Serving Students Experiencing Homelessness Under Title I, Part A

This California Homeless Education Technical Assistance Center (HETAC) tip sheet explores opportunities for LEA homeless education and Title I, Part A programs to work together to support students experiencing homelessness, including

- statutory requirements under the McKinney-Vento Homeless Assistance Act and Title I, Part A of the Elementary and Secondary Education Act;
- best practices for determining the Title I, Part A homeless reservation; and
- strategies for building effective partnerships across homeless education and Title I, Part A programs.

This tip sheet is part of a suite of HETAC Title I, Part A resources that also includes the following:

- *Allowable and Strategic Uses of Title I, Part A Homeless Reservation Funds*
- *Working Together Across Homeless Education and Title I, Part A: Cross-Program Partnership Strategies*
- *Making the Case for Partnership Across Homeless Education and Title I, Part A Programs*

Context

Children and youth experiencing homelessness often face unsteady and even traumatic circumstances in their everyday lives outside of school, which, in turn, create unique barriers to their success in school. Despite data consistently showing an increased risk of academic setbacks among students experiencing homelessness in California as compared to their housed peers, many local educational agencies (LEAs) in the state do not receive dedicated federal homeless education funding.



This HETAC tip sheet, part of a suite of HETAC Title I, Part A resources, explores opportunities for LEA homeless education and Title I, Part A programs to work together to support students experiencing homelessness with their Part A homeless reservation funds, including statutory requirements under the McKinney-Vento Homeless Assistance Act and Title I, Part A of the Elementary and Secondary Education Act, best practices for determining the Title I, Part A homeless reservation, and strategies for building effective partnerships across homeless education and Title I, Part A programs.

About the EHCY Program

Authorized by the McKinney-Vento Homeless Assistance Act (Subtitle VII-B – Education for Homeless Children and Youths, reauthorized under the Every Student Succeeds Act; hereafter *McKinney-Vento Act*), the federal Education for Homeless Children and Youths (EHCY) Program provides grants to state educational agencies (SEAs) to ensure that children and youth experiencing homelessness have access to a free appropriate public education. SEAs and LEAs ensure this by reviewing and revising policies and practices that may act as a barrier to the school identification, enrollment, attendance, or success of these students as well as upholding these students' educational rights and providing targeted supports as directed in statute (42 U.S.C. § 11431 *et seq.*). Under the McKinney-Vento Act, LEAs must designate an appropriate staff person to serve as the LEA's homeless education liaison (hereafter *liaison*) and carry out

the duties of the liaison as established in statute [42 U.S.C. § 11432(g)(1)(J)(ii); 42 U.S.C. § 11432(g)(6)(A)]. All LEAs are required to implement the provisions of the McKinney-Vento Act regardless of funding status.

Visit the California Department of Education's *Homeless Education* webpage as well as the HETAC's *The Educational Rights of Students Experiencing Homelessness: A Primer for California Local Educational Agencies* and *A Guide to the Homeless Liaison Role in California: Legal Guidelines and Implementation Strategies* webpages for more information.

About the Title I, Part A Program

Title I, Part A of the Elementary and Secondary Education Act (hereafter *Title I, Part A*), as amended, provides federal education funding to LEAs and schools with high numbers or percentages of children from low-income families. LEAs and schools use these funds to support effective, evidence-based educational strategies that close achievement gaps and enable economically disadvantaged students to meet California's challenging academic standards.

Title I, Part A supports several types of programming:

- Schoolwide programs: Schoolwide programs are intended to improve the entire educational program in a school with the goal of improving outcomes for all students.
- Targeted assistance programs: Targeted assistance programs serve specific children identified as having the greatest academic need, as well as teachers or staff who provide services to these children.
- Reservation-funded programming: Reservations refer to monies reserved "off the top" of an LEA's Title I, Part A allocation to target funds to a specific focus or student subgroup; examples include parent and family engagement, students deemed "neglected or delinquent", and students experiencing homelessness (see below).

Visit the California Department of Education's *Title I, Part A* webpage for more information.

Serving Students Experiencing Homelessness under Title I, Part A

Federal statutes require that EHCY and Title I, Part A programs partner to serve students experiencing homelessness.

Eligibility



Children and youth experiencing homelessness are automatically eligible for Title I, Part A services, whether or not they live in a Title I, Part A school attendance area or meet the academic standards required of other students for eligibility [20 U.S.C. § 6315(c)(2)(E)]. Students experiencing homelessness may be served in Title I, Part A schoolwide programs, in targeted assistance programs, or using Title I, Part A funds that must be reserved for students experiencing homelessness. Students experiencing homelessness who are enrolled in non-Title I, Part A schools also are eligible to receive Title I, Part A services [20 U.S.C. § 6313(c)(3)(A)].

LEA Title I, Part A Plans

When developing their LEA Title I, Part A plans and deciding on their homeless reservation amount, LEAs must conduct timely and meaningful consultation with the liaison, must describe how their Title I, Part A program is coordinated with their EHCY program, and must describe the Title I, Part A services that will be provided to students experiencing homelessness to support their school enrollment, attendance, and success [20 U.S.C. § 6312(a)(1); 20 U.S.C. § 6312(b)(6)]. The Consolidated Application and Reporting System, or CARS, is a two-part application and reporting process for multiple state and federal program funds, including Title I, Part A reservation for homeless funds. The Title I, Part A reservation for homeless funds page in CARS—entitled *Homeless Education Policy, Requirements, and Implementation*—requires LEAs to indicate various information on their implementation of EHCY.

