



National Center for Homeless Education
Supporting the Education of Children and
Youth Experiencing Homelessness
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McKINNEY-VENTO LAW INTO PRACTICE BRIEF SERIES

Serving Students Experiencing Homelessness under Title I, Part A

This NCHE brief

- examines how Title I, Part A intersects with the McKinney-Vento Homeless Assistance Act regarding serving students experiencing homelessness; and
- offers strategies for collaboration between the Title I, Part A and McKinney-Vento programs for serving students experiencing homelessness.

INTRODUCTION

The purpose of Title I, Part A of the Elementary and Secondary Education Act (ESEA; 20 U.S.C. § 6301 et seq.) is to provide all children with a fair, equitable, and high-quality education, and to close educational achievement gaps. Title I, Part A is designed to meet the educational needs of low-achieving children in schools with the highest levels of poverty by aligning high-quality assessments, systems of accountability, teacher preparation, curriculum, and instructional materials with challenging State academic standards. To support schools in implementing program goals, the Title I, Part A program provides financial assistance to local educational agencies (LEAs, hereafter *school districts*) and schools with high numbers or percentages of children from low-income families.

Subtitle VII-B of the McKinney-Vento Homeless Assistance Act (42 U.S.C. § 11431 et seq.; hereafter *the McKinney-Vento Act*) ensures that children experiencing homelessness have access to the same free, appropriate

McKINNEY-VENTO DEFINITION OF HOMELESS 42 U.S.C. § 11434a(2)

The term “homeless children and youth”—

- A. means individuals who lack a fixed, regular, and adequate nighttime residence...; 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; or are abandoned in hospitals;
 - 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...;
 - 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...who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (i) through (iii).

public education, including a public preschool education, and related services as their permanently housed peers so that they have an equal opportunity to meet the same challenging academic standards. The Act requires State educational agencies (SEAs) and school districts to remove barriers to the identification, enrollment, attendance, and success in school of students experiencing homelessness [42 U.S.C. § 11431(2)]. The Act also emphasizes collaboration and parent participation as critical to the educational success of students experiencing homelessness.

While many challenges faced by students experiencing homelessness are addressed by the McKinney-Vento Act, Title I, Part A also plays a significant role in supporting the academic achievement of these students. Requirements for coordination between the two programs are included in both statutes. Additionally, both Title I, Part A and the McKinney-Vento Act include provisions for grant funds to be distributed by SEAs to school districts for activities aligned with each program's goals as established in Federal legislation, including supporting the educational success of students experiencing homelessness.

This brief explains how Title I, Part A of the ESEA, as amended by the Every Student Succeeds Act of 2015 (ESSA)¹, and the McKinney-Vento Act, as amended by the ESSA, intersect, and offers strategies for effective cross-program collaboration. Briefs on additional homeless education topics are available at <https://nche.ed.gov/briefs.php>.

STATUTORY REQUIREMENTS FOR CROSS-PROGRAM COLLABORATION

To identify and address the needs of students experiencing homelessness more effectively, both the McKinney-Vento Act and Title I, Part A require cross-program coordination. The McKinney-Vento Act requires every school district to appoint a local homeless education liaison (hereafter *local liaison*) to serve as the district's key homeless education contact, and oversee the implementation of the Act in schools throughout the district [42 U.S.C. § 11432(g)(1)(J)(ii)]. As part of their responsibilities, local liaisons must coordinate and collaborate with other school personnel responsible for providing services to students experiencing homelessness

[42 U.S.C. § 11432(g)(6)(C)]. Title I, Part A requires that programs operated under its authority coordinate at the State and local levels. All districts receiving Title I, Part A funds must include in their local plans a description of how the district's Title I, Part A program is coordinated with its McKinney-Vento program [20 U.S.C. § 6312(a)(1)(B)]. The development of the local plan should include timely and meaningful consultation with the local liaison [20 U.S.C. § 6312(a)(1)(A)], and must describe the Title I, Part A services that will be provided to students experiencing homelessness, including through the homeless set-aside (20 U.S.C. § 6312(b)(6)); see [Serving Students Experiencing Homelessness with Set-Aside Funds](#) below for more information).

