

Q&A Title I and Services to Homeless: Coordination Between Title I Legislation and McKinney-Vento

Michigan Department of Education Office of Field Services

Purpose Statement: This Question and Answer (Q&A) document provides clarification of the Title I, Part A requirements for support to the children and youth experiencing homelessness. Information in this document also serves to assist districts in implementing required coordination efforts between Title I and McKinney-Vento legislation.

Q1. How does a district define a homeless student?

A1. The district must use the definition of homeless as found in the McKinney-Vento legislation.

For purposes of this subtitle:

- (1) The terms 'enroll' and 'enrollment' include attending classes and participating fully in school activities.
- (2) The term 'homeless children and youths'--
 - (a) Means individuals who lack a fixed, regular, and adequate nighttime residence (within the meaning of section 103(a) (1)); and
 - (b) Includes:
 - (i) children and youths who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; are abandoned in hospitals; or are awaiting foster care placement;
 - (ii) children and youths 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 (within the meaning of section 103(a)(2)(C));
 - (iii) children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and
 - (iv) migratory children (as such term is defined in section 1309 of the Elementary and Secondary Education Act of 1965) who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (i) through (iii).

[McKinney-Vento Sec. 725(1)(2)]

Q2. When determining the Title I required reservation for homeless students, do districts count only the homeless students in non-Title I schools?

A2. Title I legislation states that a local educational agency (LEA) shall reserve Title I funds as are necessary to provide services to homeless children not attending Title I schools* comparable to those services provided to children attending Title I schools. It is important to remember, however, that all homeless students in Title I schools (targeted assistance as well as schoolwide) are eligible for Title I services. See also Q&A 7 information on “anticipated costs” for homeless students.
[Title I Sec. 1113(c)(3)(A)]

***Note:** There are two exceptions to the rule: 1) districts that are 100 percent Title I do not have to reserve Title I money for homeless students (i.e., single building school districts / Public School Academies (PSAs)); and 2) LEAs with no homeless students are not expected to set aside any Title I funding for the population; however, the district should review identification and outreach procedures for homeless students for McKinney-Vento compliance.
[May 2010 NCLB Advisor and McKinney-Vento Sec. 722 (g)(6)(A) (i) and (v)]

Q3. How does the district determine the appropriate reservation for homeless students attending non-Title I schools?

A3. Even though a district can determine its own formula for calculating the homeless reservation, four methods are available for consideration in collaboration with district homeless liaison or additional stakeholders if Federal program coordinator and homeless liaison is the same person:

- Method 1: Identify homeless students’ academic and/or additional educationally-related needs, and determine a reasonable amount in collaboration with district homeless liaison or additional stakeholders.
- Method 2: Obtain count of homeless students; identify academic needs and/or additional educationally-related needs and multiply by the district’s Title I, Part A per pupil allocation or by the average per pupil allocation.
- Method 3: Reserve an amount of funds greater than or equal to the amount of an LEA’s McKinney-Vento sub-grant total, if applicable.
- Method 4: Reserve a specific percentage based on your district’s poverty level or total Title I, Part A allocation.

Whatever method the district chooses, the Michigan Department of Education (MDE) Office of Field Services (OFS), recommends the following preliminary action steps so that requirements for coordination between Title I McKinney-Vento and Title I are in compliance.

Step 1: Identification of Homeless

The staff person identified by the district as its McKinney-Vento homeless liaison must follow the McKinney-Vento legislation Sec. 722(g)(6) to identify the homeless students and as described in Q&A 1. The identification process consists of identification through school personnel and through coordination activities with other entities and agencies.

Step 2: Needs Assessment Analysis

Based on the district's comprehensive needs assessment (CNA), the data related to homeless needs (academic, pupil support services, and non-academic) are analyzed. The district's homeless liaison should participate in the data analysis along with other stakeholders involved in the CNA process.

Step 3: Comparable Services as a Basis for Homeless Reservation

The reservation for homeless students attending non-Title I schools must first, be based on the identified services provided to ALL Title I students and second, may also be based on additional services for homeless not typically offered to all Title I students. "Comparable services" for homeless students attending non-Title I schools are then based on how the district chooses to provide services in its Title I schools.

Example 1. If a district provides only academic support to its Title I students, and chooses not to include additional services for homeless students in its Title I schools because those services are available from funding sources other than Title I, then "comparable services" for homeless students attending non-Title schools are limited only to academic support.

