

Program Coordination for Children Receiving Services from Title I, Part A, and/or Services from Title X, Part C

September 1, 2006

Questions and Answers

Title I, Part A, Subpart 1 – Basic Program Requirements:

Eligible children include those who are economically disadvantaged, children with disabilities, migrant children, limited English proficient children, Head Start children, Even Start children, Early Reading First children, neglected or delinquent children, and homeless children.

They are identified by the school as failing or most at risk of failing, to meet the State's challenging student academic achievement standards on the basis of multiple, educationally related, objective criteria established by the school. Children from preschool through grade 2 shall be selected solely on the basis of such criteria as teacher judgment, interviews with parents, and developmentally appropriate measures.

However, funds received under this part may not be used to provide services that are otherwise required by law to be made available to children described above but may be used to coordinate or supplement such services.

Title X, Part C – Education for Homeless Children and Youth

Children eligible for these services are children who lack a fixed, regular, and adequate nighttime residence [within the meaning of Section 103(a)(1)]; and include

- (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 youth who have a primary night-time 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) indicated above.

A child who is homeless and attending **any** school (operating a Title I schoolwide delivery model, operating a Title I targeted assistance model, or not operating as a Title I school in the division) is eligible for Title I services. Homeless children attending either a school operating as

a schoolwide or as a targeted assistance Title I school may received Title I services from said program. However, the school division must reserve (set aside) a portion of Title I funds needed to provide services for homeless children attending a non-Title I school. Services for students experiencing homelessness in a non-Title I school must be comparable to the Title I services received by eligible children (homeless and non-homeless) in a Title I school.

In addition, a school division receiving Title I, Part A, funds must describe how the division will coordinate with the Title X, Part C, McKinney-Vento Homeless Assistance Act when filing its annual consolidated or Title I application with the SEA. [USED Guidance M-1; *No Child Left Behind Act of 2001*(NCLB), Title I, Part A, Section 1111(a)(1) and Section 1112(a)(1)]

Questions and Answers

1. Are homeless children and youth eligible to receive Title I, Part A, services?

Yes. Homeless children and youth are automatically eligible for services under Title I, Part A, of the *No Child Left Behind Act of 2001* (NCLB), whether or not they live in a Title I school attendance area or meet the academic standards required of other children for eligibility. [Section 1115(b)(2)(E)] Homeless children and youth may receive Title I educational or supportive services from schoolwide and targeted assistance school programs and through the reservation of funds for homeless children enrolled in non-Title I schools.

Although supportive services such as medical, dental, and clothing may be provided to children participating the Title I program and to children classified as homeless, the school division must first explore the availability of these services from other existing resources within the school division and community. If funds are not available from other public or private sources to provide such services, then Title I funds may be used as a last resort. [Title I, Part A, Section 1113(c)(3)(a); USED Guidance M-1]

2. Are homeless children and youth who attend non-Title I schools eligible to receive Title I, Part A, services?

Yes. School divisions must reserve Title I, Part A, funds in order to provide comparable services to homeless students who do not attend Title I schools. They may, for example, provide educationally related support services to children in shelters and other locations where homeless children live. These services should be provided to assist homeless students to take advantage of educational opportunities. [Section 1113(c)(3)(A)]

If appropriate, children in local institutions for delinquent children, and neglected or delinquent children in community day school programs may receive services. [Section 1113(c)(3)(C)]

The school division must coordinate its local annual consolidated application or local individual Title I, Part A, application with the plan developed by agencies under the Title X,

McKinney-Vento Act. A school division may develop a formula for reserving the appropriate amount of Title I funding for homeless students. [Section 1112(a)(1); Section 1113(c)(3); USED Guidance M-3]

3. Who decides how the Title I, Part A, reservation for homeless students in a non-Title I school will be calculated and how the funds will be used?

Determining the amount of the Title I, Part A, reservation and how the funds will be used should be a coordinated process involving the local homeless education liaison, the Title I coordinator, and other appropriate school division personnel. If all identified homeless children attend schools receiving Title I, Part A, funds, in a given year, an additional amount does not need to be reserved. However, if homeless children become enrolled in a non-Title I schools, later in the school year, an amount as necessary shall be reserved. The Title I coordinator and the local homeless education liaison should discuss the services provided.

When determining how funds will be used, the needs assessment found in Appendix F of the *Local Homeless Education Liaison Toolkit* may be used to promote a discussion of unmet needs and determining the most appropriate local use of Title I, Part A, funds to assist in meeting these needs.

4. What types of services may school divisions provide to homeless students with funds reserved under Section 1113(c)(3) of Title I, Part A?

School divisions may use funds reserved under this section to provide services to eligible homeless students in both Title I and non-Title I schools. Services provided to the homeless students must be comparable to services provided to other eligible students receiving Title I services. This includes providing educationally related support services to children in shelters and other locations where these children may live. Services provided should assist such children in meeting Virginia's challenging academic content and achievement standards.

