Allowable and Strategic Uses of Title I, Part A Homeless Reservation Funds

This California Homeless Education Technical Assistance Center (HETAC) tip sheet explores the Title I, Part A homeless reservation of funds, including

- allowable uses of homeless reservation of funds according to federal statute; and
- best practices for spending the Title I, Part A homeless reservation to maximize reach and impact.

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

- *Serving Students Experiencing Homelessness Under Title I, Part A*
- *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, including allowable uses of homeless reservation funds according to federal statute as well as best practices for spending the Title I, Part A homeless reservation to maximize reach and impact.

Allowable Uses of Homeless Reservation Funds

As shared in the HETAC's *Serving Students Experiencing Homelessness Under Title I, Part A* tip sheet, 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." Title I, Part A homeless reservation funds may be used to provide a wide variety of services to students experiencing homelessness, whether they attend a Title I, Part A or non-Title I, Part A school. These services may be greater in scope and intensity and/or different in nature than those provided to non-homeless students [20 U.S.C. § 6313(c)(3)(C)(ii)], including those required to be provided as services comparable to those received by students who attend a Title I, Part A school [20 U.S.C. § 6313(c)(3)(A)]. This flexibility in reservation funds usage acknowledges that students experiencing homelessness may face unique educational challenges and barriers beyond what are experienced by students from low-income families who are safely and stably housed.

Title I, Part A homeless reservation funds may be used to

- **support the homeless liaison position**, including paying the salary of the liaison, even if that person has no Title I, Part A duties [20 U.S.C. § 6313(c)(3)(C)(ii)(I)]; larger LEAs also may use reservation funds to support additional staff beyond the liaison who are carrying out liaison duties as listed in the McKinney-Vento Homeless Assistance Act;

- **pay the cost of transportation to and from the school of origin** [20 U.S.C. § 6313(c)(3)(C)(ii)(II)]; and
- **provide outreach services** to students living in shelters, motels, and other temporary residences [20 U.S.C. § 6313(c)(3)(A)(1)].

For a detailed list of additional allowable uses of the homeless reservation, please refer to the California Department of Education's *Title I, Part A Reservation Funds for Homeless Education* document.

In addition to the above list of allowable services, the U. S. Department of Education has provided two guiding considerations for the use of homeless reservation funds:

1. **The services must be reasonable and necessary** to assist students experiencing homelessness to take advantage of educational opportunities [20 U.S.C. § 6313(c)(3)(A); 2 C.F.R. § 200.403(a)].
2. **The funds must be used only as a last resort** when funds or services are not available from other public or private sources, such as the USDA's National School Lunch Program and Breakfast Program, public health clinics, or local discretionary funds (sometimes provided by the PTA) used to provide similar services for economically disadvantaged students [20 U.S.C. § 6315(e)(2)].

Homeless Reservation Spending Strategies: Considering Reach and Impact



As with calculating the reservation amount, expenditure decisions should reflect identified student needs and be based on a collaborative consultation across the Education for Homeless Children and Youths (EHCY) and Title I, Part A programs. LEAs are encouraged to consider a full range of options for how homeless reservation funds will be spent, including funding uses with the potential to provide the greatest impact on identified student needs and/or to address needs that are not readily addressed by other funding sources. Themes to reflect on include

- **increasing LEA capacity.** In an unpublished 2025 survey of California COE and LEA liaisons conducted by the University of California, San Francisco (n=437), 60% of liaisons reported spending 9 hours or less on liaison duties each week while 42% of liaisons responded that they felt like they did not have sufficient time to carry out their liaison duties. LEAs may find it strategic to use homeless reservation funds to increase their overall capacity to address the needs of children and youth experiencing homelessness. This may include paying all or part of the salary of the liaison and, particularly in larger LEAs, additional part- or full-time staff that support the LEA's EHCY program. Having sufficient staff capacity in the LEA EHCY program ensures that the liaison can implement the statutorily required liaison duties effectively and comprehensively and that children and youth receive all services for which they are eligible. Additionally, LEAs may use reservation funds to provide professional development to LEA and school staff on key homeless education issues. Topics may include recognizing the signs that a child or youth may be experiencing homelessness, understanding the educational rights of students experiencing homelessness, and connecting these students to school- and community-based supports.

- **supporting school attendance and stability.** For a student to benefit from the educational opportunities provided at school, they need to attend school regularly; and yet the challenges experienced by students experiencing homelessness outside of school often contribute to their disproportionately high levels of chronic absence. LEAs may use homeless reservation funds to support students' consistent school attendance and engagement, which may include providing transportation assistance and targeted

academic interventions (e.g. personalized academic advising and coaching, mentoring, and tutoring) to students experiencing homelessness as well as targeting outreach and messaging on the importance of school attendance to families experiencing homelessness.
Given the effect of high residential and school mobility on students' academic success, school stability (the right to continue attending the school of origin even if moving outside of the school's attendance area if in the student's best interest) is a hallmark of the McKinney-Vento Homeless Assistance Act. LEAs may use reservation funds to provide transportation to and from the school of origin to ensure that children and youth experiencing homelessness can stay in the same school, maintaining educational continuity and remaining with the same teachers and classmates.

- **supporting family and community engagement.** Parent engagement is a focus of both the EHCY and Title I, Part A programs and is associated with improved student attendance, academic performance, and social-emotional wellbeing. LEAs may use homeless reservation funds to enhance the engagement of caregivers of students experiencing homelessness through providing targeted outreach, hosting parent workshops focused on the unique needs of students and families experiencing homelessness, and developing awareness resources to share with caregivers about available school- and community-based services.
  LEAs also may use reservation funds to enhance community engagement which may include providing training and awareness resources to community partners about the educational rights and supports available to students experiencing homelessness.

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

Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. 2 C.F.R. § 200.400 *et seq.* https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200

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