Example 2. If a district chooses to not only provide academic support for its Title I students but also provides additional services (from Title I) for homeless students not typically offered to all Title I students, then the combination of services is defined as, "comparable services." If a district does choose to include additional services from Title I for homeless students as part of its "comparable services," the following information must first be considered:

Additional Title I costs not typically offered to all Title I students may only be considered after it has been determined that available resources from the following options have been exhausted:

- (A) District policies that address the availability of funding miscellaneous expenses for ALL students with extenuating financial circumstances (Title and non-Title students)**;
- (B) Availability of funds through a regional McKinney-Vento grant, and
- (C) Availability of community and private resources.

If all options for funding are exhausted, then the district makes a determination of what additional services for homeless students could be funded from Title I, based on the size of the Title I allocation and the Federal requirement of "reasonable and necessary." Documentation must be on file to verify that all means are documented for obtaining non-Title I resources before Title I funds can be expended.

***Note:** It is recommended that the homeless liaison be responsible for coordinating efforts to obtain non-academic needs for homeless students not typically offered to all Title I students (this may be done in consultation with a regional McKinney-Vento Grant Coordinator). The homeless liaison should be prepared to discuss the availability or non-availability of additional resources for homeless students so that "comparable services" between students served in Title I schools and homeless students served in non-Title I schools can be established.

****Alert:** A supplement / supplant question would arise if Step 3, Example 2, Item A costs for homeless students were excluded and funded with Federal funds.

Step 4: Documenting the Reservation Method / Formula

Districts are required to have the homeless formula on file. (See Q&A 3 for list of suggested methods to determine a formula.) Included in the documentation must be a written rationale that supports the method selected to develop the homeless reservation formula.

[Title I Sec. 1113, 1114, 1115 and USED communication to MDE]

Q4. What are allowable Title I costs?

A4. There are two types of allowable costs: 1) Educationally-related services for ALL Title I students, and 2) Educationally-related services **not** typically allowable for ALL Title I students, but in certain circumstances may be allowable for homeless students.

1. Allowable costs for homeless students in non-Title I schools that are generally considered comparable services for ALL Title I students include academic services such as tutoring during the school day, extended day, summer school; transportation costs back home from a Title I funded tutoring program after school.

[Title I Sec. 1115]

Allowable pupil support services include:

- Supplemental social work or counseling services
- Health related services for ALL Title I students may be allowed if funds are not reasonably available from public or private sources. Then, as a last resort, health, nutrition and other social services may be provided such as the provision of basic medical equipment

including eyeglasses and hearing aids, student's school related nutritional needs, immunizations and, dental needs.
[Title I Sec. 1115(e)(2)(A)(B)(i) and communication with USED]

2. Educationally-related services **not** typically allowable for ALL Title I students may be allowable for homeless students to ensure that they can participate in required academic activities are listed below. But before the services / costs are allowable, the following options **must** first be considered AND determined that available resources from these options have been exhausted: (a) District policies that address the availability of funding miscellaneous expenses for ALL students with extenuating financial circumstances (Title and non-Title students); (b) Availability of funds through a regional McKinney-Vento grant and (c) Availability of community and private resources.

- Items of clothing 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
- 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 SAT / ACT testing (third attempt)
- Cost of GED for an unaccompanied youth
- Costs for attaining a GED for parents participating in Head Start or Even Start
- Graduation cap and gown

[McKinney-Vento Guidance and communication with USED]

3. Non-allowable Title I costs:
- Physicals for sports participation
 - Clothing for student's parents
 - Money for housing
 - Prom dress
 - Transportation except as described in response 4(a)1

[McKinney-Vento Guidance and communication with USED]

Q5. Who would be responsible for coordinating and obtaining the educationally-related resources for homeless students not typically allowed for all Title I students?

A5. It is a district decision who would coordinate and obtain these resources for homeless students but it is recommended that the district homeless liaison assume this responsibility as part of the required coordination efforts

between McKinney-Vento and Title I, keeping in mind that the responsibilities of the local liaison include serving as one of the primary contacts between homeless families and school staff, district personnel, shelter workers, and other service providers.

[MDE/OFS decision and McKinney-Vento Guidance]

Q6. Is a homeless reservation required if homeless students in non-Title I schools do not require academic services and additional costs, if applicable, are already funded through district policies, a McKinney-Vento regional grant and/or community and private resources?