In addition to meeting each program's statutory requirements, cross-program coordination provides an opportunity to optimize resource allocation. While more than 90% of U.S. school districts receive Title I, Part A allocations (U.S. Government Accountability Office, 2011, p. 4), only 22% of U.S. school districts receive McKinney-Vento subgrant funding (National Center for Homeless Education, 2013, p. 9). In order to meet the needs of all students, including students experiencing homelessness, it is critical that both programs work together to leverage resources to the greatest extent possible.

AUTOMATIC ELIGIBILITY FOR TITLE I, PART A SERVICES

Students experiencing homelessness are part of Title I, Part A's target population of disadvantaged students; however, the high mobility, trauma, and poverty associated with homelessness create unique educational barriers and challenges that Title I, Part A students with fixed, regular, and adequate housing may not face. Homelessness can be associated with lower standardized test scores in reading, spelling, and math (Obradović et al., 2009; Rafferty, Shinn, & Weitzman, 2004). Students experiencing homelessness also transfer schools more often, which requires them to adapt to new curricula, teachers, and peers, while increasing the risk of "broken bonds," all of which impact learning negatively (Cunningham, Harwood, & Hall, 2010; Obradović et al., 2009). Thus, students in homeless situations often require supports beyond what typically may be offered to other students to support their academic success.

¹ Unless otherwise indicated, all references to the ESEA are to the ESEA as amended by the ESSA.

For these reasons, children and youth experiencing homelessness are automatically eligible for Title I, Part A services, whether or not they attend a Title I, Part A school, or meet the academic standards required of other students for eligibility (20 U.S.C. § 6315(c)(2)(E); ED, 2017, p. 39). This automatic eligibility acknowledges that the experience of homelessness puts children and youth at significant risk of academic failure, regardless of their previous academic standing. Additionally, automatic Title I, Part A eligibility allows students in homeless situations who are doing well academically to receive additional non-instructional education-related support services needed to succeed in school.

SERVING STUDENTS EXPERIENCING HOMELESSNESS UNDER SCHOOLWIDE AND TARGETED ASSISTANCE PROGRAMS

Title I, Part A funds two types of school programs:

- **Schoolwide programs:** These programs serve all students within the school, and seek to upgrade the school's entire educational program to ensure that all students, particularly those who are low-achieving, attain high levels of academic proficiency.
- **Targeted assistance programs:** These programs target assistance to students identified as most at-risk of not meeting state academic standards.

Students experiencing homelessness who attend a school with a schoolwide or targeted assistance program may have unique challenges that are not addressed by the school's regular Title I, Part A programming, such as issues related to residential and school mobility, family disruption, and extreme poverty. These challenges may create barriers to full participation in Title I, Part A programming, and undermine the overarching program goal of helping all students meet challenging State academic standards. For instance, students residing in shelters, motels, or other overcrowded conditions may not have a quiet place to study, and may need extended after-school library time; or, a student who is dealing with the stress and anxiety associated with homelessness may not be able to focus on his or her studies, and may benefit from counseling services. Consider the ways that your school's Title I, Part A program can help meet the unique needs of students experiencing homelessness.

IDENTIFYING STUDENT NEEDS



The educational barriers experienced by students in homeless situations often are more complex and challenging than those experienced by other students. To ensure that resources are used effectively and have the greatest impact, when designing Title I, Part A schoolwide or targeted assistance programs, the Title I director and local liaison should work together to review data on the number of students experiencing homelessness and their academic performance. They also should explore any continued barriers to the educational success of these students, and ensure that these barriers are addressed through regular Title I, Part A and McKinney-Vento programming the Title I, Part A set-aside, and/or McKinney-Vento subgrant funds.

