**UPDATED GUIDANCE FOR 2014-15**

**Coordination Between Title I and McKinney-Vento**

**Services to Homeless Students**

**Q & A**

**Michigan Department of Education**

**Office of Field Services**

**Purpose Statement:** This Question and Answer (Q&A) document provides clarification of the Title I, Part A requirements for support to the children and youth experiencing homelessness. Information in this document also serves to assist districts in implementing required coordination efforts between Title I and McKinney-Vento legislation and services.

**Updates / changes to this guidance are highlighted in bold in this document.**

**THE CONSOLIDATED APPROPRIATIONS ACT OF 2014 APPLIES TO ALL PUBLIC SCHOOLS, REGARDLESS OF:**

* **TITLE I FUNDING STATUS**
* **TITLE I BUILDING STATUS**
* **NUMBER OF HOMELESS STUDENTS IDENTIFIED**
* **MV GRANT CONSORTIUM MEMBER STATUS**

**SUMMARY OF UPDATES, based on the 2014 Consolidated Appropriations Act:**

* **As of the 2014-15 school year, LEA Title I Homeless Reservations may be used for transportation of homeless students to their schools of origin, once the student is permanently housed.  This would continue through the remainder of the current school year.**
* **Districts’ Comprehensive Needs Assessments must consider transportation of homeless students as one of the LEA needs.**
* **As of the 2014-15 school year, MV Homeless Education Liaisons can be paid up to 100% with Title I funds, even without other Title I duties, since ALL homeless students are categorically Title I students.  Please note that this must be included in the regular salaries Title I funding, not in the homeless reservation, and will count toward the district’s 10% administrative cap under function code 226.**

**The USED Guidance (3-21-14) associated with this legislation states -**

**“… under ESEA section 1115(b)(2)(E), homeless children and youth who attend any school served by a local educational agency (LEA), regardless of whether the school receives Title I funds, are eligible to receive Title I services. To ensure that resources are available for this purpose, ESEA section 11113(c)(3)(A) requires an LEA to reserve from its Title I allocation ‘such funds as are necessary’ to provide to homeless children and youth who attend non-Title I schools ‘services comparable to those provided to children in schools’ funded under Title I. Therefore, an LEA must annually determine an appropriate reservation among and uses for that reservation in order to provide comparable services. An LEA can do so through a comprehensive needs assessment or other similar approach.”**

**Q1. How does a district define a homeless student?**

**A1.** The district must use the definition of homeless as found in the McKinney-Vento legislation (Title X, Part C of the ESEA).

For purposes of this subtitle:

(1) The terms ‘enroll’ and ‘enrollment’ include attending classes and participating fully in school activities.

(2) The term `homeless children and youths’--

(a) Means individuals who lack a fixed, regular, and adequate nighttime residence (within the meaning of section 103(a) (1)); and

(b) Includes:

(i) children and youths who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; are abandoned in hospitals; or are awaiting foster care placement;

(ii) children and youths 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 (within the meaning of section 103(a)(2)(C));

(iii) children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and

(iv) migratory children (as such term is defined in section 1309 of the Elementary and Secondary Education Act of 1965) who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (i) through (iii).

[McKinney-Vento, Sec. 725(1)(2)]

**Q2. When determining the Title I required reservation for homeless students, do districts count only the homeless students in non-Title I schools?**

**A2.** Title I legislation states that a local educational agency (LEA) “shall reserve Title I funds as are necessary to provide services to homeless children not attending Title I schools comparable to those services provided to children attending Title I schools.” It is important to remember, however, that all homeless students in Title I schools (targeted assistance as well as schoolwide) are eligible for Title I services. See also Q&A 7 information on “anticipated costs” for homeless students.

