Determining the Title I, Part A Homeless Set Aside Amount
A Work Sheet to Guide a Conversation between Local Educational Agency Homeless Liaisons and Title I Coordinators

(Developed by the 2018 Title I Work Group Convened by the National Center for Homeless Education)

The Elementary and Secondary Education Act (ESEA), as amended by the Every Student Succeeds Act (ESSA), requires an LEA to reserve Title I funds necessary to provide educationally related support services to homeless children and youths regardless of whether they attend a Title I school *and* to provide for their unique needs. Local educational agencies (LEAs), whether they have identified many or few homeless students, often struggle to determine an appropriate Title I, Part A homeless set aside amount. The Education for Homeless Children and Youths Program Non-Regulatory Guidance suggests the following for determining the amount of funds to reserve for comparable services under Title I, Part A:

> Funds reserved for comparable services under section 1113(c)(3)(A)(i) of the ESEA may be determined based on a needs assessment of homeless children and youths in the LEA, taking into consideration the number of homeless children and youths identified by the LEA and their unique needs. (ED, 2017, p. 41)

This work sheet provides questions to guide an initial conversation between LEA homeless liaisons and Title I coordinators concerning the needs of homeless students in the school district. The LEA homeless liaison and Title I coordinator, along with any other staff or stakeholders, should meet to discuss the questions in the worksheet. Any data that can be gathered before the meeting would provide a concrete basis for needs discussed.

The questions cover six of the most critical areas of services for homeless children and youth for which LEAs allocate Title I, Part A homeless set aside funds:

- identification of homeless children and youth
- LEA capacity to serve homeless children and youth
- meeting academic needs of homeless children and youth
- meeting unique needs of homeless children and youth
- serving preschool-aged homeless children
- meeting school transportation needs of homeless children and youth

Although the work sheet is not a complete needs assessment, it is a useful tool to strengthen coordination between the homeless education program and Title I, Part A program and to begin the process for determining an appropriate Title I, Part A homeless set aside allocation to meet the needs of homeless students.

Questions to Consider for Determining the Title I, Part A Homeless Set Aside

Meeting Date:
Participants:
LEA Liaison:
Title I Coordinator:
Others:

Identification of Homeless Children and Youth

Questions	*Notes*
How many homeless students has the LEA identified in the past three years? • Are the numbers increasing or decreasing? • Are there any economic trends in the community that would indicate a rise in the number of homeless children and youth and their families?	
What is the level of poverty in the LEA? (Use Free and Reduced Meals, Census, or KidsCount data.)	
In comparing the number of homeless children and youth identified in the LEA with other data sources indicating community child poverty levels, to what extent • Are the number of homeless students identified reasonable in relation to the level of child poverty? • Is there a need for greater outreach and training to identify all homeless children and youth in the LEA?	
What is the count of homeless children and youth in shelters? If the shelter count is not significantly lower than the number of homeless children and youth identified by the LEA, to what extent is there a need for greater outreach and training to identify homeless children	

and youth who meet other components of the McKinney-Vento definition of homeless, such as those living in doubled-up situations?	
Level of Need: ❑ Critical ❑ Moderate ❑ Insignificant	
Should a portion of the Title I, Part A set aside be allocated to this area? ❑ Yes ❑ No If yes, what activities or resources should the Title I, Part A set aside support?	
What additional data and programmatic and budgetary information is needed to assist with determining the amount of Title I, Part A homeless set aside that should be allocated to this area?	

Capacity to Identify and Serve Homeless Children and Youth

Questions	*Notes*
What percentage of time is allocated for the homeless liaison position and other positions to serve homeless children and youth in the LEA?	
To what extent does this staff allocation allow the LEA to carry out all the requirements in the McKinney-Vento Act? See 42 U.S.C. § 11432 (g)(6)(A).	
What awareness and outreach do the local liaison conduct to identify homeless children? Are these efforts sufficient to identify all homeless children in the community? What further outreach and training need to take place to help identify homeless children and youth?	

What indications exist that more time is needed for staff to serve homeless children and youth? For example, which of the following has the LEA experienced? • Enrollment barriers for homeless students • Disputes over eligibility or school selection or enrollment in a school • Lack of individualized attention to assess each homeless student's needs and connect the student to services • Minimal community collaborations and partnerships	
Level of Need: ❑ Critical ❑ Moderate ❑ Insignificant	
Should a portion of the Title I, Part A set aside be allocated to this area? ❑ Yes ❑ No If yes, what activities or resources should the Title I, Part A set aside support?	
What additional data and programmatic and budgetary information are needed to assist with determining the amount of Title I, Part A homeless set aside that should be allocated to this area?	

Meeting the Academic Needs of Homeless Children and Youth

Questions	*Notes*
What are the academic proficiency rates of homeless children and youth on state assessments compared to other students in the LEA? Compared to the overall state averages? Compared to other economically disadvantaged students?	
What is the level of chronic absenteeism among homeless students as compared to the LEA and state average?	

