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Technical Assistance Paper

Coordination of Title I, Part A Improving Basic Programs
Operated by Local Educational Agencies, and
Title X, Part C, McKinney-Vento Homeless Education Assistance Improvements Act of 2001
Education for Homeless Children and Youth Program

Summary:

Public Law (PL) 107-110 requires local educational agencies (LEAs) to reserve Title I, Part A funds as are necessary to provide homeless children and youth comparable services in non-Title I schools. Funds should be used to provide educationally related support services to children in shelters and other locations where children may live. This document provides guidance on the coordination between Title I, Part A and Title X, Part C programs.

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INTRODUCTION

This guidance outlines the Local Educational Agencies' (LEAs) requirements to reserve Title I, Part A funds as are necessary to provide homeless children and youth comparable services in non-Title I schools. Funds should be used to provide educationally related support services to children in shelters and other locations where homeless children may live. This document provides guidance on the coordination between Title I, Part A, and Title X, Part C programs and is non-binding. Although this document outlines specific requirements, the examples provided should not be regarded as exhaustive or limiting.

GENERAL INFORMATION

A-1. Who are homeless children and youth?

The McKinney-Vento Homeless Education Assistance Improvements Act of 2001 (from this point forward referred to as the McKinney-Vento Homeless Assistance Act), Public Law (PL) 107-110, Title X, Part C, Subtitle B, Sections 721-726, defines homeless children and youth as individuals who lack a fixed, regular, and adequate nighttime residence [Section 725(2)]. This includes:

- 1. Children and youth who are:
 - sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason (sometimes referred to as "doubled-up");
 - living in motels, hotels, trailer parks, or camping grounds due to lack of alternative adequate accommodations;
 - living in emergency or transitional shelters;
 - abandoned in hospitals; or
 - awaiting foster care placement.
- 2. Children and youth who have a primary nighttime residence that is a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.
- 3. Children and youth who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings.
- 4. Migratory children who qualify as homeless because they are living in circumstances described above.

Also included are:

- 1. Preschool-aged children who are eligible under the McKinney-Vento Act.
- 2. Homeless unaccompanied youth, which includes youth who are not in the physical custody of a parent or guardian [Section 725(6)]. This would include youth living in runaway shelters, abandoned buildings, cars, on the streets, or in other inadequate housing; youth denied housing by their families (sometimes referred to as "throwaway" youth); and school-aged unwed mothers living in homes for unwed mothers who have no other housing available.

If a youth's living situation does not clearly fall into the situations described above, the LEA should refer to the McKinney-Vento Homeless Assistance Act definition of "fixed, regular, and adequate nighttime residence" and consider the relative permanence of the living arrangements.

A-2. What is the purpose of Title I?

The purpose of Title I is to ensure that all children have a fair, equal, and significant opportunity to obtain a high-quality education and reach, at a minimum, proficiency on challenging state academic achievement standards and assessments.

Title I, Part A as it pertains to homeless children and youth, requires that funds be set aside to provide Title I-like comparable services to homeless children who do not attend Title I schools, including the provision of educationally related support services to children in shelters and other locations where children may live.

Title I, Part A specifically requires that:

- The State Educational Agency (SEA) desiring to receive funding under Title I, Part A submit a plan to the Secretary that is coordinated with the McKinney-Vento Homeless Assistance Act [Section 1111(a)(1)].
- Each LEA have on file with the SEA a plan, approved by the SEA, that is coordinated with the McKinney-Vento Homeless Assistance Act [Section 1112(a)(1)].
- Each LEA's Title I plan includes a description of the services that will be provided to homeless children, including services provided with reserved funds [Section 1112(b)(1)(O)].

A-3. What is the purpose of the McKinney-Vento Education for Homeless Children and Youth Program?

The McKinney-Vento Education for Homeless Children and Youth Program addresses the problems that homeless children and youth face in enrolling, attending, and succeeding in school. Under this program, SEAs must ensure homeless children or youth have equal access to the same free and appropriate public education as non-homeless students. Homeless students should have access to educational and other services that they need to enable them to meet the Next Generation Sunshine State Standards (NGSSS) to which all Florida students are held. In addition, homeless students may not be separated from the mainstream school environment.

