

# Title I Set-Asides and Homeless Students

## QUESTIONS AND ANSWERS

*(All answers to the questions below were provided by the U.S. Department of Education.)*

**1. Are districts that are 100% Title I still required to do Title I set-asides?**

No, it's only required to provide comparable services, so if all campuses receive Title I funds, a set-aside for homeless students is not mandatory. However, such districts may **choose** to set aside additional funds to serve homeless children and youth.

**2. What types of services may an LEA provide to homeless students with funds reserved under Section 1113(c)(3) of Title I? (Taken from the July 2004 USDE Guidance, section M-4.)**

*An LEA may use funds reserved under this section to provide services to eligible homeless students in both Title I and non-Title I schools that are comparable to services provided to non-homeless students in Title I schools. Services provided should assist such children in meeting the State's challenging academic content and academic achievement standards.*

*An LEA has the discretion to use reserved funds to provide a homeless student with services that are not ordinarily provided to other Title I students and that are not available from other sources. For example, where appropriate, an LEA at its discretion may provide a student with an item of clothing to meet a school's dress or uniform requirement so that student may effectively take advantage of educational opportunities.*

Based on this answer, the USDE states that there is a difference between what Title I funds can support for homeless children compared with other Title I children. Use of Title I funds for clothing, for example, would not be allowable for Title I participants in general.

Following this guidance, here are questions related to expenditures for specific items:

**2a. Can Title I, Part A, funds pay for emergency food for homeless children?**

Yes, **provided funds are not reasonably available from other public or private sources to provide nutrition services** (see section 1115(e)(2)(A)). The obvious question would be, therefore, whether the district participates in USDA's free-reduced price lunch program or whether there are local resources to help the child receive appropriate nutrition to help him/her through the school day.

**2b. Can Title I, Part A, funds pay for rental assistance to prevent a child from losing housing?**

No.

**2c. Can Title I, Part A, funds pay for clothing for young children of homeless teen parents?**

No.

- 2c. Can Title I, Part A, funds pay for clothing for young children of homeless teen parents?**  
No.
- 2d. Can Title I, Part A, funds pay for medical/dental services for homeless students?**  
Yes, **as a last resort**, provided funds are not reasonably available from other public or private sources to provide such services (see section 1115(e)(2)(B)).
- 2e. Can Title I, Part A, funds pay for eyeglasses for homeless students?**  
Yes, **as a last resort**, provided funds are not reasonably available from other public or private sources to provide such services (see section 1115(e)(2)(B)).
- 2f. Can Title I, Part A, funds pay for birth certificates for homeless students?**  
Yes, **if there is no other way** to obtain the required record and not having one would prevent the child from having access to school.
- 2g. Can Title I, Part A, funds pay for anything for the parents of homeless students, such as clothing or GED testing fees?**  
Not for clothing.  
Yes, for GED testing fees that are part of literacy training for parents of children participating in Title I programs and the school district **has exhausted all other reasonably available sources** of funding for such training (see section 1118(e)(7)).
- 2h. Can Title I, Part A, funds pay for GED testing for homeless school-age students?**  
Yes.
- 2i. Can Title I, Part A, set-aside funds be used to pay for immunizations for homeless students?**  
Yes, **as a last resort**, provided funds are not reasonably available from other public or private sources to provide such services (see section 1115(e)(2)(B)).

The following expenses may not be paid using McKinney-Vento or Title I funds:

Utilities

Rent/Motel/hotel rooms (any type of housing in general)

Medical expenses for parents

Physical exams for participation in sports or sports uniforms

Gas cards or gift cards from stores such as HEB, Target, Wal-Mart, etc., may be used **ONLY IF** the grantee (or district) can establish a clear audit trail.

Homeless students attending private schools are eligible to receive "comparable services" in terms of Title I support from the school districts in which the student resides.