



# McKinney-Vento: Principles Governing The Use of Title I Funds

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NC State University – McKimmon Center

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# *North Carolina Homeless Education Program (NCHEP)*



- ✓ NCHEP ensures that all children and youth experiencing homelessness have access to the public education to which they are entitled to under the Federal McKinney-Vento Act.
- ✓ NCHEP ensures that North Carolina's state policies are in compliance with federal law.
- ✓ NCHEP oversees all programmatic aspects of the state homeless education program while DPI oversees the fiscal components of the program.
- ✓ NCHEP is part of the Federal Program Monitoring and Support Services Division with NCDPI.

## *Identification of Homeless Children and Youth in NC Schools*

<b>School Year</b>	<b>Total Number Reported in the Consolidated State Performance Report (CSPR)</b>
<b>2014 - 2015</b>	Expecting 27,000+
<b>2013 – 2014</b>	26,923
<b>2012 – 2013</b>	27,369
<b>2011– 2012</b>	27,802
<b>2010 – 2011</b>	25,392
<b>2009 - 2010</b>	21,300
<b>2008 - 2009</b>	18,815
<b>2007 - 2008</b>	16,947

## *Defining Homelessness*

**Individuals who lack a fixed, regular, and adequate nighttime residence.**

- ✓ ***Fixed residence***: is one that is stationary, permanent and not subject to change.
- ✓ ***Regular residence***: is one that is used on a regular basis (i.e. nightly)
- ✓ ***Adequate residence***: is one that is sufficient for meeting both the physical and psychological needs typically met in home environments.

*If a living situation does not meet all 3 (fixed, regular and adequate)  
then the situation is considered homeless.*

*Decisions should be made on a case-by-case determination.*

## *McKinney-Vento Homeless Assistance Act*

A federal law designed to increase the school enrollment, attendance, and success of children and youth who lack a fixed, regular and adequate nighttime residence.



## *Main Provisions of the Law*

- ✓ School access
- ✓ School stability
- ✓ Support for academic success
- ✓ Access to services including transportation
- ✓ Decision making is child-centered and in the student's best interest
- ✓ Designate a homeless liaison in every school district

# *School District Responsibilities in the Law*

Every LEA must designate a homeless liaison to:

- ✓ Identify homeless students
- ✓ Ensure homeless students receive full and equal opportunity to succeed in school
- ✓ Link students with appropriate services and facilitate service provision
- ✓ Ensure homeless students receive transportation
- ✓ Handle disputes
- ✓ Inform parents, guardians, or youth of educational rights
- ✓ Support unaccompanied homeless youth (UHY) with school selection
- ✓ Ensure the public posting of educational rights through the school district and community
- ✓ Collaborate with other district programs and community agencies

## *School Mobility Affects*

- ✓ Fall behind academically
- ✓ Lower standardized test scores
- ✓ Psychological and social difficulties
- ✓ Less likely to participate in extracurricular activities
- ✓ More likely to act out or get into trouble
- ✓ Score significantly lower in high schools with high student mobility rates



## *School Stability*

Can remain in ***school of origin*** or enroll in any school where housed students in the local attendance area can attend.

*School of origin* – school attended when permanently housed or where last enrolled

Keep homeless students in their schools of origin to the extent feasible

- ✓ unless this is against the parent, guardian, or unaccompanied youth's wishes
- ✓ based on student's best interest

*Once it is determined it is in the best interest of a child to remain in their SOO then the liaison should be reviewing feasibility and consulting with appropriate personnel.*

## *Feasibility Sample Criteria*

- ✓ Continuity of instruction
- ✓ Age of the student
- ✓ Safety issues
- ✓ Expected length of stay in temporary housing
- ✓ Likely area where the family will find permanent housing
- ✓ Need for special educational programs
- ✓ Distance of commute and impact on student's education
- ✓ School placement of siblings
- ✓ Time remaining in the school year

# *Awaiting Foster Care Placement*

US Department of Education Guidance states:

- Awaiting foster care placement = homeless
- Already in foster care = not homeless
- Local DSS agencies and school districts should coordinate to determine how to support students in and awaiting foster care

Guidance available at:

[www.ed.gov/programs/homeless/guidance.pdf](http://www.ed.gov/programs/homeless/guidance.pdf)