[Title I Sec. 1113(c)(3)(A)]

**“…homeless children and youth who attend a Title I schoolwide program school would be included in the school’s needs assessment and benefit from the education program designed to address those needs.**

**“Homeless children and youth who attend a Title I targeted assistance school are ‘automatically’ eligible for Title I services. This eligibility is based on their status as homeless and is not dependent on low academic achievement. Whether homeless children and youth are determined to be most in need of Title I services would depend on the relative needs of all eligible children in a targeted assistance school. In making those determinations, a school might decide that homeless children and youth have greater needs because they face problems, for example, of attendance and homework completion due to recurrent moves and, therefore, may be at greater risk of failure than other children who are not faced with the disruption associated with homelessness.”**

**[USED Guidance, 3-21-14]**

**Q3. How does the district determine the appropriate reservation for homeless students attending non-Title I schools?**

**A3. “… a LEA must annually determine an appropriate reservation amount and uses for that reservation in order to provide comparable services.”**

**[USED Guidance, 3-21-14]**

Even though a district can determine its own formula for calculating the homeless reservation, four **federally-approved** methods are available for consideration in collaboration with district homeless education liaison or additional stakeholders **(in LEAs where the Federal program coordinator and homeless education liaison is the same person)**:

**Method 1: Identify count of homeless students in non-Title I buildings and de****termine a “reasonable and necessary” amount to provide academic support to all homeless students, OR to provide academic support and other educationally related services to all homeless students.**

**Method 2: Identify count of homeless students in non-Title I buildings and multiply by the district’s Title I, Part A per pupil allocation or by the average per pupil allocation.**

**Method 3: Identify count of homeless students in non-Title I buildings and reserve a specific percentage based on the district’s poverty level or total Title I, Part A allocation.**

**Method 4: Identify count of homeless students in ALL buildings and reserve an amount of funds greater than or equal to the amount of a district’s portion of the McKinney-Vento Consortium sub-grant (if funds are allocated to districts in your consortium). An LEA may NOT use McKinney Vento Funds for this purpose.**

Whatever method the district chooses, the Michigan Department of Education (MDE) Office of Field Services (OFS), recommends the following preliminary action steps so that requirements for coordination between Title X-McKinney-Vento and Title I are in compliance.

**Step 1: Identification of Homeless Students**

The staff person identified by the district as its McKinney-Vento Homeless Education Liaison must follow the McKinney-Vento legislation Sec. 722(g)(6) to identify the homeless students and as described in Q&A 1. The identification process consists of identification through school personnel and through coordination activities with other entities and agencies in the community.

**Step 2: Needs Assessment Analysis**

Based on the district’s comprehensive needs assessment (CNA), the data related to homeless student needs (academic, pupil support services, and non-academic) are analyzed. The district’s homeless education liaison should participate in the data analysis along with other stakeholders involved in the CNA process. **The needs of homeless students MUST be included in the district’s CNA.**

**“An LEA can do so through a comprehensive needs assessment or other similar approach. As part of this process, the LEA should involve the homeless liaison required under section 722(g)(1)(J)(ii) of McKinney-Vento, especially given the critical role the liaison plays in coordinating services to ensure that homeless children and youth have the opportunity to succeed academically.”**

**[USED Guidance, 3-21-14]**

**Step 3: Comparable Services as a Basis for Homeless Reservation**

The reservation for homeless students attending non-Title I schools must first, be based on the identified services provided to ALL Title I students and second, may also be based on additional **educationally-related** services for homeless not typically offered to all Title I students. “Comparable services” for homeless students attending non-Title I schools are then based on how the district chooses to provide services in its Title I schools.

**Example 1.** If a district provides only academic support to its Title I students, and chooses not to include additional services for homeless students in its Title I schools because those services are available from funding sources other than Title I, then “comparable services” for homeless students attending non-Title schools **may be** limited only to academic support.

**Example 2.** If a district chooses to not only provide academic support for its Title I students but also provides additional services (from Title I) for homeless students not typically offered to all Title I students, then the combination of services is defined as, “comparable services.” If a district does choose to include additional services from Title I for homeless students as part of its “comparable services,” the following information must first be considered:

**The homeless education liaison is responsible for coordinating or obtaining McKinney-Vento and Community resources for the homeless students and communicating their availability to the Title I contact. Title I funds may be considered only after it has been determined that there is no supplanting of other state, federal or LEA funds.**

**Step 4: Documenting the Reservation Method / Formula**

Districts are required to have the homeless formula on file. (See Q&A 3 for list of suggested methods to determine a formula.) Included in the documentation must be a written rationale that supports the method selected to develop the homeless reservation formula.