A6. Title I legislation and regulations state that the LEA shall reserve funds as reasonable and necessary. If homeless students in non-Title I schools do not require academic services and additional educational needs are obtained through other sources, a reservation is not necessary. The district would need documentation on file as evidence as well as complete the Homeless Template and upload as an attachment to the Consolidated Application.
[MDE decision based on USED communication]

Q7. What if a district does not have homeless students? Does the LEA still have to reserve funds “in anticipation” of a future homeless concern?

A7. An LEA is not required to reserve funds if no homeless students are identified in non-Title I schools. If there is a documented history in the LEA of having provided adequate notice to schools, public service locations, motels, etc., and not having identified homeless students, then one could make the case to the State Education Agency (SEA) for no reservation.
[E-Mail response from USED]

The district must complete and upload the Homeless Template to the Consolidated Application.
[MDE/OFS decision]

An LEA may decide to reserve funds in anticipation of future homeless concerns; however, this must not be a disproportionate amount for this purpose to serve homeless students with Title I comparable services. If the LEA does decide to reserve funds in anticipation of future homeless costs for students attending non-Title I schools, an amendment to the Title I budget in the consolidated application for additional comparable services would be required if the variance to the approved amount of the individual functions exceeded 10% of the total approved amount.

[MDE/OFS decision and prior approval requirements established by EDGAR]

Q8. If a district does set aside a reservation for homeless students attending non-Title I schools, does the reservation have to come from Title I? Could the district use State supplemental funding for academic tutoring?

A8. The statute only addresses “as necessary.”

[USED e-mail response]

- In Michigan, Section 31a or general funds have historically been used for academic support for homeless students in non-Title I schools. Educationally-related non-academic support, if included in “comparable services” would follow district policies that address the availability of funding miscellaneous expenses for ALL students with extenuating financial circumstances (Title and non-Title students); (b) Availability of funds through a regional McKinney-Vento grant and (c) Availability of community and private resources. If the options to fund non-academic services are exhausted, Section 31a could not be used for non-academic support. The district would then provide that portion of its “comparable services” from Title I and place a budget item for those additional services in the Title I budget.
- A funding source other than Title I used for a homeless reservation will be detailed out in the View Comment checklist of the Consolidated Application. The detail will be described in the Homeless Template and will include the name of the funding source, number of homeless to be serviced and the total reservation amount.

[MDE/OFS decision]

Q9. Should the reservation for homeless students remain in the Title I budget for the entire school year? Could a district amend down its reservation at some point in time if the set-aside is not needed? Could a district amend down the reservation to \$0?

A9. As homeless students can be identified throughout the year and not just at one point in time, an LEA would need to take that into consideration. Otherwise, using its own trend data it can amend the reservation, keeping in mind it is still required to provide the comparable services.

[USED e-mail communication]

Q10. Who determines when and how the homeless reservation is expended?

A10. District staff needs to be mindful that an approved Title I homeless reservation in the consolidated application is already detailed as to how the homeless reservation will be expended during the course of the year. However, it is recommended that the district administrator who is responsible for the oversight of the Title I and homeless reservation budget within the Consolidated Application periodically meet with the district homeless liaison throughout the course of the school year to discuss the needs of the homeless as determined by the initial needs assessment and the LEA’s description of comparable services (see Q&A 3 Step 3 to review the process for defining comparable services). It is also recommended that the homeless liaison initiate communication with the administrator responsible for Title I oversight regarding homeless students identified during the school year. The

district administrator responsible for the Title I budget would amend the homeless reservation within the Title I budget, if necessary. Documentation should be maintained for all meeting regarding the coordination of services.
[MDE/OFS decision]

Q11. Who should district staff contact if they have questions regarding allowable costs for homeless students?

A11. District staff with questions regarding allowable costs for homeless students should contact their Regional OFS Consultant for the questions that involve expenditures related to the Consolidated Application budgets: (Title I, Part A; Title I, Part C; Title I, Part D; Title II, Part A; Title III, and Title VI). If the question requires additional information before a response can be formulated, the OFS Consultant will refer the question to OFS management staff.

