

Title I-A Set-Aside Guidance for Arizona

Revised November 8, 2019

Subtitle VII-B of the McKinney-Vento Homeless Assistance Act (42 U.S.C. § 11431 et seq.; hereafter the McKinney-Vento Act) "ensures that children experiencing homelessness have access..."

There are two types of Title I services: **schoolwide programs** and **targeted assistance programs**.

Schoolwide programs: These programs serve all students within the school and seek to upgrade the school's entire educational program to ensure that all students, particularly those who are low achieving, attain elevated levels of academic proficiency.

Targeted assistance programs: These programs target assistance to students identified as most at-risk of not meeting state academic standards.

Homeless students within Title I local educational agencies attend schools within one of the following categories:

- Title I schools with **schoolwide programs**,
- Title I schools with **targeted assistance programs**, or
- Non-Title I schools

Homeless students in all 3 categories are eligible for Title I **schoolwide programs** and should receive such services based on their individual needs. Title I funds that are "set aside" should be used to assist Homeless students in accessing an education equitable to that of their permanently-housed peers so that they are able to meet the challenging content of the Arizona Academic Standards.

Homeless students in School wide programs must receive Title I **targeted assistance programs** comparable to those of their peers. In a school wide program, all students benefit from Title I **targeted assistance programs**. Students who need extra learning time to meet the Arizona State Standards must be provided with timely additional assistance that is tailored to their needs.

Homeless students in Targeted Assistance programs must be included in the rank order process upon enrollment. The targeted assistance process involves integrating multiple educational measures, rank ordering eligible students by academic need, and serving those most at-risk of failing to meet the Arizona State Standards. Homeless students have a federal right to be included in the rank order process, but they may or may not ultimately receive **targeted assistance programs**, depending on where they fall in the rank order.

Homeless students in Non-Title I schools must be individually assessed for academic need upon enrollment. If, based on this needs assessment, the school determines a



Homeless student is at risk of failing to meet the Arizona State Standards, the student shall be provided **targeted assistance programs** comparable to those offered in the local educational agency's Title I schools. Educational services should be offered on a case-by-case basis.

M-5. Are homeless children and youths who attend non-Title I schools eligible to receive Title I, Part A services?

Yes. Under section 1113(c)(3)(A) of the ESEA, an LEA must reserve sufficient Title I funds to provide services to homeless students who attend non-Title I schools that are comparable to those provided to students in Title I schools. These services may include providing educationally related support services to children in shelters and other locations where homeless children live. Services should be provided to assist homeless students to effectively take advantage of educational opportunities. In addition to serving homeless children and youths who attend non-Title I schools, as described in question M-4, the homeless set-aside may be used to provide services to homeless students in Title I schools that are not ordinarily provided to other Title I students.

M-6. How should an LEA determine the amount of funds to reserve for comparable services under Title I, Part A?

Funds reserved for comparable services under section 1113(c)(3)(A)(i) of the ESEA may be determined based on a needs assessment of homeless children and youths in the LEA, taking into consideration the number of homeless children and youths identified by the LEA and their unique needs. This needs assessment may be the same as the needs assessment conducted by the LEA in applying for local McKinney-Vento subgrant funds (ESEA section 1113(c)(3)(C)(i)).

M-7. What kind of needs assessment should LEAs conduct related to homeless children and youths to determine a suitable set-aside for comparable services and additional educational support services?

One method for the LEA needs assessment is to look at homeless student enrollment averages or trends in the district over a two- or three-year period and the average per-pupil cost of providing Title I-funded services in the current fiscal year and multiplying those two numbers. However, the needs of homeless children and youths that affect their enrollment, attendance, and success in school 42 can be unique and distinct from housed students and should be reviewed periodically and regularly, at least more than once per school year. Other factors to consider are the presence of other State and Federal education grants that can provide the same or similar services as well as other community resources; these also change annually or regularly. Finally, the LEA should consider what is necessary and reasonable for each student to fulfill the purposes of the Title I and McKinney-Vento programs in their district, as well as the effectiveness of past activities in accomplishing the goals of those programs for individual students as well as the overall programs.



M-8. What is an LEA required to include in its Title I, Part A plan regarding services for homeless students? Under section 1112(b)(6) of the ESEA, an LEA must describe in its Title I, Part A plan the services it will provide homeless children and youths, including services provided with funds reserved under section 1113(c)(3)(A) of the ESEA, to support the

enrollment, attendance, and success of these children and youths. An LEA's Title I, Part A application also should include a description of the method used for determining the amount reserved, whether by a needs assessment or some other method (e.g., past homeless student enrollment and support service cost data), and how the liaison was consulted or involved in determining the set-aside.

Tips for Facilitating Collaboration Between Title I and McKinney-Vento Act Programs

The Title I, Part A program is a significant Federal education resource for the education of homeless children and youths. While McKinney-Vento Act subgrants are received by or cover approximately 20 percent of all LEAs, Title I, Part A homeless education requirements impact homeless children and youths in significantly more LEAs. Therefore, effective coordination between these two programs (given the requirements in both programs to serve homeless children and youths) can have substantive impacts on many homeless students. Consider the following recommendations for facilitating stronger collaboration:

- Ensuring that LEA local liaisons attend Title I conferences and in-service days and that Title I coordinators attend homeless education conferences and in-service professional development days;
- Encouraging local Title I Coordinators and LEA Local 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;
- Encouraging collaboration between the State Title I Coordinator and the State McKinney- Vento Coordinator on the State Title I Plan or the State Consolidated Plan;
- Sharing Title I and Homeless Education handbooks with other program staff;
- Collecting and sharing within and across districts concrete data on the needs of homeless children and youths;
- Leading district-wide efforts to make organizational accommodations for eligible students, as necessary, in such as 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; and
- Ensuring that the needs of highly mobile students are included in the school improvement.



Suggested Uses for Title I-A Homeless Set-Aside

Key Questions to Consider:

- *What can be done to supplement existing efforts to close the achievement gap?*
- *What educational support will increase their opportunity for success?*

- 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;
- Birth certificates 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;
- 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 Advanced Placement (AP) and International Baccalaureate (IB) testing;
- Fees for college entrance exams such as the SAT or ACT; and
- GED testing for school-age students (ED, 2017, pp. 40-41)

If you have any further questions, please do not hesitate to contact the Homeless Education Program Team

Homeless@azed.gov



1535 West Jefferson Street, Bin #31, Phoenix, Arizona 85007 • (602) 542-54963 •