[Title I Sec. 1113, 1114, 1115 and USED communication to MDE]

**Q4. What are allowable Title I costs?**

**A4.** There are **now FOUR** types of allowable costs:

1. Educationally-related services for ALL Title I students, and
2. Educationally-related services **not** typically allowable for ALL Title I students, but in certain circumstances may be allowable for homeless students**, and**

**3) Salary to support a LEA Homeless Education Liaison. The USED guidance for 2014-15 will include items first allowed under the Title I, Part A, ARRA Guidance, Sept. 2009. Please note that this must be included in the regular salaries Title I funding, not in the homeless reservation, and will count toward the district’s 10% administrative cap under function code 226.**

**4) Transportation to and from the school of origin for homeless students who obtain permanent housing during a school year.** Allowable costs for homeless students in non-Title I schools that are generally considered comparable services for ALL Title I students include academic services such as tutoring during the school day, extended day, summer school; transportation costs back home from a Title I funded tutoring program after school. [Title I Sec. 1115]**, as well as to the school of origin once a student has obtained permanent housing (“fixed, regular and adequate nighttime residence”).**

**[USED Guidance; Title I ARRA, Sept. 2009, Item G-11; USED Guidance, McKinney-Vento Homeless Education, July 2004, Item M-2; Consolidated Appropriations Act of 2014; USED Guidance 3-21-14]**

1. Allowable pupil support services include:

* Supplemental social work or counseling services
* Health related services for ALL Title I students may be allowed if funds are not reasonably available from public or private sources. Then, health, nutrition and other social services may be provided, such as the provision of basic medical equipment including eyeglasses and hearing aids, student’s school related nutritional needs, immunizations and, dental needs.

[Title I Sec. 1115(e)(2)(A)(B)(i); **USED Guidance, Title I ARRA, Sept. 2009, Item G-11; USED Guidance, McKinney-Vento Homeless Education, July 2004, Item M-2; Consolidated Appropriations Act of 2014; USED Guidance 3-21-14**]

1. Educationally-related services **not** typically allowable for ALL Title I students may be allowable for homeless students to ensure that they can participate in required academic activities are listed below. Items of clothing to meet a school’s dress or uniform requirement

* Clothing and shoes necessary to participate in physical education classes
* Student fees that are necessary to participate in the general education program
* Personal school supplies such as backpacks and notebooks
* Birth certificates necessary to enroll in school
* **Immunizations**
* **Counseling services to address anxiety related to homelessness that is impeding learning**
* **Outreach services to students living in shelters, motels, and temporary residences**
* **Extended learning time (before and after school, Saturday classes, summer school) to compensate for lack of quiet time for homework in shelters or other overcrowded living conditions**
* Tutoring services, especially in shelters or other locations where homeless students live
* Parental involvement specifically oriented to reaching out to parents of homeless students
* Fees for SAT / ACT testing (third attempt)
* Cost of GED for an unaccompanied youth
* Costs for attaining a GED for parents participating in Head Start**, Great Start** or Even Start
* Graduation cap and gown

**[USED Guidance, Title I ARRA, Sept. 2009, Item G-11; USED Guidance, McKinney-Vento Homeless Education, July 2004, Item M-2; Consolidated Appropriations Act of 2014; USED Guidance, 3-21-14]**

Non-allowable Title I costs:

* Physicals for sports participation
* Clothing for student’s parents
* Money for housing
* Prom dress**/tuxedo**
* **Daily school** transportation, except as described in McKinney-Vento Guidance**, M-2, this updated MDE Guidance, and the USED Guidance, 3-21-14.**

1. **Title I, Part A funds may now be used (up to 100%) to support a LEA homeless education liaison, whether or not the staff performs other Title I duties. All homeless students are categorically eligible for Title I services, so serving those students is considered a Title I-A activity.**

