authorized under the Consolidated Appropriations Act of 2014.