

Excerpt from March 2003:

**EDUCATION FOR HOMELESS CHILDREN AND YOUTH PROGRAM TITLE VII-B OF THE MCKINNEY-VENTO HOMELESS ASSISTANCE ACT, AS AMENDED BY THE NO CHILD LEFT BEHIND ACT OF 2001
DRAFT NON-REGULATORY GUIDANCE. WASHINGTON, DC: UNITED STATES DEPARTMENT OF EDUCATION.**

(The full guidance report can be accessed: <http://web.wm.edu/hope/legislation/doe.pdf>.)

M. Coordination with Title I, Part A of the ESEA

M-1. Are homeless children and youth eligible to receive Title I, Part A services?

Yes. Homeless children and youth are automatically eligible for services under Title I, Part A of the ESEA, whether or not they live in a Title I school attendance area or meet the academic standards required of other children for eligibility. Homeless children and youth may receive Title I educational or support services from schoolwide and targeted-assistance school programs.

A State must include in its State Title I plan a description of how the plan is coordinated with the McKinney-Vento Act. *See* Section 1111(a)(1) of the ESEA. Additionally, an LEA receiving Title I, Part A funds must include in its local plan a description of how the plan is coordinated with the McKinney-Vento Act. The local plan must describe services provided to homeless children.

M-2. Are homeless children and youth who attend non-Title I schools eligible to receive Title I, Part A services?

Yes. An LEA must provide comparable services to a homeless student who does not attend a Title I school. An LEA must reserve funds for homeless children who do not attend participating Title I schools and may, for instance, provide support services to children in shelters and other locations where homeless children live. Services should be provided to assist homeless students to effectively take advantage of educational opportunities.

This provision applies to homeless students in public and private schools, institutions for neglected children and, where appropriate, local institutions such as local community day school programs. *See* Section 1113 of the ESEA.

SEA and LEA Title I plans must be coordinated with the plans agencies develop under the McKinney-Vento Act. LEAs can develop formulas for reserving the appropriate amount of Title I funding for students who are experiencing homelessness, as required in Section 1113(c)(3). However, Title I funds may not be used to assist with transportation costs (*See* H-4 above).

M-3. What types of services may an LEA provide to homeless students with funds reserved under Section 1113(c)(3) of Title I?

An LEA may use funds reserved under this section to provide services to eligible homeless students in both Title I and non-Title I schools that are comparable to services provided to non-homeless students in Title I schools. Services provided should assist such children in meeting the State's challenging academic content and academic achievement standards.

An LEA has the discretion to use reserved funds to provide a homeless student with services that are not ordinarily provided to other Title I students and that are not available from other sources. For example, where appropriate, an LEA at its discretion may provide a student with an item of clothing to meet a school's dress or uniform requirement so that student may effectively take advantage of educational opportunities.

Reservation of Fund for Homeless Students

Many school districts with subgrants pool Title I and McKinney-Vento funds to support extended day and summer activities, provide school supplies, tutoring and other resources.

Several States provide formulas for all LEAs to use Title I set-asides based on shelter counts (nightly average multiplied by a district's per-pupil allocation). LEAs may adjust the amounts based on local data and needs assessments.

Several LEAs use local counts (one month averages and one day counts) of homeless students multiplied by Title I per-pupil allocation to compute set-aside amounts.

Symposium on Homeless Education and Title I - Hosted by U.S. Department of Education and the National Center for Homeless Education (NCHE) 2001 References, Appendix G

M-4. Does a State's academic assessment system need to include homeless students?

Yes. The final regulations that implemented changes to the standards and assessment requirements of Title I, Part A require States to include homeless students in their academic assessment, reporting, and accountability systems, consistent with section 1111(b)(3)(C)(xi) of the ESEA. Assessments of homeless students are to be included in school district or in State accountability when students have been in a school for a full academic year. However, States are not required to disaggregate, as a separate category, the assessment results of homeless students.

As homeless children and youth fall at the low end of the poverty continuum, LEAs and States should include the assessments of homeless students in the economically

disadvantaged category of disaggregation, in addition to other applicable categories (e.g., “all student category”).

Strategies to Facilitate Coordination and Collaboration Between Title I and the McKinney-Vento Act

- Ensure that LEA local liaisons attend Title I conferences and in-services, and that Title I coordinators attend homeless education conferences and in-services.
- Ensure collaboration between local Title I coordinators and LEA local liaisons on a plan that identifies ways that Title I will serve children and youth experiencing homelessness.
- Ensure collaboration between the State Title I coordinator and the State McKinney-Vento coordinator on the State Title I plan or the State consolidated plan.
- Share Title I and Homeless Education handbooks with programs.
- Collect and share across within and across districts concrete data on the needs of children and youth in homeless situations.
- Initiate district efforts to make organizational accommodations for eligible students as necessary in such areas as transportation, remaining in the school of origin, records transfer, class scheduling, and special services that will help them enroll, attend, and succeed in school.
- Ensure that the needs of highly mobile students are included in the school improvement plans and not addressed as a separate issue.
- Establish and widely disseminate information on district-wide policies, procedures, and guidelines to identify and serve eligible students.
- Ensure LEA homeless liaison representation on the Committee of Practitioners.
- Include homeless parents in Title I parental involvement policies and create opportunities for homeless parents to be involved.

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References, Appendix G