The Florida Department of Education (FDOE) and LEAs are required to review and revise laws, regulations, practices, or policies that may act as barriers to the enrollment, attendance, or the academic success of homeless students. In Florida, this applies to all LEAs, including the 67 school districts and the four University Developmental Research Schools.

A-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 Elementary and Secondary Education Act. Assessments of homeless students are to be included in LEA or in

state accountability systems when students have been in a school for a full academic year. However, states are not required to disaggregate the assessment results of homeless students.

HOMELESS CHILDREN AND YOUTH ELIGIBILITY FOR SERVICES UNDER TITLE I, PART A

B-1. Are homeless students automatically eligible to receive Title I, Part A services in Title I schools?

Yes. Homeless students are automatically eligible for services under Title I, Part A whether or not they live in a Title I school attendance area, attend a Title I school, or meet the academic standards required of other children for eligibility.

This automatic eligibility acknowledges that the experience of homelessness puts children at significant risk of academic failure, regardless of their previous academic standing.

Additionally, each child who is homeless and attending any school in the LEA is automatically eligible for services in a targeted assistance school program [Section 1115(b)(2)(E)].

B-2. Are homeless students who attend non-Title I schools eligible to receive Title I, Part A services?

Yes. The LEA must provide comparable services to homeless students who do not attend Title I schools. The LEA must reserve funds for homeless students 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 in effectively taking advantage of educational opportunities. However, funds received under Title I, Part A may not be used to provide services such as transportation to the school of origin that are otherwise required by the McKinney-Vento Homeless Assistance Act to be made available to homeless children and youth, but may be used to coordinate or supplement such services.

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 (Section 1113, PL 107-110).

B-3. What is meant by comparable services?

Comparable services are Title I-like services offered to homeless students. These services include public preschool programs, educational programs, or supplemental services for which a homeless student is eligible. Programs such as career education, gifted, before-and after-school, and school nutrition programs and transportation services are considered comparable services.

B-4. Are homeless children eligible for participation in a Title I-supported preschool program?

Children who participated in a Head Start, Even Start, Early Reading First, or Title I preschool program at any time during the two preceding years, homeless children, and children in institutions for neglected or delinquent children are automatically eligible for Title I preschool [PL 107-110, Section 1115(b)(2)(B)].

B-5. If homeless students become permanently housed during a school year, are they eligible to receive Title I, Part A services for the remainder of the school year?

Yes. In general, homeless students who become permanently housed during a school year continue to remain eligible for Title I, Part A services for the remainder of that school year. This helps ensure educational stability for formerly homeless children.

COORDINATION AND COLLABORATION BETWEEN TITLE I, PART A AND TITLE X, PART C

C-1. Why is it important for Title I and Title X program staff to have an ongoing collaboration?

The No Child Left Behind Act requires that LEA Title I plans include a description of how those plans are coordinated with the McKinney-Vento Homeless Assistance Act [Section 1112(a)(1), PL 107-110]. LEA plans must describe services provided to homeless children. Coordination of services results in the most effective use of resources, ensuring that the needs of students experiencing homelessness are addressed in a comprehensive and integrated fashion. Title I coordinators and local homeless liaisons should communicate and collaborate on an ongoing basis to identify the needs of homeless students, review resources, and plan ways to address identified needs.

The following are strategies to help facilitate collaboration between the Title I and McKinney-Vento programs:

- Develop systems to facilitate cross-program collaborations on local plans for both Title I and McKinney-Vento programs.
- Articulate clearly how the Title I coordinator and local homeless liaison will work together to determine the use of set-aside funds and how the liaison will be able to access Title I, Part A set-aside funds.
- Provide Title I and McKinney-Vento personnel with cross-program trainings and materials.
- Collect and share data across programs on the needs of homeless and other low-income students, along with information on effective programs to address these needs.
- Involve homeless education personnel in the creation of schoolwide Title I program plans, targeted assistance program plans, and school improvement plans. This should ensure that the needs of homeless students are addressed within those plans.
- Locate Title I and homeless education program offices near one another.
- Include homeless parents in Title I parental involvement policies and create opportunities for homeless parents to be involved.

C-2. Is every LEA in Florida required to designate a local liaison for homeless students?

Yes. Every LEA, whether or not it receives a McKinney-Vento subgrant, is required to designate a local homeless liaison.

C-3. What are the duties of the local homeless liaison?

