

**TITLE I  
SET-ASIDES  
FOR  
HOMELESS  
CHILDREN  
AND  
YOUTH**

## **HOMELESS CHILDREN AND YOUTH IDENTIFICATION**

A homeless individual is one who:

- A. lacks a fixed, regular, and adequate nighttime residence; 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.

The first category may include some individuals who have moved in with others, and consideration of each individual case, along with the permanency of the situation, will probably be needed in order to identify those who are homeless.

In 1995, the U.S. Department of Education issued non-regulatory guidance, which included the following:

- Children in foster care should not be considered homeless unless they are temporarily placed in foster care because of lack of shelter space.
- Children who are runaways should be considered homeless even if their parents have provided or are willing to provide a home for them.
- Children who are “throwaway children” should be considered homeless until a fixed, regular, and adequate residence is established for them.
- All abandoned children are homeless until a fixed, regular, and adequate residence is established.
- Children who live with friends or relatives because of loss of housing or other similar situation should be considered homeless.
- Children living in “doubled up” families may be considered homeless if the family is doubled up or tripled up because of loss of housing or a similar situation.
- School aged, unwed mothers or mother-to-be who reside in a home for unwed mothers should be considered homeless if they have no other available living accommodations.
- Migrant children should not be considered homeless unless they meet the definition in the McKinney Act.

If you have further questions regarding homeless qualifications, please contact the State Homeless Coordinator at 573-522-8763.

## **Mandatory Reservations of Funds**

Section 1113(c) (3) (A) states, “A local educational agency shall reserve such funds as necessary under this part to provide services comparable to those provided to children in schools funded under this part to serve homeless children who do not attend participating schools, including providing educationally related support services to children in shelters and other locations where children may live.”

The LEA must set aside funds for services to homeless children. School districts must establish their own methods for allocating Title I, Part A, set asides for homeless children and youth who are not attending Title I schools. Generally, these methods involve conducting a needs assessment for homeless students in the school district or basing the set-aside amount on a formula, such as a per pupil expenditure. Determining an appropriate amount requires coordination between the Title I Coordinator and Homeless Coordinator.

Below are some methods that may be used to calculate your Title I, Part A, set aside:

**Method #1 Reserve the set aside amount on what you would be eligible for if you were applying for a McKinney-Vento subgrant.** In Missouri, the competitive McKinney-Vento homeless application allows school districts to apply for funding based on the number of homeless children and youth being educated in the district up to a maximum level of \$400 per homeless child. **If your district does not identify any homeless children and youth, a minimum of \$400 should be set aside in case a homeless student should arrive in your district.**

**Method #2 Reserve the set aside amount based on a percentage.** A specific percentage of funds for homeless children and youth can be reserved based on your Title I, Part A allocation, or on your district’s poverty data. Generally, if you have a higher poverty percentage, you will have a higher number of homeless children and youth.

**Method #3 Reserve the set aside amount based on your homeless student count and Title I, Part A per-pupil allocation.** To reserve funds by using this method, you will need to take your homeless children and youth count multiplied by your Title I, Part A per-pupil allocation.

**Method #4 Reserve the set aside amount based on homeless student’s needs.** Based on your district’s prior years’ expenses related to fulfilling the requirements set out in Section 722(g)(6) of McKinney-Vento, set aside an amount that will allow you to provide appropriate services.

Homeless children and youth often face unique barriers when accessing educational programs and striving for academic success, ensuring that these students receive “comparable” services may require additional programming that is not provided to other Title I students. For instance, Title I, Part A, states that it is appropriate to provide educationally-related support services, such as tutoring, to children at shelters or other places where homeless children may live, such as motels. [20 USC 6313(c)(3)(A)] In addition, guidance from the U.S. Department of Education states that LEAs may 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 guidance offers an example of using reserved funds to provide clothing to meet a school’s dress or uniform requirements. Hence, in determining appropriate expenditures for the funds set aside for homeless students, it is important to note that *comparable* services do not mean services that are necessarily *identical* to other Title I, Part A, services.

In addition to serving homeless students not enrolled in Title I schools, U.S. Department of Education guidance states that set asides also can be used to provide services to homeless students who *are* attending Title I schools. In determining the set-aside amount, LEAs should allow for the provision of services to homeless students who attend Title I schools that will meet the unique needs of these children above and beyond the regular Title I programs at those schools, as well as for the provision of services to homeless students who do not attend Title I schools.

### **Suggestions for Services**

After assessing the needs of homeless students, the homeless coordinator and Title I coordinator, along with other district-level administrators, may consider funding the following:

- Before-school, after-school, and/or summer programs
- 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
- Basic needs, such as clothing, uniforms, school supplies, and health-related needs
- Counseling services
- The hiring of teachers, aides, and tutors to provide supplemental instruction to students whose achievement is below grade level
- The work of the local liaison
- Parental involvement programs that make a special effort to reach out to parents in homeless situations
- Research-based programs that benefit highly mobile students
- Data collection to assess the needs and progress of homeless and other highly mobile students