District staff should direct all other questions regarding their McKinney-Vento responsibilities and costs for homeless students to the McKinney-Vento Regional Grant Coordinator. In the event that the question requires additional information before a response can be formulated, the Regional Grant Coordinator will refer the questions to the MDE Homeless Consultant.
[MDE/OFS decision]

Q12. Is the District required to have a Board Approved Homeless Policy?

A12. MDE/OFS requires that a Board approved Homeless Policy be in place. USED has communicated that LEAs must demonstrate that they have developed, and have reviewed and revised policies to remove barriers to the enrollment and retention of homeless children and youth in schools in the State. It is recommended that districts review the McKinney-Vento homeless legislation [Section 722g(J)(i)] that describes the duties of the homeless liaison and have this description in writing as part of its documentation. If the homeless liaison is fully implementing the duties as described in the legislation, then the barriers to the enrollment and retention of homeless children are diminished. Documentation could include a Board approved homeless policy or administrative procedures, presented and approved by the board describing how the LEA has removed barriers to the enrollment and retention of homeless students.

Q13. Can Title I fund the district homeless liaison position?

A13. Funding the responsibilities of the district's homeless liaison depends on several factors.

1. If the homeless liaison is also the superintendent, superintendent / principal or principal, then this would not be an allowable cost from Title I.
[EDGAR]

2. If the district currently funds a homeless liaison position with general (district) funds or if homeless liaison responsibilities are part of an already existing general (district) funded position, then the district must comply with supplement and not supplant requirements.
3. If the district currently funds a Federal programs coordinator that includes Title I responsibilities or funds (in full or in part) an already existing Title I position such as a social worker / counselor, then those homeless activities that directly relate to Title I could be part of the Title I-funded portion of the salary.

If the district wants to expand the role of the Federal programs coordinator to include oversight of the entire McKinney-Vento legislation, district general funds would support the time and effort for that responsibility. First, coordinate with the Regional McKinney-Vento Grant Coordinator to determine what activities can be provided from the McKinney-Vento grant and what activities would be provided by the district. It is then recommended that the district develop a coordinated description of critical services required for the homeless students and determine if Title I or McKinney-Vento legislation best align for delivery of those services. Allowable uses of appropriate funds should guide the decision making to support those critical services.

Questions related to funding the specific homeless services by the Federal programs coordinator or a Title I funded position (social worker / counselor) in full or in part by Title I should be addressed to the OFS, Regional Services Unit. If necessary, OFS personnel will collaborate with the Homeless Consultant to determine an appropriate response.
[MDE/OFS decision based on McKinney-Vento Sec. 722 (g)(1)(J)(ii)]

Q14. How does a district establish communication and coordination to address the needs of the homeless students as required by Title I and McKinney-Vento?

A14. MDE/OFS recommends that processes and procedures be put in place and documented similar to the processes and procedures required for Private School consultation.

1. The district homeless liaison and the district administrator charged with oversight of Title I work together to analyze the homeless data from the CNA such as academic data, school and community demographic data.
2. Identified needs of homeless students are discussed and agreed upon based upon the action steps listed in Q&A 3.
3. Agreed upon district-wide homeless services are described and articulated as strategies in the District School Improvement Plan (i.e., reference to policies and procedures on homeless, and the Dispute Resolution) and, if

applicable, as instructional strategies in each Title I school's school improvement plan. Coordination of Services is a requirement of the district as well as a required component for both Title I Targeted and Schoolwide school improvement plans. The LEA Planning Cycle Application (LEAPC) should reference strategies to serve homeless students to align with the district level budget item for homeless students or to the homeless rationale for use of non-Title I funds that is entered in the View Comments checklist of the Consolidated Application.

[Title I Sec. 1112(b)(1)(E)(ii)] [Title I Sec. 1114(b)(1)(J)]

[Title I Sec. 1115(c)(1)(H)]

4. Periodic and documented meetings are held throughout the school year between the district homeless liaison and the administrator charged with oversight of Title I* to review and reevaluate the needs of the homeless as described in Q&A 10 and to ensure that compliance is met for homeless requirements in Title I and McKinney-Vento legislation.

***Note:** If the district administrator charged with oversight of Title I and the Homeless liaison are one and the same person, it is recommended that the district include in its documentation the process and procedures of how it will determine other appropriate staff to be included in the coordination and implementation of McKinney Vento and Title I.

5. Contact MDE/OFS for clarification on homeless issues and direct questions to the appropriate staff as indicated in Q&A 11.
[MDE/OFS decision]