What is the graduation rate for homeless youth as compared to the LEA and state average?	
How many homeless students participate in tutoring programs or other academic supports, both during the school day and outside of school, as compared to the total number of homeless students identified in the LEA?	
How many homeless students are served by Title I programs? How does this number compare to the number of homeless students identified in the LEA?	
What supports or programs exist to educate or re-engage homeless youth who are not attending school?	
What supports or programs exist to help homeless youth with credit accrual and recovery and with preparation for post-secondary education?	

Level of Need:

- ❑ Critical
- ❑ Moderate
- ❑ Insignificant

Should a portion of the Title I, Part A set aside be allocated to this area?

- ❑ Yes
- ❑ No

If yes, what activities or resources should the Title I, Part A set aside support?

What additional data and programmatic and budgetary information are needed to assist with determining the amount of Title I, Part A homeless set aside that should be allocated to this area?

Meeting the Unique Needs of Homeless Children and Youth

Questions	*Notes*
What is the level of homeless students' unique and unmet needs for items such as those listed in the federal guidance under M-4 as types of services an LEA may provide to homeless students with funds reserved through the Title I, Part A homeless set aside (ED, 2017, p. 40)? • Clothing, particularly to meet school dress or uniform requirements • Student fees 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 • Outreach to students living in shelters, motels, and other temporary residences • Extended learning time • 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 AP and IB testing • Fees for college entrance exams • GED testing for school-aged students	
Level of Need: ❑ Critical ❑ Moderate ❑ Insignificant	

Should a portion of the Title I, Part A set aside be allocated to this area? ❑ Yes ❑ No If yes, what activities or resources should the Title I, Part A set aside support?
What additional data and programmatic and budgetary information are needed to assist with determining the amount of Title I, Part A homeless set aside that should be allocated to this area?

Serving Preschool-Aged Homeless Children

Questions	*Notes*
How many preschool-aged homeless children has the LEA identified in the past school year?	
How many preschool-aged homeless children were enrolled in a preschool program during the past school year?	
What challenges does the LEA have in serving preschool-aged homeless children?	
Level of Need: ❑ Critical ❑ Moderate ❑ Insignificant	
Should a portion of the Title I, Part A set aside be allocated to this area? ❑ Yes ❑ No If yes, what activities or resources should the Title I , Part A set aside support?	

What additional data and programmatic and budgetary information are needed to assist with determining the amount of Title I, Part A homeless set aside that should be allocated to this area?

Meeting School Transportation Needs of Homeless Children and Youth

Questions	*Notes*
For how many homeless children and youth did the LEA provide transportation to and from the school of origin during the past school year?	
During the past school year, what was the excess cost of transporting homeless students to and from their school of origin? Question J-8 in the federal guidance states "the excess cost is the difference between what an LEA normally spends to transport a student to school and the cost of transporting a homeless student to school" (ED, 2017, p. 28).	
To what extent is transportation a barrier for preschool-aged homeless children to participate in preschool programs, including remaining in the school of origin?	
To what extent is transportation a barrier for homeless students to participate in extracurricular activities?	
Level of Need: ❑ Critical ❑ Moderate ❑ Insignificant	
Should a portion of the Title I, Part A set aside be allocated to this area? ❑ Yes ❑ No If yes, what activities or resources should the Title I, Part A set aside support?	

What additional data and programmatic and budgetary information are needed to assist with determining the amount of Title I, Part A homeless set aside that should be allocated to this area?

Next Steps

A discussion of these questions should lead to a more detailed conversation about the actual costs of meeting the needs of homeless students and what amount should be allocated for the Title I, Part A homeless set aside. Local liaisons and Title I coordinators should identify for which areas the LEA's Title I, Part A homeless set aside should be allocated. Note that the U.S. Department of Education has set an expectation that all LEAs with Title I programs should have a homeless set aside even if they do not identify any or many homeless students.

Next steps should include gathering more information to ensure that the amounts allocated to the specific areas align with the costs and expenses for addressing these areas. The result will be a Title I, Part A homeless set aside allocation that enables the LEA to sufficiently meet the needs for identifying and serving homeless students. Moreover, the worksheet can serve as documentation of the process for determining the homeless set aside.

LEAs may wish to conduct a more thorough needs assessment related to serving homeless children and youth. There are several options for needs assessments and tools to determine the needs of homeless students, including needs assessments that many states require LEAs to conduct to apply for a McKinney-Vento subgrant, NCHE's Local Educational Agency Informal Needs Assessment, and a tool that was developed by Washington State and posted on the School House Connection website.

For further assistance, contact the homeless State Coordinator or Title I Coordinator in your state, or contact the National Center for Homeless Education at 800.308.2145 or homeless@serve.org.

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Reference

U.S. Department of Education. (2017). *Education for Homeless Children and Youths Program Non-Regulatory Guidance*. Retrieved from https://www2.ed.gov/policy/elsec/leg/essa/160240ehcyguidance072716updated0317.pdf