Section 722(g)(6) of the Act requires that the local homeless liaison ensure:

- 1. Homeless children and youth, including unaccompanied youth, are identified by school personnel and through coordinated activities with other entities and agencies.
- 2. Homeless children and youth enroll in, and have a full and equal opportunity to succeed in, schools of that LEA.
- 3. Homeless families, children, and youth receive educational services for which such families, children, and youth are eligible, including Head Start, Even Start, and other preschool programs administered by the LEA, and referrals to health care services, dental services, mental health services, and other appropriate services.
- 4. The parents or guardians of homeless students are informed of the educational and related opportunities available to their children and are provided with meaningful opportunities to participate in the education of their children.
- 5. Public notice of the educational rights of homeless children and youth is disseminated where such children and youth receive services under this Act, such as schools, family shelters, and soup kitchens.
- 6. Enrollment disputes are mediated.
- 7. The parents or guardians of homeless students, or any unaccompanied youth, are fully informed of all transportation services, including transportation to the school of origin, and are assisted in accessing transportation to the school of origin or the school which serves the location where the students currently reside.

Additional requirements are that the:

- 1. Local homeless liaison coordinates and collaborates with the state Homeless Education Coordinator and community and school personnel responsible for providing education and related services to homeless students; and
- 2. LEAs inform school personnel, service providers, and advocates working with homeless families of the duties of the local homeless liaison.

TITLE I, PART A SET-ASIDE REQUIREMENTS/RESERVATION OF FUNDS

D-1. Who decides how the Title I, Part A set-aside for homeless students will be calculated and how the funds will be used?

Determining the amount of the Title I, Part A set-aside and how the funds will be used should be a coordinated process involving the Title I coordinator, the local homeless liaison, and other appropriate LEA personnel.

D-2. Is there a formula for calculating Title I, Part A set-aside?*

No. There is no mandated formula for determining the Title I, Part A set-aside. However, the set-aside must be sufficient to provide comparable services to students attending non-Title I schools. Therefore, the set-aside must be based on the number and needs of homeless students in the LEA.

Possible methods to calculate the set-aside include:

- Identify and assess the needs of students in homeless situations in the LEA, and set aside funds accordingly.
- Obtain the count of homeless students identified and multiply it by the Title I, Part A per-pupil allocation.
- For LEAs with a McKinney-Vento subgrant, reserve an amount greater than or equal to the LEA's McKinney-Vento funds.
- Reserve a specific percentage based on the LEA's poverty level or total Title I, Part A allocation.

D-3. May an LEA reserve funds off the top of its Title I allocation before it allocates funds to participating public school attendance areas or schools?

Yes. Before allocating Title I funds to participating public school attendance areas or schools, an LEA must reserve funds from its Title I allocation "off the top" for specific purposes, as necessary. One of these purposes is to provide services for homeless children, as appropriate.

D-4. Is it a requirement for all LEAs, including the Florida School for the Deaf and Blind and the University Developmental Research Laboratory Schools, to set-aside funds for homeless students?

LEAs must reserve Title I funds as are necessary to provide services comparable to those provided in Title I schools to serve homeless children attending non-Title I schools. The Florida School for the Deaf and Blind and the University Schools, except Florida Atlantic University and Florida State University, are a single LEA and school. There is no need to reserve funds at these schools because services are already provided through Title I, Part A.

D-5. May the Title I, Part A set-aside funds be used to support supplemental social services?

The Title I, Part A set-aside funds should support additional educational services and, as needed, supplemental social services (when other means of providing such services have been exhausted). If funds for social services are not reasonably available from other public or private sources, then Title I, Part A dollars may be used as a last resort to fund these services, based on documented needs [Section 1115(e)(2)]. Expenditures must be linked to the child's educational needs. Please see the following scenarios.

^{*} Calculation methods excerpted from "Four Methods for Determining New Mandatory Title I, Part A Set-Aside for Homeless Children." *No Child Left Behind Financial Compliance Insider* (Nov. 2003).

Scenario 1

The LEA is serving all schools (elementary, middle, high, charter) within the LEA. It is not required to reserve funds due to the fact that there are no non-Title I schools in the LEA. However, if it is determined that a homeless student's education is being hampered due to his or her need of services, such as the purchase of eyeglasses or other health-related items or other social services, etc., and other sources to meet these needs have been exhausted, then the LEA should provide such services to a homeless student (whether the homeless student is in a Title I school or not).

