

**Guidance on the Obligation of Federal Title I Part A
Funding for
Children Experiencing Homelessness**

Title I Law

All districts reporting homeless children and youth on the STARS will be required to set aside Title I funds to assist children and youth experiencing homelessness within district boundaries.

The law specifically addresses homelessness and the LEA's requirement in the following Title I, Part A regulations (Sec. 1113, c, 3 – Reservation):

“A local education agency shall reserve such funds as are necessary under this part to provide services comparable to those provided to children in schools funded under this part to serve

(A) homeless children who do not attend participating schools, including providing educationally related support services to children in shelters and other locations where children may live.”

Explanation of McKinney-Vento Funding under the No Child Left Behind Act

McKinney-Vento funding is also available to school districts through a competitive grant. Additional information on this competitive grant process can be accessed at www.dpi.state.nd.us/title1/homeless/grant/index.shtm on the department website.

Definition of Homelessness

Children eligible to benefit from the Title I homeless set-aside amount would include those children in situations that meet one of the following definitions:

1. **Shelters** – includes children and youth living in emergency shelters, transitional living programs, and children and youth awaiting foster care placement.
2. **Doubled-up** – sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason. This category includes children, youth, and unaccompanied youth who live with relatives, friends, boyfriends, girlfriends, etc., because they can not afford housing on their own.
3. **Hotels/Motels** – children, youth, and unaccompanied youth who are temporarily living in hotels and motels because they can not afford permanent housing.
4. **Unsheltered** – children and youth or unaccompanied youth who live in abandoned buildings or apartments, bus and train stations, airports, campgrounds, cars, parks, public spaces, dilapidated trailer parks, children abandoned in hospitals, and children and youth who live in substandard or inadequate housing.

Use of Funds

Title I, Part A funds set aside for homeless students can be used for any of the following:

1. To improve educational services for homeless children and youth by assisting children and youth in meeting social and academic challenges.
2. To provide homeless children and youth with the services needed to make a successful transition from their state of homelessness to school or employment.

3. To prevent homeless youth from dropping out of school, and to provide dropouts and children and youth with a support system to ensure their continuing education.
- * A more detailed breakdown of the allowable uses of Title I funds for assisting children and youth experiencing homelessness can be accessed at www.dpi.state.nd.us/title1/targeted/general/facts/setaside.pdf on the Title I Fast Facts entitled “Issue: Using your Title I Homeless Set Aside Funds.” Additional information on serving children and youth experiencing homelessness can be accessed at www.dpi.state.nd.us/title1/targeted/general/facts/homeless.pdf on the Title I Fast Facts entitled “Issue: Serving Homeless Children and Youth – the McKinney-Vento Act.”

Calculating Reservation of Set-Aside Funds

The NCLB Act states that a reservation of funds must take place as necessary to provide services to homeless children and youth and that these services must be comparable to the services the district provides to other students. The law does not specify a percent that must be used to determine the set-aside; however, reservation of funds must be reasonable and necessary and **must be determined on a calculated basis**. The following summarizes five options for districts to use to determine their set-aside amount.

1. Obtain a count of the number of children and youth experiencing homelessness as reported on the STARS and multiply this number by the Title I, Part A per-pupil amount on your targeting spreadsheet.
 2. Obtain a count of the number of children and youth experiencing homelessness as reported on the STARS and multiply this number by a minimum of \$500.00 per pupil identified.
 3. Reserve an amount of funds to support the McKinney-Vento grant request awarded to the facility (i.e., provide a supplemental amount of Title I, Part A funds to the homeless amount awarded).
 4. Reserve a specific percentage based on the district’s Title I, Part A allocation (i.e., a district may set aside between one and five percent of its total allocation).
 5. Identify the needs of homeless children and youth and then fund accordingly by determining a figure of how much it costs to pay for services to homeless children and youth (i.e., supplemental education services, materials and supplies for those services, costs associated with successful transition, etc.).
- * If no homeless children or youth were reported on the STARS for the 2011-2012 school year it is not mandatory that you set-aside Title I funds for homeless children. However, if at any time during the 2012-2013 school year a homeless child resides in the district, you are required by law to assist this child through the use of Title I funds and/or other district funding to provide services that are comparable to those provided to other children of the district to ensure the academic and social success of the child. A budget revision may be necessary to meet this requirement.