**“Prior to the FY2014 appropriations language, ED indicated that, because the highlighted language specifically permits anther Federally funded coordinator to perform these duties, that an individual paid, in whole or in part, with Title I funds may serve as a homeless liaison in addition to his or her title I duties. Consistent with the appropriations language cited above, an LEA may use funds from its FY2014 Title I grant (and, consistent with GEPA section 425(b), Title I carryover funds) to fund all or part of the homeless liaison’s salary even if that person has no Title I duties.”**

**[USED Guidance, 3-21-14]**

**\*NOTE THAT FUNDING FOR THIS POSITION IS TO COME FROM THE REGULAR SALARIES TITLE I ALLOCATION, NOT FROM THE HOMELESS RESERVATION. Be aware that this administrative position (under function code 226) will count toward the LEA’s 10% administrative cap for Title I, Part A funds.**

1. **“Absent the FY 2014 appropriations language, an LEA may not use Title I funds to transport homeless children and youth while they are homeless to and from their school of origin. Because transportation services to and from the school of origin are mandated under McKinney-Vento, even if an LEA does not receive McKinney-Vento funds, the supplement not supplant provisions in Title I prohibit the LEA from using Title I funds to support activities that the LEA would otherwise be required by law to provide.**

**“The FY 2014 appropriations language, however, specifically authorized an LEA to use FY 2014 Title I funds (and consistent with GEPA section 425(b), Title I carryover funds) to pay transportation costs associated with transporting homeless children and youth to and from their school of origin. These allowable costs are the incremental costs to transport a homeless child or youth to his or her school of origin above what the LEA would otherwise provide to transport the student to his or her assigned school.”**

**[USED Guidance 3-21-14]**

**Q5. Who would be responsible for coordinating and obtaining the educationally-related resources for homeless students not typically allowed for all Title I students?**

**A5.** It is a district decision as to who would coordinate and obtain these resources for homeless students but it is recommended that the district homeless education liaison assume this responsibility as part of the required coordination efforts between McKinney-Vento and Title I, keeping in mind that the responsibilities of the local liaison include serving as one of the primary contacts between homeless families and school staff, district personnel, shelter workers, and other service providers.

[MDE/OFS decision and McKinney-Vento Guidance]

**Q6. Is a homeless reservation required if homeless students in non-Title I schools do not require academic services and additional costs, if applicable, are already funded through district policies, a McKinney-Vento regional grant and/or community and private resources?**

**A6.** Title I legislation and regulations state that the LEA shall reserve funds “as reasonable and necessary to meet the needs of homeless students.” **Considering the impact of homelessness on academic outcomes of students, all identified homeless students should be considered for Title I academic support services.**  If homeless students in non-Title I schools do not **need** academic services and additional educational needs are met through other sources, a reservation for academic services is not **required.** The district would need documentation on file as evidence **of the academic performance of homeless students**, and would need to complete the appropriate Homeless Template and upload as an attachment to the Consolidated Application.

[MDE decision based on USED communication]

**“…homeless children and youth who attend a Title I schoolwide program school would be included in the school’s needs assessment and benefit from the education program designed to address those needs.**

**“Homeless children and youth who attend a Title I targeted assistance school are ‘automatically’ eligible for Title I services. This eligibility is based on their status as homeless and is not dependent on low academic achievement. Whether homeless children and youth are determined to be most in need of Title I services would depend on the relative needs of all eligible children in a targeted assistance school. In making those determinations, a school might decide that homeless children and youth have greater needs because they face problems, for example, of attendance and homework completion due to recurrent moves and, therefore, may be at greater risk of failure than other children who are not faced with the disruption associated with homelessness.”**

**[USED Guidance, 3-21-14]**

**Q7. What if a district does not have homeless students? Does the LEA still have to reserve funds “in anticipation” of a future homeless concern?**

**A7.** An LEA is not required to reserve funds if no homeless students are identified in its non-Title I schools. If there is a documented history in the LEA of having provided adequate notice to schools, **parents/families,** public service locations, motels, etc., **which is compliant with the McKinney-Vento Act** and not having identified homeless students, then one could make the case to the State Education Agency (SEA) for no reservation.