Scenario 2

The LEA has 20 schools and is only serving ten (10) schools. The LEA must reserve Title I funds, as required under Section 1113, to provide additional educational and support services for homeless students in the schools not being served.

Scenario 3

The LEA is only serving students through a targeted assistance model. Homeless students are automatically eligible to receive Title I services regardless of whether the school is using a targeted assistance model. The LEA must set aside funds to serve homeless students in non-Title I schools based on their needs.

D-6. Is it a requirement for LEAs that receive McKinney-Vento funds (subgrantees) to set-aside funds for homeless students?

Regardless of whether LEAs receive McKinney-Vento funds, they must reserve Title I funds, as necessary, to provide services to homeless children in non-Title I schools that are comparable to those provided to children in Title I schools.

D-7. Is it a requirement for LEAs to set aside funds if no homeless children have been identified by the LEA?

If the LEA has not identified homeless children, it is not required to set aside Title I, Part A funds, provided it has followed McKinney-Vento Homeless Assistance Act requirements for outreach and identification.

D-8. Many of the services purchased by the homeless set-aside funds require the LEA to first seek other resources. How does the LEA know if it has exhausted other resources and how should this be documented?

This would vary depending on the availability of resources in the LEA. The LEA should make a reasonable attempt to utilize other resources. If the LEA has attempted to do so and is still unsuccessful in securing other resources, the LEA should document its outreach and inabilities to utilize other resources.

SERVICES PROVIDED TO HOMELESS CHILDREN AND YOUTH WITH TITLE I, PART A SET-ASIDE FUNDS

E-1. What types of services may the LEA provide to homeless students with funds reserved under Section 1113(c)(3)?

The LEA may use funds reserved under this section to provide services to eligible homeless students in non-Title I schools that are comparable to services provided to students in Title I schools. Services provided should assist such children in meeting the NGSSS.

The LEA also 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.

E-2. May the Title I, Part A set-aside be used to fund the homeless liaison and other LEA-level activities?

The Title I, Part A set-aside may fund, in part, the salary of the homeless liaison. However, Title I, Part A funds may not be used to fund 100 percent of the salary of the homeless liaison if this individual's position is 100 percent dedicated to the duties of the homeless liaison.

As referenced above, the Title I, Part A set-aside may be used to support the homeless liaison position, to allow the liaison to dedicate more time to McKinney-Vento Homeless Assistance Act activities, or to hire additional staff to support identification and professional development.

E-3. May the Title I, Part A set-aside be used to hire special teachers, aides, and tutors to provide supplemental instruction to homeless students at risk of failing to meet academic standards?

Yes. The use of the set-aside to hire special teachers, aides, and tutors to provide supplemental instruction, in shelters and other appropriate locations to homeless students is allowable.

E-4. May the Title, I Part A set-aside be used to hire staff for summer employment at shelters?

Yes. If the LEA wishes to hire tutors to work at the shelter during the summer months, this would be an allowable expense. However, this must be approved by the FDOE as an item in the budget for the current fiscal year.

E-5. May the Title I, Part A set-aside be used to pay the cost of transporting homeless students to their school of origin?

No. Transporting homeless students to and from their school of origin is a requirement under the McKinney-Vento Homeless Assistance Act; therefore, Title I, Part A funds cannot be used for this service. Doing so would be considered supplanting one source of federal funds for another source of federal funds. However, once homeless students become permanently housed, Title I, Part A funds may be used to transport the students back to the school of origin for the remainder of the school year.

LEAs that receive McKinney-Vento funds may only use the McKinney-Vento funds for the excess cost of transporting a child back to the school of origin.

E-6. May the Title I, Part A set-aside be used to offer parental involvement activities and transport parents of homeless students to activities such as parent/teacher conferences, school meetings, school plays, etc.?

Yes. Parental involvement activities that target parents in homeless situations are strongly encouraged and may be supported with the Title I, Part A set-aside. For example, the LEA may hire a teacher to train parents at the shelter on how to assist their children with effective reading techniques.

