Guidelines for the Use of Title I / Title I, Part A, Set-Aside Funds

USDE Title I Allocation To Texas (TEA)

TEA Title I Allocation to District/LEA

District/LEA Allocation of Title I Funds

"Regular" Title I Funds

LEA MAY allocate funds to cover the cost of the homeless liaison's salary (separate from campus allocations)

LEA MAY allocate funds to cover the "excess costs" of transportation for students in homeless situations to and from their school of origin and/or to cover costs of "supplemental" transportation

LEA allocates funds to campuses for "targeted assistance" programs (as applicable)

LEA allocates funds to campuses for "school-wide" programs (as applicable)

Title I, Part A, Set-Aside Funds

Required funds are allocated ("set-aside") by ALL districts receiving Title I funds sufficient to provide comparable services to students in homeless situations NOT served on a Title I campus

Homeless students receive services

Verification process in place shows that all homeless students have received services comparable to other homeless students on Title I campuses

Additional funds MAY be allocated, or, if applicable, surplus funds MAY be used to:

Provide additional support services to students on BOTH Title I and non-Title I campuses that go beyond the services provided through the "regular" campus Title I programs. These services may be different from those received by other Title I-eligible students.

Provide salary for the LEA homeless liaison

Provide funds to cover "excess costs" of transporting students in homeless situations to and from their school of origin.

[See notes on the back of this diagram.]
Guidelines for the Use of Title I / Title I, Part A, Set-Aside Funds

1. Title I, Part A requires ALL school districts to reserve sufficient Title I funds to provide services to students experiencing homelessness 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 children experiencing homelessness may live [20 U.S.C. 6313(c)(3)(A)].

2. Homeless set-aside funds may be used to provide comparable services to students experiencing homelessness who do not attend a Title I school, but also may be used to provide services to students experiencing homelessness, including those attending Title I schools, that are not ordinarily provided to other Title I students, including funding the homeless liaison position, and funding transportation to and from the school of origin [20 U.S.C. § 6313(c)(3)(C)(ii)].

3. LEAs should develop, implement, and amend campus and district improvement plans and Title I programs for homeless interventions with the use of comprehensive needs assessments that include students in homeless situations.

4. Title I services and programs should be designed to help students experiencing homelessness take advantage of ALL the educational opportunities offered by the LEA. The U.S. Department of Education (USDE) has extensive guidance on the allowable and flexible uses of Title I funds for this purpose. For a summary of the Title I, Part A, provisions for serving students in homeless situations, visit: http://www.theotx.org/resource_type/title1-title1-parta-set-asides/

5. An LEA should include the designated homeless liaison in all decisions regarding the Title I program and use of funds in order to most effectively impact the lives of children.

6. Determining an appropriate homeless set-aside amount requires coordination between the school district’s Title I, Part A and McKinney-Vento programs. The set-aside amount may be determined based on an assessment of the needs of students experiencing homelessness within the district, considering both the number and needs of these students [20 U.S.C. § 6313(c)(3)(C)(i)]. Methods for calculating set-aside amount may be found at http://www.theotx.org/wp-content/uploads/2014/08/Title-I-homelessness-ESSA.pdf

Two principles govern the usage of homeless set-aside funds:
1. The services must be reasonable and necessary to assist students experiencing homelessness to take advantage of educational opportunities.
2. The funds must be used only as a last resort when funds or services are not available from other public or private sources.

Use of Title I and Title I, Part A, Set-Aside Funds to Pay for Transportation
According to guidance released with the Consolidated Appropriation Bills of 2014 and 2015, which was incorporated into the reauthorization of Title I with the passage of the Every Student Succeeds Act (ESSA), Title I funds may be used to pay for the incremental costs of transporting homeless students to and from their schools of origin. Incremental costs are the excess costs of transportation incurred to provide school of origin transportation.

Use of Title I funds for this purpose may come from the district Title I allocation or from the Title I, Part A, Set-Aside. However, Title I, Part A, Set-Aside funds MAY NOT BE used to pay for the excess costs of school of origin transportation UNLESS the district can demonstrate that the requirement to provide comparable services to homeless services on all non-Title I campuses has been met. The use of funds for transportation services cannot supersede the provision of all Title I services to eligible students on non-Title I campuses.

A district may also allocate Title I funds to cover the costs of supplemental transportation for students, such as transportation home after after-school tutoring. Title I, Part A, Set-Aside funds may be used to cover the costs of supplemental transportation for homeless students, such as routes to homeless shelters for homeless students staying for tutoring or athletic practice after school, or for Saturday off-site tutorial programs. Services created under the Title I, Part A, Set-Aside designed to impact only on homeless students do not create a comparable services threshold that must be applied to other non-homeless Title I-eligible students in the district.

Questions?
Contact the Texas Homeless Education Office (THEO) at 800-446-3142 or theo@austin.utexas.edu.