# Principles Governing The Use of Title I, Part A Funds

- ✓ The services must be reasonable and necessary to assist homeless students to take advantage of educational opportunities. (ESEA section 1113(c)(3)(A); OMB Circular A-87, Attachment A, C.1.a)
- ✓ Title I, Part A funds must be used as a last resort when funds or services are not reasonably available from other public or private sources, such as the U.S. Department of Agriculture's free- and reduced-price school lunch program, public health clinics, or local discretionary funds (sometimes provided by the PTA) used to provide similar services for economically disadvantaged students generally. (ESEA section 1115(e)(2).)
- ✓ The funds may support additional tutoring services for homeless students in Title I and non-Title I schools, as well as in shelters and hotels or motels where homeless families live.
- ✓ The funds may also be used to remove barriers homeless students face to enable them to participate in educational activities, such as providing support for educational field trips, counseling, or school uniforms.
- ✓ The funds should not be used for items such as rent, utilities, or clothing for parents.
- ✓ The funds cannot be used to transport homeless children and youth to and from their school of origin.
  - ***New guidance does support the excess cost.***
- ✓ Title I funds could be used to transport a student to their school of origin once they are housed and for the remainder of the school year.

# *Title I Coordinator and Homeless Liaison Collaboration*

The Education for Homeless Children and Youth (EHCY) program authorized by the McKinney-Vento Homeless Assistance Act and specific Title I requirements that pertain to Title I services to homeless children and youth require coordination between the Homeless Liaison and Title I Director.

- ✓ Work together to determine an appropriate amount for funds to be reserved for homeless students. Meetings between both should occur throughout the school year so that the homeless set aside funds can be spent appropriately.
- ✓ The Title I coordinator and homeless liaison should be very familiar with each other's program.
- ✓ *How do you determine an amount? Together? Individually? Formula based?*

## *Review Data...*

The Title I Director and Homeless Liaison should review data on homeless students in the school district annually to address the following questions:

1. How many homeless students were enrolled in our schools during the past year?
2. How many of these students attended non-Title I schools?
3. What are the greatest unmet educational needs of homeless children and youth in the district?

## *Ways to Determine Set Aside Amounts*

1. Base amounts on an annual needs assessment for homeless students
2. Multiply the number of homeless students by the Title IA per pupil allocation
3. For districts with subgrants, reserve an amount equal to or greater than the MV funding request
4. Reserve a percentage based on the district's poverty level or Title IA allocation

## *New Authority...* *as of 7/22/14*

The allowable use of Title I, Part A funds to support various activities has changed. New authority in the Consolidated Appropriations Act, 2014, as described below, expands the allowable use of Title I funds to:

- ✓ support local homeless liaison salaries
- ✓ the costs to transport homeless children and youth to and from their school of origin

Specifically, the appropriations language states:

*Provided further, that funds available under sections 1124, 1124A, 1125 and 1125A of the ESEA may be used to provide homeless children and youths with services not ordinarily provided to other students under those sections, including supporting the liaison designated pursuant to section 722(g)(1)(J)(ii) of the McKinney-Vento Homeless Assistance Act, and providing transportation pursuant to section 722(g)(1)(J)(iii) of such Act.*



*May Title I funds  
be used to  
support in full  
an LEA's  
homeless  
liaison?*



Yes.

Section 722(g)(1)(J)(ii) of McKinney-Vento requires each LEA in a State that receives McKinney-Vento funds to designate an appropriate staff person, who may also be a coordinator for other Federal programs, as a liaison for homeless children and youth. Prior to the FY 2014 appropriations language, ED indicated that, because highlighted language specifically permits another Federally-funded coordinator to perform these duties, an individual paid, in whole or part, with Title I funds may serve as a homeless liaison in addition to his or her Title I duties. Consistent with the appropriations language cited above, an LEA may use funds from its FY 2014 Title I grant (and, consistent with GEPA section 425(b), Title I carryover funds) to fund all or part of the homeless liaison's salary even if that person has no Title I duties.

## *Homeless Liaison Position Funded with Title I, Part A*

- ✓ The McKinney-Vento Homeless Assistance Act requires each LEA to designate an appropriate staff person, who may also be a coordinator for other Federal programs, as a liaison for homeless children. (MVHAA Section 722(g)(1)(J)(ii)).
- ✓ Title I, Part A funds may be used to support a homeless liaison POSITION.
- ✓ Because the statute specifically authorizes that another Federally funded coordinator may perform these duties, an individual paid, in whole or in part, with Title I, Part A funds may also serve as a homeless liaison.
- ✓ The FTE paid out of Title I should be in proportion to the liaison's duties.
- ✓ If paying out of Title I for the position of a homeless liaison then during monitoring expect more probing questions about Title I-related duties and the use of the reservation.

