

Title I Set-Aside Funds for Students Experiencing Homelessness

Under the guidance of Title I, Part A funds may provide a wide variety of services to students experiencing homelessness. In addition to providing services to assist students experiencing homelessness in meeting the State's challenging academic achievement standards, Title I, Part A funds may be used to provide services that may not ordinarily be provided to other Title I students. For example, to help students experiencing homelessness effectively take advantage of educational opportunities, an LEA may use Title I, Part A funds to provide, where appropriate, items or services, including, but not limited to—

- Items of clothing, particularly if necessary 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, for example, necessary to enroll in school
- Immunizations
- Food
- Medical and dental services
- Eyeglasses and hearing aids
- Counseling services to address anxiety related to homelessness that is impeding learning
- Outreach services to students living in shelters, motels, and other 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
- Parental involvement specifically oriented to reaching out to parents of homeless students and engaging them in school
- Fees for AP and IB testing
- Fees for SAT/ACT testing
- GED testing for school-age students
- **Excess cost** of transporting students to and from school
- Salary of a homeless liaison in part or in full
- For educationally related support services, including Pre-K

Common Examples of Activities Allowed

- Cap & gowns for graduation
- Excess cost of transportation to and from the school of origin, i.e., cabs, parent reimbursement for driving, bus passes
- Transportation from a **school administrator program**, such as athletic practice or other before or after-school program
- Clothing or shoes needed for participation in gym class
- Tutoring expenses, including the transportation to obtain or provide tutoring, tutoring supplies, resources, and in places such as shelters, libraries, and other locations suitable for student learning

Common Examples of Activities NOT Allowed

- Rent/motel expenses
- Utilities
- Clothing for parents
- Class rings, yearbooks, or other school-year memorabilia
- Graduation announcements
- Prom attire
- Ongoing medication payments
- Soap, deodorant, toilet paper, cold medicine
- School meals
- Student snacks
- Groceries

Principles Governing Use of Title I Set-Aside Funds

Two principles govern the use of Title I, Part A funds to provide such services to students experiencing homelessness. First, the services **must be reasonable and necessary** to assist students experiencing homelessness to take advantage of educational opportunities (ESEA section 1113(c)(3)(A); 2 CFR § 200.403(a)). Second, Title I, Part 41 A 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 generally. (See ESEA section 1115(e)(2)).

Ways to Determine the Set-Aside Amounts

All LEAs that receive Title IA funds must reserve (set aside) the funds necessary to provide services to students experiencing homelessness comparable to services provided in Title IA schools. 20 USC 6313(c)(3). Additionally, the funds should be used for homeless children and youth attending any school in the LEA.

1. Base amounts on an annual homeless education program needs assessment that the district liaison has completed
2. Multiply the number of students experiencing homelessness by the Title IA per pupil allocation
3. For districts with subgrants, reserve an amount equal to or greater than the MV funding request
4. Reserve a percentage based on the district's poverty level or Title IA allocation

Questions to Consider on Allowable Expenses

- Does the expense meet the intent of the law?
- Can the expense be categorized as one of the authorized activities in the law?
- Does the expense cover services that apply only to the homeless education program and address the needs of students experiencing homelessness?
- Is the expense necessary for the efficient operation of the homeless education program?
- Is the expense reasonable in proportion to the rest of the program budget and the amount spent per student?
- Is the Cost reasonable?
- Is the expense for supplemental services?
- Is there evidence of coordination with Title I?
- Could this service be obtained from another source?

Prepared by:

Lisa Phillips, MALS, M.Ed.

State Coordinator for the Education of Homeless Children & Youth
Program Director for the Education of Foster Care Children & Youth
NC Department of Public Instruction

District and School Support Services | Office of Federal Programs
Phone: 336-543-4285 & Email: lisa.phillips@dpi.nc.gov