The NCLB Parental Involvement Non-Regulatory Guidance stipulates that, in an effort for LEAs and schools to maximize parental involvement and participation in school meetings, conferences, and activities, schools may pay reasonable and necessary expenses associated with local parental involvement activities, including transportation and childcare costs, to enable parents to participate in school-related meetings and training sessions. Schools and LEAs should also arrange school meetings at a variety of times. In addition, for parents who are unable to attend school conferences, schools may arrange for and conduct in-home conferences between teachers or other educators who work directly with participating children and their parents. Schools also may provide training to parents on how to enhance the involvement of other parents [Section 1118(e)(8), (9), and (10), PL 107-110].

E-7. May the Title I, Part A set-aside be used to pay transportation costs to transport homeless students to their residences after a tutoring or extended-day school program?

Yes. However, if the LEA provides for the transportation of students after such activities with state and local funds, they would not be able to pay transportation costs with Title I, Part A funds.

E-8. May the Title I, Part A set-aside be used for services that are not directly related to education?

If funds for social services are not reasonably available from other public or private sources, then the Title I, Part A set-aside may be used as a last resort to fund these services, after the need has been documented. Examples provided within the law include using Title I, Part A funds to purchase eyeglasses; pay for health, nutritional, and other social services; or provide specialized professional development. Expenditures must be linked to the child's educational needs.

E-9. May the Title I, Part A set-aside be used to pay for rent for the purposes of temporary lodging until a homeless family or youth finds housing?

No. It is recommended that the local homeless liaison work with social service agencies such as the Florida Supportive Housing Coalition or Continuum of Care to provide referrals to homeless families and youth.

E-10. May the Title, I Part A set-aside be used to pay for utilities?

No. The Title I, Part A set-aside may not be used to pay for utilities.

E-11. May the Title I, Part A set-aside be used to pay for outreach services to children and youth living in shelters, transitional living programs, motels, and other temporary residences?

Yes. The set-aside may used to pay for outreach services to students living in shelters, motels, and other temporary residences, to help identify homeless children and youth and advise them of available school programming and their rights.

E-12. May the Title I, Part A set-aside be used to pay for counseling services?

Yes. The set-aside may be used to pay for counseling services. Homeless students may not be able to focus on their studies due to the stress and anxiety associated with their homelessness. They may benefit from school counseling services. Local educational agencies may use these funds to support a school psychologist or social worker.

E-13. May the Title I, Part A set-aside be used to pay for graduation robes or class rings for homeless students?

A class ring is not necessary to improve educational outcomes nor does it assist a child in meeting the state's academic achievement standards. Therefore, it would not be an allowable use of the Title I, Part A funds.

With regard to graduation robes, the answer is more nuanced. If the LEA requires students to wear a graduation robe to participate in graduation activities, or if graduation robes are not required, but virtually all students wear them, then generally, Title I, Part A funds may be used. However, if the district has a policy to provide a graduation robe for any student who cannot afford to rent or buy one, then this policy should also apply to homeless students. For example, if the district has a fund to provide graduation robes for low-income students, this fund, not Title I, Part A funds, should be used to provide a graduation robe for students experiencing homelessness.

E-14. May the Title I, Part A set-aside be used to pay for clothing for homeless students?

The LEA, at its discretion, may provide a student with an item of clothing to meet a school's dress or uniform requirement so that such student may effectively take advantage of educational opportunities.

E-15. May the Title I, Part A set-aside be used to pay the cost of drivers licensing test fees? For example, if a homeless youth needs a drivers license to get to his/her after-school job so he can earn money to pay his/her rent, can the set-aside be used?

This is not an allowable expense under Title I, Part A or Title X, Part C.

E-16. May the Title I, Part A set-aside be used for fees to enable students experiencing homelessness to participate in extracurricular activities after school such as band, sports, cheerleading, dance, etc.

This is not an allowable expense under Title I, Part A. However, if the LEA receives funding for Title X, Part C, this would be an allowable expense as long as it has been approved in the original

budget or budget amendment. Local educational agencies should first seek other means to obtain funds for these activities.

In the McKinney-Vento Homeless Assistance Act, the terms "enroll" and "enrollment" include "attending classes and participating fully in school activities" [Section 725(1), PL 107-110]. Being able to participate in sports, cheerleading, and music programs are generally very important to homeless youth and may impact their school engagement. Local homeless liaisons should coordinate and collaborate with community and business partnerships, school booster clubs, or parent-teacher associations, to assist with these costs, so that McKinney-Vento subgrant funds may be used for other types of activities listed in the Act.