# *May Title I funds be used to transport homeless children and youth to their school of origin?*



Yes.

If a State Educational Agency (SEA) receives McKinney-Vento funds, and all states do, the SEA and its LEAs must adopt policies and practices to ensure that transportation is provided to homeless children and youth, at the request of the parent or guardian (or, in the case of an unaccompanied youth, the liaison), to and from the “school of origin” in accordance with applicable requirements, including the following:

- ✓ If a homeless child or youth continues to live in the area served by the LEA in which the school of origin is located, that LEA must provide or arrange for the child or youth’s transportation to and from the school of origin.
- ✓ If the homeless child or youth continues his or her education in the school of origin but begins living in an area served by another LEA, the LEA of origin and the LEA in which the homeless child or youth is living must agree upon a method to apportion the responsibility and costs for providing the child with transportation to and from the school of origin. If the LEAs cannot agree upon a method, the responsibility and costs for transportation must be shared equally.

The FY 2014 appropriations language however, specifically authorizes an LEA to use FY 2014 Title I funds (and, consistent with GEPA section 425(b), Title I carryover funds) to pay transportation costs associated with transporting homeless children and youth to and from their school of origin. These allowable costs are the incremental costs to transport a homeless child or youth to his or her school of origin above what the LEA would have otherwise provided to transport the student to his or her assigned school.

# *Allowable Activities with Title I Set Aside Funds for Homeless Education*

- Items of clothing to meet a dress or uniform code
- Clothing and shoes necessary to participate in physical education classes
- Student fees that are necessary to participate in the general education program (and if they cannot be waived)
- School supplies
- Birth certificates
- Immunizations
- Eyeglasses / hearing aids
- Medical / dental services
- Extended learning time (before / after school, Sat. classes, summer school)
- Parental involvement specifically oriented to reach out to parents of homeless students
- Tutoring services – at shelters or other locations where homeless children stay at night
- Counseling services
- Outreach services
- SAT Testing
- GED Testing

## *Homeless Set Aside Funds...*

### *Prohibited Uses*

- Transportation to/from the school of origin (basic cost)
  - New guidance does support excess transportation cost
- Rent
- Utilities
- Clothing for parents
- Class rings, yearbooks, or other school year memorabilia
- And others...

## *Questions to Consider ....*

- Does the expense meet the intent of the law?
- Can the expense be categorized as one of the authorized activities in the law?
- Does the expense cover services that apply only to the homeless education program and addresses the needs of homeless students?
- Does the expense fit within the goals of the subgrant program?
- Is the expense necessary for the efficient operation of the homeless education program?
- Is the expense reasonable in proportion to the rest of the program budget and the amount spent per student?
- Is the cost reasonable?
- Is the expense for supplemental services?
- Is there evidence of coordination with Title I?
- Could this service be obtained from another source?

# *To which fiscal years' Title I funds does the appropriations language apply?*



The appropriations language applies to the **FY 2014 and 2015 Title I funds** and, under the authority in section 425(b) of the General Education Provisions Act (GEPA), to **FYs 2012 and 2013 Title I carryover funds as well**. Accordingly, an LEA may spend funds from its **FY 2014 and 2015 Title I** allocation and unobligated Title I carryover funds to pay for the homeless liaison or to transport homeless children and youth to their school of origin.

## *Accounting for Additional Reservation in CCIP*

- ✓ To account for the additional reservation, the web-based grants management system has been updated to allow LEAs that wish to reserve these additional funds to ensure that compliance with requirements of section 1113(c)(3)(A) can be demonstrated in the application for Title I funding.
- ✓ The updates included renaming the existing line on the Set-Asides page for the homeless reservation to “Homeless (Section 1113(c)(3)(A) comparable to Title I PPA).” In addition, a new line was added to the Set-Asides page for “Homeless (Consolidated Appropriations Act 2014)” for reserving Title I funds for transportation costs and homeless liaison salaries, as needed.



# *North Carolina Homeless Education Program (NCHEP)*

1-800-659-3204

[www.serve.org/hepnc](http://www.serve.org/hepnc)

or

<http://www.ncpublicschools.org/program-monitoring/homeless>

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