



Title I, Part A Homeless Reservation Frequently Asked Questions (FAQ)

1. Does the ESEA require an LEA to reserve Title I funds to support students experiencing homelessness?

Yes, each LEA is required to reserve Title I funds to provide comparable Title I services to students experiencing homelessness. LEAs are required to reserve a sufficient amount of their Title I funds to provide comparable supplementary academic and support services to students experiencing homelessness who may be enrolled at any time during the school year.

A child who is experiencing homelessness and attending any school in the district is eligible for Title I services. If an LEA has a mix of Title I and non-Title I schools, the LEA may use the homeless reservation to provide regular Title I services to students experiencing homelessness that attend non-Title I schools. The LEA can also use the reservation to provide students experiencing homelessness with services not ordinarily provided to Title I students, regardless of whether they attend Title I or non-Title I schools. Likewise, if an LEA has all Title I schools, it may use this reservation to provide its students experiencing homelessness with services not ordinarily provided to other Title I students.

ESSA sections 1113(c)(3)(A); 1113(c)(3)(C)(ii); and 2 CFR § 200.403(a)

2. How can the Title I, Part A Homeless Reservation be used for students experiencing homelessness?

The Title I, Part A Homeless Reservation may be used to provide a wide variety of services to students experiencing homelessness. In addition to providing academic services, such as reading interventions to assist students experiencing homelessness meet the state's challenging academic standards, the reservation may be used to provide support 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 the reservation to provide, where appropriate, items or services including, but not limited to—

- The homeless liaison's salary;
- The excess cost of transportation to and from the school of origin;



- 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 necessary to enroll in school;
- Immunizations;
- Food;
- Medical and dental services;
- Eyeglasses and hearing aids;
- Counseling services related to homelessness;
- 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;
- Tutoring services, especially in shelters or other locations where students experiencing homelessness live;
- Family engagement specifically oriented to reaching out to families experiencing homelessness;
- Fees for AP and IB testing;
- Fees for college entrance exams such as SAT or ACT; and
- GED testing for school-age students.

To use the Title I, Part A Homeless Reservation the services must be reasonable and necessary to assist students experiencing homelessness to take advantage of educational opportunities. Title I, Part A funds must be used only when funds or services are not available from other public or private sources that provide similar services for economically disadvantaged students in general.

*ESSA section 1113(c)(3)(A); 1113(c)(3)(C)(ii); 1115(e)(2); and 2 CFR § 200.403(a)
Non-Regulatory Guidance, M-4*



3. How should an LEA determine the amount of funds to reserve?

The ESEA does not prescribe a specific amount of Title I, Part A funds that LEAs must reserve. However, the ESEA requires that the amount be sufficient to provide services to students experiencing homelessness. LEAs have three options and must choose which works best for them.

- An LEA may use a districtwide, per pupil amount for students experiencing homelessness, if this approach yields a reservation amount that is sufficient for the LEA to meet these requirements. This may be a good option for LEAs with a small number of identified students experiencing homelessness.
- An LEA may reserve a percentage of their total Title I, Part A allocation. This may be a good option for LEAs with a large number of identified students experiencing homelessness.
- An LEA may determine its own amount that is reasonable and necessary to provide comparable Title I services to students experiencing homelessness. This option requires LEAs to explain how the amount was chosen in WISEgrants.

The Department of Public Instruction (DPI) recommends LEAs conduct a needs assessment of homeless children and youth, or include this population specifically in the LEA's overall needs assessment, when determining a sufficient amount to reserve to support students experiencing homelessness. As part of the needs assessment, LEAs should:

- Prioritize effective coordination between Title I and McKinney-Vento requirements;
- Encourage Title I coordinators and homeless liaisons to work together to develop and implement a plan that identifies ways that Title I funds and programs will serve children and youths experiencing homelessness;
- Collect and share concrete data on the needs of homeless children and youths; and
- Ensure that the needs of highly mobile students are included in school improvement plans and not addressed as a separate issue.



The National Center for Homeless Education has a resource to guide a needs assessment between the district homeless liaison and Title I coordinator.

[Determining the Title I, Part A Homeless Set Aside Amount](#)- This will download as a Word document.

ESSA section 1113(c)(3)(C)(i)
Non-Regulatory Guidance, M-6 and M-7

4. What if an LEA does not currently identify any students as experiencing homelessness?

If an LEA currently does not have students identified as experiencing homelessness, a Title I, Part A reservation is still required. A student may enroll at any time in the LEA, or a student currently enrolled in the district may have a change in housing status at any time.

The Title I, Part A Homeless Reservation may be used for the homeless liaison's salary. All LEAs must designate an appropriate staff person to carry out the duties of the homeless liaison required under McKinney-Vento. Duties include: assisting students/families with school placement, enrollment, and knowing their rights; disseminating public notice of educational rights; informing and assisting with accessing transportation; and mediating enrollment disputes.

The Title I, Part A Homeless Reservation may be used to cover the excess cost of transportation to and from the school of origin. There may be students experiencing homelessness attending their school of origin in another district, but reside in the LEA. In this situation, the LEA is responsible to share the cost of transportation with the district of origin.

ESSA section 1113(c)(3)(C)(ii)