Services do not need to be the same as those typically provided with Title I funds, but they must be comparable. School divisions have the discretion to use reserved funds to provide homeless students with services that are not ordinarily provided to other Title I students and *that are not available from other sources*. The following activities are examples of appropriate uses for Title I, Part A, funds that school divisions may consider when serving children and youth experiencing homelessness:

- a) Tutoring, extended day and summer activities, and other educational services that help homeless children and youth reach the same challenging content and student performance standards to which all children in Virginia are held. As clearly specified in NCLB, all academic enrichment programs for disadvantaged students, including programs for homeless students, must be aligned with State standards and curricula.

- b) Programs and other activities designed to raise awareness among educators and pupil services personnel of the rights of homeless children and youth under the McKinney-Vento Act, and the special needs such children and youth have as a result of their homelessness.
- c) School supplies or items of clothing needed to meet a school's dress or uniform requirement so that students may effectively take advantage of educational opportunities. [USED Guidance M-4, L-1]

5. Can Title I, Part A, funds be used to serve homeless students in middle or high school if the school division typically uses these funds for elementary schools?

Yes. The purpose of the homeless reservation of 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.

6. Can Title I, Part A, funds be used to provide transportation to the school of origin for students experiencing homelessness?

No. Transporting students to or from their school of origin while they are homeless is a requirement under the McKinney-Vento Act. Title I, Part A, funds cannot be used for this service because it would be considered supplanting one source of federal funds for another source of federal funds. USED guidance states that transportation becomes an option once the homeless student is permanently housed, making the use of Title I, Part A, funds allowable.

7. If a homeless child becomes permanently housed during a school year, is that child eligible to receive Title I, Part A, services for the remainder of that school year?

Yes. In general, a homeless child or youth who becomes permanently housed during a school year continues 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. For example, it may be appropriate in certain circumstances for a school division to use Title I, Part A, funds to transport *formerly* homeless students to or from their school of origin for the remainder of the school year in which they become permanently housed.

8. 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. Assessments of homeless students are to be included in the school division or in the state accountability system when students have been in a school for a full academic year. [Section 1111(b)(3)(C)(xi)]

States are not required to disaggregate, as a separate category, the assessment results of homeless students. However, the option of a flag can be used to identify the results of the homeless students and track their performance on the Standards of Learning (SOL) assessments. The McKinney-Vento subgrantee school divisions must report the SOL assessment performance of students experiencing homelessness as part of their annual report.

As homeless children and youth fall at the low end of the poverty continuum, school divisions and the states should include the assessments of homeless students in the economically disadvantaged category of disaggregation, in addition to other applicable categories (e.g., the “all student category”). [USED Guidance M-5]

9. Must Title I, Part A, funds be reserved if no homeless children have been identified by the school division?

If the school division has not identified homeless children and youth it is not required to reserve Title I, Part A, funds **provided** the following McKinney-Vento Homeless Education Assistance Improvement Act of 2001 requirement for outreach and identification have been met:

- The local school division has appointed a homeless liaison.
- Public notice of the educational rights of homeless children and youths is disseminated where such children and youths receive services under the McKinney-Vento Act, such as schools, family shelters, and soup kitchens.
- The liaison collaborates with local services providers such as social services, shelter staff, and other community support services to ensure identification of homeless children and youth.
- The school division has established a process to identify homeless students in its local student data record system.

10. What are some strategies that facilitate coordination and collaboration between Title I, Part A, and the Title X, Part C?

The following suggestions were generated during the 2001 Symposium on Homeless Education and Title I that was hosted by U.S. Department of Education and the National Center for Homeless Education:

- Include local homeless education liaisons at Title I conferences and in-services, and Title I coordinators at homeless education conferences and in-service professional development events.
- Ensure collaboration between local Title I coordinators and local homeless education liaisons to identify ways that Title I will serve children and youth experiencing homelessness as described in the local consolidated application or the local individual Title I application.

- Ensure collaboration between the state Title I director and the state McKinney-Vento coordinator on the state Title I plan or the state consolidated plan.
- Share Title I, Part A, and Title X, Part C, education handbooks, when available, and other resources with program staff serving Title I and homeless students.
- Collect and share within and across school divisions concrete data on the needs of children and youth in homeless situations.
- Initiate school division efforts to make organizational accommodations for eligible students, as necessary, in such areas as transportation, remaining in the school of origin, records transfer, class scheduling, and special services that will help them enroll, attend, and succeed in school.
- Ensure that the needs of highly mobile students are included in the school improvement plans and not addressed as a separate issue.
- Establish and widely disseminate information on division-wide policies, procedures, and guidelines to identify and serve eligible students.
- Consider local homeless education liaison representation on the State Committee of Practitioners.
- Include homeless parents in Title I parental involvement policies and create opportunities for homeless parents to be involved.

Adapted from:

United States Department of Education. (July 2004). 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*: Draft Non-regulatory Guidance. Washington, DC: Author.

The *No Child Left Behind Act of 2001*, Public Law 107-110-January 8, 2002