E-17. May the Title I, Part A set-aside be used for educationally related field trips?

Yes. However, it is strongly encouraged that other funds or sources be used for this purpose, if available. In addition, the LEA should document how the field trip relates to the NGSSS.

E-18. May the Title I, Part A set-aside be used for after-school and/or educationally related summer programs?

Yes. The set-aside may be used for after-school and/or educationally related summer programs.

E-19. May the Title I, Part A set-aside be used to tutor homeless GED students?

Yes. The set-aside may be used to tutor high school GED students given that the homeless student is in the age range to be served. The McKinney-Vento Homeless Assistance Act and Title I applies to children and youth age 21 and under, consistent with their eligibility for public education services under state and federal laws. Furthermore, under the federal Individuals with Disabilities Education Act, special education students are provided the right to access services until age 22, with the exception of students with disabilities who are incarcerated as adults and students with disabilities who have earned a high school diploma.

Florida Statutes do not specify a maximum age a student may attend school in Florida. That decision is determined at the district level. However, compulsory attendance is through age 16 (Section 1003.21 Florida Statutes).

E-20. May the Title I, Part A set-aside funds be used to serve homeless students in middle or high school if the LEA typically uses these funds for elementary schools?

Yes. The purpose of the homeless set-aside funds is to serve students experiencing homelessness who are not attending Title I schools. Targeting grade levels not served by Title I is also an appropriate use of this reservation of funds.

E-21. May the Title I, Part A set-aside be used to collect data on students experiencing homelessness as part of the overall LEA data collection system?

Yes. The set-aside may be used to collect data on homeless students.

REFERENCES

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, Non-Regulatory Guidance. (July 2004). Washington, D.C.: United States Department of Education.

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McKinney-Vento 2001-Law into Practice: Title I and Homelessness. (Spring 2006). National Center for Homeless Education.

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APPENDIX A

COMPARISON OF PROGRAM REQUIREMENTS

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ъ	Schoolwide	Targeted Assistance
Provision	Program Requirements	Program Requirements
Eligibility	Schools with at least 40% poverty	Any school in the LEA down to 35% poverty or the LEA poverty average, whichever is less, is eligible. Schools conducting the year-long schoolwide planning process may also choose to operate a targeted assistance program.
Identification of Students	None	Schools must use multiple, educationally related, objective criteria to identify eligible students to receive Title I services.
Delivery of Supplemental Instructional Support Services	All students in a schoolwide program are eligible to receive services.	Only the most educationally needy students and those who participated at any time in the two preceding years in Head Start, Even Start, Early Reading First, migrant education, or those students that are neglected, delinquent, or homeless may receive services.
Plans	Schoolwide plans must include the required ten components.	Targeted assistance plans must include the required eight components.
Highly Qualified Teachers	All teachers must be highly qualified.	All teachers must be highly qualified.
Highly Qualified Paraprofessionals	All instructional paraprofessionals working in a schoolwide program must be highly qualified.	All instructional paraprofessionals who are paid with Title I funds must be highly qualified.
Parent Involvement	Parent involvement activities must be conducted for all parents. All parents must receive statutorily required notifications.	Parent involvement activities must be conducted for parents of participating students. All parents must receive statutorily required notifications.
Professional Development (in accordance with Section 1119)	All teachers in a schoolwide program may participate in Title I-funded professional development.	Priority for Title I-funded professional development activities must be given to Title-I funded teachers.
Services to Preschool Students	If a preschool program is part of a Title I schoolwide school, identification of children to receive services is not necessary. All teachers and paraprofessionals must meet the highly qualified requirements of PL 107-110, Section 9101(23).	Only the most educationally needy children may be selected to receive services in a preschool program Title I targeted assistance school. All teachers and those paraprofessionals funded with Title I must meet the highly qualified requirements of PL 107-110, Section 9101(23).
Control of Property	The LEA must maintain appropriate controls over equipment purchased with Title I funds.	The LEA must ensure that only Title I-participating students use equipment purchased with Title I funds, unless use by ineligible students does not interfere with the Title I program and does not decrease the value of the equipment.

Source: Providing Title I Services in Schoolwide and Targeted Assistance Programs Technical Assistance Paper. (October 2007). Florida Department of Education