



**THE STATE EDUCATION DEPARTMENT** / THE UNIVERSITY OF THE STATE OF NEW YORK / ALBANY, NY 12234  
Office of P-12 Education

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**NYS FIELD MEMO**  
**NCLB McKinney-Vento**  
**# 03 – 2011**

August 1, 2011

To: District Superintendents  
Superintendents of LEAs and Charter Schools  
Title I Coordinators  
McKinney-Vento Liaisons

From: Roberto Reyes   
Director Title I School and Community Services

Subject: Title I, Part A Set-aside Funds for Students in Temporary Housing (Homeless)

It's time to once again remind McKinney-Vento Liaisons to work with your Title I Coordinators/Directors to ensure that Title I, Part A funds are set-aside in the Consolidated Application Update for the 2011-12 school year. As you may know, the Consolidated Application Update is designed for LEAs and Charter School LEAs to demonstrate how they plan to meet the requirements of NCLB and the programs they plan to implement in order to meet the instructional needs of all students. As such, all LEAs/Charter School LEAs are required to submit a 2011-12 Consolidated Application Update along with a budget (FS-10) and budget narrative for each program for which funds are requested. Along with this, all Local Educational Agencies (LEAs) are required to submit the Title I Application Supplement online. This required online form provides general instructions that include information in Section 6 regarding the required Reserves.

The purpose of this memorandum is to inform you about the required Reserve (set-aside) for McKinney-Vento eligible students in homeless situations. The high mobility, trauma and poverty associated with homelessness create unique educational barriers and challenges that permanently housed Title I students may not face. Thus, homeless students often require additional support. In most instances, these LEA reserves should be identified in the Title I, FS-10 budget. Even if no homeless children or unaccompanied youth are currently identified within your school district, a reserve must be included for homeless children who may enroll in the LEA later during the school year. For more information regarding this requirement:

<http://www.p12.nysed.gov/nclb/cladcep/1112/suppinstruct.html>

Title I, Part A targets students who are most at risk for failing in school, specifically including children and youth experiencing homelessness. The Elementary and Secondary Education Act

(ESEA) requires coordination between Title I and the McKinney-Vento Act. All children and youth experiencing homelessness are automatically eligible for Title I, Part A services whether or not they live in a Title I school attendance area or meet the academic standards required of other children for eligibility. (M-V Section 722(g)(4)(B)).

Every school district that receives Title I, Part A funds is required to set-aside a portion of its allocation to provide comparable services to homeless students attending schools that do not receive Title I, Part A services (Title I of ESEA Section 1113(c)(3)(A)). For example, Title I, Part A funds frequently serve elementary school students. The mandatory set-aside ensures that middle and high school students experiencing homelessness in those districts receive Title I, Part A services.

School districts in which all of the schools in the district receive Title I funding, and Charter Schools that receive Title I funding, are not mandated to set-aside a portion of such funding for students who are homeless. However, they are encouraged to do so. Every single schoolwide plan should address how the educational needs of students who are homeless will be met, and how the district will coordinate with housing programs in planning the programs and services to meet the educational needs of such students. If there are shelters in the district and they have, or the district itself has, identified needs for educationally-related support services that are distinct from those of regularly housed students, the district could reserve funds to meet those needs. Homeless children and youth often face unique barriers to accessing educational programs and achieving 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 313(c)(3)(A)].

There is no mandated formula for calculating the Title I set-aside funding. However, the set-aside must be sufficient to provide "comparable services" to students attending non-participating schools. In order to determine the Title I set-aside amount, you may:

- Review needs and costs involved in serving homeless students in the current year and use those figures to project for the following year.
- Multiply the number of homeless students by the Title I, Part A per pupil allocation.
- For districts with sub-grants, reserve an amount greater than or equal to the McKinney-Vento sub-grant funding request.
- Reserve a percentage based on the district’s poverty level or total Title I, Part A allocation.

For more information please access the following resource guide: Four Methods for Determining New Mandatory Title I, Part A Set-Aside for Homeless Children, NCLB Compliance Insider: [http://www.nysteachs.org/media/INF\\_Fed\\_TitleI\\_SetAside\\_QA.pdf](http://www.nysteachs.org/media/INF_Fed_TitleI_SetAside_QA.pdf)

Services provided should assist children in meeting New York State academic content and achievement standards. Title I funding cannot be used to supplant services required under the McKinney-Vento Act, e.g. transportation to the school of origin during compulsory school hours.

See Field Memo dated September 27, 2010 for more information:

[http://www.nysteachs.org/media/INF\\_SED\\_Transportation\\_and\\_Title\\_I.pdf](http://www.nysteachs.org/media/INF_SED_Transportation_and_Title_I.pdf)

Examples of services that can be provided with Title I Set-aside funds include, but are not limited to:

- Before-school, after-school, and/or summer programs;
- Counseling services;
- Outreach efforts to identify children and youth living in homeless situations and help them access school programs;
- Basic needs such as clothing, uniforms, school supplies, and health-related needs;
- Transportation once the student is permanently housed;
- The work of the liaison;
- Tutoring services;
- 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;
- Fees for AP, SAT/ACT testing; and,
- Other services that are not ordinarily provided to permanently housed Title I students and are not available from other sources.

For more information see:

*Title I and Homelessness*, a guide with information about how Title I funds can be used to support students who are homeless: [www.serve.org/nche/downloads/briefs/titlei.pdf](http://www.serve.org/nche/downloads/briefs/titlei.pdf)

Please contact Melanie Faby, Homeless Program Associate, or myself at (518) 473-0295 or NYS-TEACHS at (800) 388-2014 for assistance with any questions. Thank you.

Cc Ira Schwartz  
Melanie Faby