



STATE OF SOUTH CAROLINA
DEPARTMENT OF EDUCATION

MEMORANDUM

TO: Federal Programs Coordinators
McKinney-Vento Homeless Liaisons
Superintendents
Title I, Part A Coordinators

FROM: Jewell Stanley
Interim Director, Office of Federal and State Accountability

DATE: October 24, 2023

RE: Title I, Part A Homeless Set Aside

The purpose of this memorandum is to provide updated guidance for local education agencies (LEA) and mandatory Title I, Part A Homeless Set Aside (TIPAH) reservations in accordance with §1113(c)(3) of the Elementary and Secondary Education Act of 1965 (ESEA), as amended.

A local education agency (LEA) may determine the TIPAH reservation amount based on a needs assessment that considers the numbers and needs of children and youth experiencing homelessness. The reservation can be used to provide children and youth experiencing homelessness with services not ordinarily provided to other (housed) Title I students. Uses of funds can include but are not limited to a local homeless liaison's salary, expenses, school of origin transportation, and other services to allow children and youth experiencing homelessness to fully participate in school.

While federal laws and non-regulatory guidance do not address a specific amount of funding per pupil identified, LEAs must ensure that the TIPAH is sufficient to address the needs of students experiencing homelessness. The South Carolina Department of Education (SCDE) provides the following guidance for determining a sufficient TIPAH reservation.

- The TIPAH reservation should consider any other grant funding received to serve students experiencing homelessness, including Education of Homeless Children and Youth (EHCY), American Rescue Plan–Homeless Children and Youth (ARP-HCY), and other Community-Based Organization (CBO) collaborations.

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- LEAs are encouraged to use the [MV Needs Assessment](#), enrollment data, program evaluation, and cost data on expenditures to assist in determining the reservation.
- An LEA should not reserve the same amount of Title I, Part A funds over multiple years when the student count increased or decreased significantly from the previous year.
- An LEA may use a districtwide per-pupil amount for homeless students if this approach yields a sufficient reservation amount for the LEA to meet program requirements.
- An LEA's Title I Set-Aside allocation could include a minimum of \$100 per pupil identified with their Title I Set-Aside. A higher allocation would include \$400–\$500 per pupil. For example, if a District's MV-verified count was 30 students, a proposed \$3,000–\$15,000 range would be acceptable for the district's Title I, Part A Set-aside.

Additionally, the reauthorization of the ESEA through the Every Student Succeeds Act (ESSA) resulted in the removal of 'awaiting foster care' from the definition of McKinney-Vento. An LEA's TIPAH **must not** include costs for Foster Care transportation. Foster Care transportation can be paid for with Title I, Part A funds but can be included in a separate Title I, Part A Set Aside to help ensure that the LEA meets its obligations to provide school stability for students in Foster Care.

The SCDE's Office of Federal and State Accountability (OFSA) will play a critical role in assisting LEAs in implementing these changes consistent with the changes in ESEA. The SCDE has increased coordination between the McKinney-Vento State program office, and Title I program staff, to ensure homeless students receive the Title I services comparable to other children receiving funded Title I, Part A services. We recommend LEAs increase collaboration of the [Title I, Part A Coordinators and McKinney-Vento Liaisons](#) in creating the LEA's plan for the Set Aside.

For questions regarding McKinney-Vento, please contact your district's MV point-of-contact at mckinneyvento@ed.sc.gov. For questions regarding Title I, Part A applications, please contact your district's program manager.