Collaboration Between Title I, Part A and Homeless Education

Effective coordination between these two programs, given the requirements in both programs to serve homeless children and youth, is required and can have substantive impacts on many homeless students.

Leveraging the LEA Title I, Part A Homeless Reservation

About the Homeless Reservation

In addition to serving students experiencing homelessness under Title I, Part A schoolwide and targeted assistance programs, LEAs are required to reserve a portion of their Title I, Part A allocation specifically for meeting the needs of children and youth experiencing homelessness [20 U.S.C. § 6313(c)(3)(A)(1)]; this often is referred to as the "homeless reservation." Calculation of the homeless reservation must be based on the amount of the total Title I, Part A allocation received by the LEA and reserved prior to any additional LEA expenditures or reservations [20 U.S.C. § 6313(c)(3)(B)].

Best Practices for Determining the Title I, Part A Homeless Reservation

While there is no single required approach for LEAs to determine their homeless reservation amount, LEAs can consider the calculation methods shared below. The reservation amount should reflect identified student needs and be based on a collaborative consultation across the EHCY and Title I, Part A programs, including the designated homeless liaison.

- Using a needs assessment
  Title I, Part A states that LEAs may determine the amount of their homeless reservation based on a needs assessment that considers the number and needs of students experiencing homelessness in the LEA; this assessment may be the same as the needs assessment conducted by the LEA as part of its EHCY funding application [20 U.S.C. § 6313(c)(3)(C)(i)]. Using a needs assessment to determine the reservation amount ensures that funds are allocated based on actual student needs rather than informal estimates. Needs assessments also often incorporate data-driven decision making and provide the LEA with a thoughtful, documented process for deciding their reservation amount.

- Multiplying the LEA homeless student count by the Title I, Part A per-pupil allocation
  Based on the specifics of their local context (e.g., the total LEA Title I, Part A allocation, the number of low-income students in the LEA, etc.), LEAs establish a Title I, Part A per-pupil allocation. LEAs also are

required to collect and report data annually on the number of children and youth experiencing homelessness in the LEA [42 U.S.C. § 11432(g)(6)(C)]. LEAs may determine the amount of their homeless reservation by multiplying their Title I, Part A per-pupil allocation by the number of students experiencing homelessness identified by the LEA in the most recent school year. If using this method, LEAs are encouraged to consider any recent or future potential changes to the LEA's homeless student population based on local, state, and national contexts (poverty levels, economic conditions, labor market, housing market, natural disasters, etc.).

- Matching the LEA EHCY funding amount
  LEAs receiving EHCY funds may reserve an amount equal to or greater as the homeless reservation amount, demonstrating a mutual and coordinated commitment across the LEA's EHCY and Title I, Part A programs to meet the needs of students experiencing homelessness.

- Reserving a percentage of the LEA Title I, Part A allocation
  LEAs may reserve a specific percentage of their Title I, Part A allocation as the homeless reservation amount. It may be helpful to leverage LEA poverty data to determine the specific percentage to reserve. This is an equitable way to ensure that as the LEA's Title I, Part A allocation fluctuates, so does the homeless reservation amount.

- Adjusting the previous year's reservation using available data
  LEAs may calculate their homeless reservation amount by starting with the previous school year's amount and adjusting it based on past expenditures, desired programming (a continuation of past effective programming and/or new programming based on identified student needs), and trend data. Trend data may include changes in the number of students identified as homeless by the LEA; the academic performance and educational needs of these students; and/or changes in the local, state, and national contexts (poverty levels, economic conditions, labor market, housing market, natural disasters, etc.). Consulting directly with the liaison regarding reservation adjustments needed year over year is recommended, given that the liaison is strategically positioned to understand LEA EHCY program goals, homeless education data trends, and unmet student needs.

Additional Resources

National Resource

- National Center for Homeless Education: *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*
  This work sheet provides questions to guide an initial conversation between LEA homeless liaisons and Title I, Part A coordinators concerning the needs of homeless students in the LEA. The LEA homeless liaison and Title I, Part A coordinator, along with other relevant staff or stakeholders, should meet to discuss the questions in the worksheet.

California Resources

- California Department of Education: *Title I, Part A Reservation Funds for Homeless Education*
  This overview is a reminder to LEAs regarding relevant legislation and strategies for implementing the allowable uses of Title I, Part A funds for students experiencing homelessness.

- California Homeless Education Technical Assistance Center (HETAC): Title I, Part A topical webpage This webpage links to a variety of resources related to supporting students experiencing homelessness under Title I, Part A, including the HETAC's suite of Title I, Part A resources and other national and state resources.

Concluding Thoughts: Stronger Together

LEAs with a legacy of joint investment in students experiencing homelessness across their EHCY and Title I, Part A programs find that their partnerships provide a collective impact that results in a return on investment for their individual programs and the children and youth they serve. LEAs are encouraged to use the information, recommendations, and resources in this tip sheet to build cross-program partnerships whose unified efforts lead to greater impact than what each program could accomplish alone.

References

Subtitle VII-B of the McKinney-Vento Homeless Assistance Act. 42 U.S.C. § 11431 *et seq*. https://uscode.house.gov/view.xhtml?path=/prelim@title42/chapter119/subchapter6/partB&edition=prelim

Title I, Part A of the Elementary and Secondary Education Act. 20 U.S.C. § 6301 *et seq*. https://uscode.house.gov/view.xhtml?path=/prelim@title20/chapter70/subchapter1/partA&edition=prelim

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