SERVING STUDENTS EXPERIENCING HOMELESSNESS WITH SET-ASIDE FUNDS

Title I, Part A requires school districts to reserve sufficient Title I funds to provide services to students experiencing homelessness that are comparable to those provided to students in Title I schools. These services may include providing educationally related support services to children in shelters and other locations where children experiencing homelessness may live [20 U.S.C. 6313(c)(3)(A)]. Homeless set-aside funds may be used to provide comparable services to students experiencing homelessness who do not attend a Title I school, but also may be used to provide services to students experiencing homelessness, including those attending Title I schools, that are not ordinarily provided to other Title I students, including funding the local liaison position, and funding transportation to and from the school of origin [ED, 2017, p. 40, 20 U.S.C. § 6313(c)(3)(C)(ii)].

ALLOWABLE USAGES OF SET-ASIDE FUNDS

Two principles govern the usage of homeless set-aside funds:

1. The services must be reasonable and necessary to assist students experiencing homelessness to take advantage of educational opportunities (ED, 2017, p. 41).

2. The funds must be used only as a last resort when funds or services are not available from other public or private sources (p. 41).

With these principles in mind, allowable usages of set-aside funds may include, but are 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;
- 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,



SCOPE, INTENSITY, AND TYPE OF SERVICES

Due to the many and varied needs of students experiencing homelessness, the Title I, Part A services provided to these students may need to be greater in scope and intensity, and/or different in nature than those normally provided to non-homeless students. For example, a student experiencing homelessness who is participating in tutoring as part of a targeted assistance program also may need counseling services due to exposure to domestic violence or other trauma that may be affecting learning. Alternatively, a district may provide an article of clothing to a student experiencing homelessness in order to allow the student to meet the school dress code. These additional services that may go beyond what is provided to all Title I, Part A students are allowable, given that they are supplemental to the regular school program, but also ensure that the student can effectively take advantage of educational opportunities.

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 Advanced Placement (AP) and International Baccalaureate (IB) testing;
- fees for college entrance exams such as the SAT or ACT; and
- GED testing for school-age students (ED, 2017, pp. 40-41);

DETERMINING TITLE I, PART A SET-ASIDE AMOUNTS

Determining an appropriate homeless set-aside amount requires coordination between the school district's Title I, Part A and McKinney-Vento programs. The set-aside may be determined based on an assessment of the needs of students experiencing homelessness within the district, considering both the number and needs of these students [20 U.S.C. § 6313(c)(3)(C)(i)]; this assessment may be the same as the needs assessment conducted as part of the district's McKinney-Vento subgrant application process [42 U.S.C. § 11433(b)(1)]. Further, the set-aside must be determined based on the total Title I, Part A allocation received by the district, and reserved prior to any allowable expenditures or transfers by the district [20 U.S.C. § 6313(c)(3)(B)].

Districts should establish their own methods for determining their homeless set-aside while working with the State offices for Title I and McKinney-Vento, as appropriate. When determining the set-aside amount, the Title I director and local liaison should partner to gather and review relevant data in order to ensure that sufficient Title I, Part A funds are reserved to meet the needs of students experiencing homelessness. As a reminder, in determining the set-aside amount, districts should allow for the provision of services to meet the unique needs of homeless students who attend Title I, Part A schools that are above and beyond services provided through the regular Title I, Part A programs at those schools, in addition to the provision of services to

homeless students who do not attend Title I, Part A schools.

Once a district has identified the needs of students experiencing homelessness to be addressed, the amount of funds necessary to provide services should be determined. In addition to planning interventions based on student needs, planned services should be of sufficient time and intensity to impact students' academic outcomes. Possible methods for calculating the set-aside amount include

- determining a percentage of the district's Title I, Part A funds to reserve for the homeless set-aside;
- multiplying the number of students experiencing homelessness identified by the district by the Title I, Part A per-pupil allocation;
- matching the amount of McKinney-Vento subgrant dollars received by the district, if applicable; or
- adjusting previous set-aside amounts based on past set-aside expenditures and trend data, such as the number of students experiencing homelessness identified, these students' academic outcomes and educational needs, and changes to the community's poverty levels and/or economy.