[E-Mail response from USED]

**The district must complete and upload the updated Homeless Reservation Template to the 2014-15 Consolidated Application.**

An LEA may decide to reserve funds in anticipation of future homeless concerns; however, this must not be a disproportionate amount for this purpose to serve homeless students with Title I comparable services.

**Q8. Should the reservation for homeless students remain in the Title I budget for the entire school year?** **Could a district amend down its reservation at some point in time if the reservation is not needed? Could a district amend the homeless reservation down or up?**

**A8.** Yes. However, as homeless students can be identified throughout the year and not just at one point in time, an LEA would need to take that into consideration. Otherwise, using its own trend data it can amend the reservation, keeping in mind it is still required to provide the comparable services. **Yes, a district could also decide to amend the homeless reservation up or down to provide services aligned with the Consolidated Appropriations Act, effective in SY 2014-15.**

[USED e-mail communication]

**Q9.** **Who determines when and how the homeless reservation is expended?**

**A9.** District staff needs to be mindful that an approved Title I homeless reservation in the consolidated application is already detailed as to how the homeless reservation will be expended during the course of the year. However, it is recommended that the district administrator who is responsible for the oversight of the Title I and homeless reservation budget within the Consolidated Application periodically meet with the district homeless education liaison throughout the course of the school year to discuss the needs of the homeless as determined by the initial needs assessment and the LEA’s description of comparable services (see Q&A 3 Step 3 to review the process for defining comparable services). It is also recommended that the homeless education liaison initiate communication with the administrator responsible for Title I oversight regarding homeless students identified during the school year. The district administrator responsible for the Title I budget would amend the homeless reservation within the Title I budget, if necessary. Documentation should be maintained for all meeting regarding the coordination of services.

[MDE/OFS decision]

**“As part of this process, the LEA should involve the homeless liaison required under section 722(g)(1)(J)(ii) of McKinney-Vento, especially given the critical role the liaison plays in coordinating services to ensure that homeless children and youth have the opportunity to succeed academically.”**

**[USED Guidance, 3-21-14]**

**Q10. Who should district staff contact if they have questions regarding allowable costs for homeless students?**

**A10.** District staff with questions regarding allowable costs for homeless students should contact their Regional OFS Consultant for the questions that involve expenditures related to the Consolidated Application budgets: (Title I, Part A; Title I, Part C; Title I, Part D; Title II, Part A; Title III, and Title VI). If the question requires additional information before a response can be formulated, the OFS Consultant will refer the question to OFS management staff.

District staff should direct all other questions regarding their McKinney-Vento responsibilities and costs for homeless students to the McKinney-Vento Regional Grant Coordinator. In the event that the question requires additional information before a response can be formulated, the Regional Grant Coordinator will refer the questions to the MDE Homeless Education Consultant.

**Q11. Is the District required to have a Board Approved Homeless Policy?**

**A11.** MDE/OFS requires that a Board approved Homeless Policy be in place. USED has communicated that LEAs must demonstrate that they have developed, and have reviewed and revised policies to remove barriers to the enrollment and retention of homeless children and youth in schools in the State. It is recommended that districts review the McKinney-Vento homeless legislation [Section 722g(J)(i)] that describes the duties of the homeless education liaison and have this description in writing as part of its documentation. If the homeless education liaison is fully implementing the duties as described in the legislation, then the barriers to the enrollment and retention of homeless children are diminished. Documentation could include a Board approved homeless policy or administrative procedures, presented and approved by the board describing how the LEA has removed barriers to the enrollment and retention of homeless students.