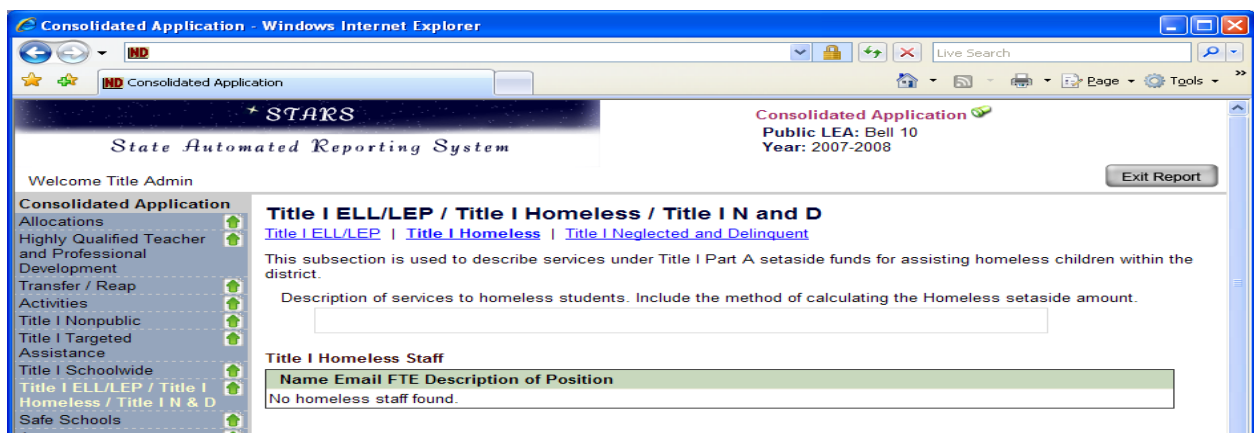
Reserving Set-Aside Funds

1. LEAs identifying homeless children and youth in their attendance area participate by setting aside funding of the top of their Title I allocation using one of the methods described above.
2. All districts obligating funds for homeless children and youth must thoroughly explain the use of funds and their intentions on the consolidated application. Under the ‘Activities’ section, ‘Title I District Admin’ set aside funding must be accounted for with an obligated activity or activities. For example, if you choose to spend additional funding for transitional services for homeless children and youth, then you will choose the appropriate activity from the list and obligate the estimated set-

aside under the appropriate object code. Be sure to thoroughly explain your district's intentions in the explanation section.



- The LEA must also complete the Homeless addendum section of the consolidated application. In the first section entitled "Description of services to homeless children and youth," include the method of calculating the homeless set-aside amount. The district should note the total amount of funding set-aside for the number of children and youth reported as homeless within the district and indicate how this set-aside funding was determined. In a second paragraph, the district must also specify how the district is assisting homeless children and youth with additional services, either through the use of these funds or through other programs within the district. If staff is being hired to assist children and youth at the local level, this information must also be entered under "Title I Homeless Staff."



Your assigned Title I staff member will be cross-checking the obligation of the funds generated for the homeless when reviewing the consolidated application.

Questions

For questions on the set-aside regulations, you may contact Jacki Harasym at jharasym@nd.gov or (701) 857-7770 or Laurie Matzke at lmatzke@nd.gov or (701) 328-2284. Additional resources on assisting children and youth experiencing homelessness can be accessed at www.dpi.state.nd.us/title1/homeless/resources/index.shtml on the Department of Public Instruction website.