STRATEGIES FOR COLLABORATION TO IMPROVE STUDENT OUTCOMES

McKinney-Vento and Title I, Part A personnel should communicate and collaborate on an ongoing basis to identify the needs of children and youth experiencing homelessness, review available resources, and plan ways to address student needs. Continual cross-program interaction enables districts to respond to the emerging needs of students experiencing homelessness, and implement interventions expediently to ensure these students' academic success. Strategies to facilitate cross-program collaboration are provided below.

STRATEGIES FOR TITLE I, PART A STATE AND LOCAL DIRECTORS

- Include State Coordinators and local liaisons in coordinated systems for support, such as school support teams or a Committee of Practitioners for Title I.
- Involve homeless education personnel in the

creation of schoolwide, targeted assistance, and school improvement plans to ensure that the educational needs of students experiencing homelessness are addressed within these plans.

- Use data from a variety of sources, including McKinney-Vento, Title I, Part A, and other education interventions to determine appropriate homeless set-aside funding levels and activities.
- Include a requirement for a Title I, Part A set-aside in the Title I, Part A basic grants application issued by the State. Applications that either fail to provide a set-aside or fail to meet the minimum threshold set in the application should be required to provide a justification for omitting or limiting the set-aside.
- Include parents experiencing homelessness in Title I, Part A parent involvement activities, and create opportunities for these parents to engage in their children's education.

STRATEGIES FOR STATE COORDINATORS AND LOCAL LIAISONS

- Provide input regarding plans to serve students experiencing homelessness that may be included in Title I, Part A applications.
- Provide Title I directors with data regarding the needs of homeless students in order to determine appropriate homeless set-aside funding levels and activities.
- Work with Title I directors to establish a process for

NCHE INFORMAL NEEDS ASSESSMENT TOOL



NCHE's *Local Educational Agency Informal Needs Assessment* resource provide school districts with a series of questions, organized by topic, that may be used to determine the status of their district's services for children and youth experiencing homelessness, and to identify where to focus efforts to meet the most critical needs of these students. This resource may be helpful for determining the amount of your district's Title I, Part A homeless set-aside, and how these set-aside funds will be used. Visit <https://nche.ed.gov/pr/needs-assess.php> for more information.

accessing homeless set-aside funds and addressing emerging needs. Clearly articulate the steps a local liaison should take to access set-aside funds expediently.

- Require a description of coordination activities with Title I, Part A in McKinney-Vento subgrant applications issued by the State.
- Provide information about Title I, Part A services offered by the district in homeless education materials provided to parents, guardians, and youth.

JOINT STRATEGIES FOR TITLE I, PART A AND MCKINNEY-VENTO PROGRAMS

- Locate Title I and homeless education program offices in close proximity to facilitate cross-program communication.
- Partner to provide joint Title I, Part A and McKinney-Vento program trainings and materials.
- Share handbooks for Title I, Part A and homeless education programs, along with other resources related to serving students experiencing high poverty and mobility, with program staff.

CONCLUSION

While students experiencing homelessness often have substantial needs and face unique educational barriers, Title I, Part A and McKinney-Vento programs complement each other by sharing the common goal of identifying and meeting the educational needs of these students. Cross-program partnerships not only meet each program's statutory requirements for collaboration, but have the potential to improve the academic outcomes of students experiencing homelessness significantly.

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Every state is required to have a State Coordinator for Homeless Education, and every school district is required to have a local homeless education liaison. These individuals oversee the implementation of the McKinney-Vento Act. To find out who your State Coordinator is, visit the NCHE website at http://ncche.ed.gov/states/state_resources.php.

For more information on issues related to the education of children and youth experiencing homelessness, contact the NCHE helpline at 800-308-2145 (toll-free) or homeless@serve.org.

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