**Q12. Can Title I fund the district homeless education liaison position?**

**A12.** **Yes. Beginning with the 2014-15 school year Title I, Part A funds may be used to support up to 100% of the salary for a LEA homeless education liaison, whether or not the staff performs other Title I duties. All homeless students are categorically eligible for Title I services, so serving those students is considered a Title I-A activity.**

**“Prior to the FY2014 appropriations language, ED indicated that, because the highlighted language specifically permits anther Federally funded coordinator to perform these duties, that an individual paid, in whole or in part, with Title I funds may serve as a homeless liaison in addition to his or her title I duties. Consistent with the appropriations language cited above, an LEA may use funds from its FY2014 Title I grant (and, consistent with GEPA section 425(b), Title I carryover funds) to fund all or part of the homeless liaison’s salary even if that person has no Title I duties.”**

**[USED Guidance, 3-21-14]**

**\*NOTE THAT FUNDING FOR THIS POSITION IS TO COME FROM THE REGULAR SALARIES TITLE I ALLOCATION, NOT FROM THE HOMELESS RESERVATION. Be aware that this administrative position (under function code 226) will count toward the LEA’s 10% administrative cap for Title I, Part A funds.**

If the homeless education liaison is also the superintendent, superintendent / principal or principal, then this would not be an allowable cost from Title I. [EDGAR]

If the district currently funds a homeless education liaison position with general (district) funds or if homeless education liaison responsibilities are part of an already existing general (district) funded position, then the district must comply with supplement and not supplant requirements.

If the district currently funds a Federal programs coordinator that includes Title I responsibilities or funds (in full or in part) an already existing Title I position such as a social worker / counselor, then those homeless education liaison activities could be part of the Title I-funded portion of the salary.

It is recommended that the district develop a coordinated description of critical services required for homeless students **and consult with the Regional McKinney-Vento Grant Coordinator** to determine if Title I or McKinney-Vento legislation best align for delivery of those services. Allowable uses of appropriate funds should guide the **determination of a staff to best** support those critical services.

Questions related to funding the specific homeless services by the Federal programs coordinator or a Title I funded position (social worker / counselor) in full or in part by Title I should be addressed to the OFS, Regional Services Unit. If necessary, OFS personnel will collaborate with the Homeless Education Consultant to determine an appropriate response.

[MDE/OFS decision based on [McKinney-Vento Sec. 722 (g)(1)(J)(ii); **USED Guidance, Title I ARRA, Sept. 2009, Item G-11; Consolidated Appropriations Act of 2014** ]

**Q13.** **How does a district establish communication and coordination to address the needs of the homeless students as required by Title I and McKinney-Vento?**

**A13.** MDE/OFS recommends that processes and procedures be put in place and documented similar to the processes and procedures required for Private School consultation.

1. The district homeless education liaison and the district administrator charged with oversight of Title I work together to analyze the homeless data from the CNA such as academic data, school and community demographic data. **(The Regional McKinney-Vento Grant Coordinator may also be consulted.)**
2. Identified needs of homeless students are discussed and agreed upon based upon the action steps listed in Q&A 3**, and included in the LEA’s Comprehensive Needs Assessment (CNA).**
3. Agreed upon district-wide homeless services are described and articulated as strategies in the District Improvement Plan (i.e., reference to policies and procedures on homeless, and the Dispute Resolution) and, if applicable, as instructional strategies in each Title I school’s school improvement plan. Coordination of Services is a requirement of the district, as well as a required component for both Title I Targeted and Schoolwide school improvement plans.

[Title I Sec. 1112(b)(1)(E)(ii); Title I Sec. 1114(b)(1)(J); Title I Sec. 1115(c)(1)(H)]

1. Periodic and documented meetings are held throughout the school year between the district homeless education liaison and the administrator charged with oversight of Title I\* to review and reevaluate the needs of the homeless as described in Q&A 10 and to ensure that compliance is met for homeless requirements in Title I and McKinney-Vento legislation. **Needs of homeless students should be represented in the LEA’s CNA and the District Improvement Plan.**

\***Note:** If the district administrator charged with oversight of Title I and the Homeless Education Liaison are one and the same person, it is recommended that the district include in its documentation the process and procedures of how it will determine other appropriate staff to be included in the coordination and implementation of McKinney Vento and Title I.

1. Contact MDE/OFS for clarification on homeless issues and direct questions to the appropriate staff as indicated in Q&A 10.