



## MCKINNEY-VENTO LAW INTO PRACTICE BRIEF SERIES

### Serving Children and Youth Experiencing Homelessness under Title I, Part A

#### This NCHE brief:

- examines how Title I, Part A intersects with the McKinney-Vento Homeless Assistance Act regarding serving children and youth experiencing homelessness (CYEH); and
- offers strategies for collaboration between the Title I, Part A and the Education for Homeless Children and Youths (EHCY) program for serving CYEH.

#### INTRODUCTION

The purpose of Title I, Part A of the Elementary and Secondary Education Act (ESEA) (ESEA section 1111 *et seq.*) is to provide all children with a fair, equitable, and high-quality education and to close educational achievement gaps. Title I, Part A is designed to meet the educational needs of low-achieving students in school districts with the highest levels of poverty by aligning high-quality assessments, systems of accountability, teacher preparation, curriculum, and instructional materials with challenging state academic standards. To support school districts in implementing program goals, the Title I, Part A program provides financial assistance to local educational agencies (LEAs, hereafter *school districts*) and schools with high numbers or percentages of children from low-income families.

Subtitle VII-B of the McKinney-Vento Homeless Assistance Act (McKinney-Vento Act) ensures that CYEH have access to the same free, appropriate public education, including a public preschool education, and related services as their permanently housed peers. This access ensures that CYEH have an equal opportunity to meet the same challenging state academic standards to which all students

#### THE MCKINNEY-VENTO HOMELESS ASSISTANCE ACT DEFINITION OF HOMELESS

McKinney-Vento Act section 725(2)

The term "homeless children and youth"—

A. means individuals who lack 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; or are abandoned in hospitals;

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 [...];

iii. children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and

iv. migratory children [...] who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (i) through (iii).



are held (McKinney-Vento Act section 721(4)). The McKinney-Vento Act requires state educational agencies (SEAs) and school districts to remove barriers to the identification, enrollment, attendance, and success in school of CYEH (McKinney-Vento Act section 722(g)(1)). The McKinney-Vento Act also emphasizes collaboration and parent participation as critical to the educational success of CYEH.

While the McKinney-Vento Act addresses many of the challenges faced by CYEH through the EHCY program, Title I, Part A also plays a significant role in supporting their academic achievement. Both statutes include requirements for coordination between the two programs. Additionally, both Title I, Part A, and the McKinney-Vento Act include provisions for grant funds to be distributed by SEAs to school districts for activities aligned with the goals of each program as established in federal legislation. This includes supporting the educational success of CYEH. This brief explains how Title I, Part A of the ESEA and the McKinney-Vento Act intersect, offering strategies for effective cross-program collaboration. Briefs on additional homeless education topics are available on the [NCHE resources webpage](#).

### **STATUTORY REQUIREMENTS FOR CROSS-PROGRAM COLLABORATION**

To identify and address the needs of CYEH more effectively, both the McKinney-Vento Act and Title I, Part A require cross-program coordination. The McKinney-Vento Act requires every school district to appoint a local homeless education liaison (hereafter local liaison<sup>1</sup>) to serve as the school district's key homeless education contact and oversee the implementation of the McKinney-Vento Act in schools throughout the school district (McKinney-Vento Act section 722(g)(1)(J)(ii)). As part of their responsibilities, local liaisons (LLs) must coordinate and collaborate with other school personnel responsible for providing services to CYEH (McKinney-Vento Act section 722(g)(6)(C)).

Title I, Part A requires that programs operated under its authority coordinate at the state and local levels. Therefore, all school districts receiving Title I, Part A funds must include a description in their local plans of how the school district's Title I, Part A program is coordinated with its EHCY program (ESEA section 1112(a)(1)(B)). The development of the local plan should include timely and meaningful consultation with the LL (ESEA section 1112(a)(1)(A)), and must describe the Title I, Part A services that will be provided to CYEH, including through homeless set-aside funds (ESEA section 1112(b)(6); see *Serving Students Experiencing Homelessness with Set-Aside Funds* below for more information).

In addition to meeting each program's statutory requirements, cross-program coordination provides an opportunity to optimize resource allocation. While 63% of traditional U.S. public schools were eligible for Title I funding in the 2021-22 school year (SY), only 21% of U.S. school districts received McKinney-Vento subgrant funding for that SY (National Center for Education Statistics, 2024; Congressional Research Services, 2023). In order to meet the needs of all CYEH, both programs must work together to leverage resources to the greatest extent possible.

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<sup>1</sup>Every local educational agency (LEA) has a local homeless education liaison who oversees the implementation of the McKinney-Vento Act in schools throughout the LEA (McKinney-Vento Act section 722(g)(1)(J)(ii)).

## AUTOMATIC ELIGIBILITY FOR TITLE I, PART A SERVICES

CYEH are part of Title I, Part A's target population of disadvantaged students; however, the high mobility, trauma, and poverty associated with homelessness create unique educational barriers and challenges that Title I, Part A students with fixed, regular, and adequate housing may not face. Experiencing homelessness has been associated with lower standardized test scores in reading and math (Cowen, 2017; Cutuli et al., 2013; Obradović et al., 2009; Pavlakis et al., 2017; Rafferty et al., 2004). CYEH also transfer schools more often, which requires them to adapt to new curricula, teachers, and peers while increasing the risk of "broken bonds." These factors can negatively impact learning (Cunningham et al., Obradović et al., 2009). Additionally, this increased school mobility negatively impacts school attendance, with CYEH missing more instructional days than their permanently housed peers (Dhaliwal et al., 2021; Richards & Pavlakis, 2022). Thus, CYEH often require support beyond what typically may be offered to other students to support their academic success.

For these reasons, CYEH are automatically eligible for Title I, Part A services, whether or not they attend a Title I, Part A school or meet the academic standards required of other students for eligibility (ESEA section 1115(c)(2)(E); ED, 2018, p. 39). This automatic eligibility acknowledges that the experience of homelessness puts children and youth at significant risk of academic failure, regardless of their previous academic standing. Additionally, automatic Title I, Part A eligibility allows CYEH who are doing well academically to receive additional non-instructional education-related support services needed to succeed in school.

## SERVING CHILDREN AND YOUTH EXPERIENCING HOMELESSNESS UNDER SCHOOLWIDE AND TARGETED ASSISTANCE PROGRAMS

Title I, Part A funds two types of school 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 high levels of academic proficiency.
- **Targeted assistance programs:** These programs target assistance to students identified as most at-risk of not meeting state academic standards.

CYEH who attend a school with a schoolwide or targeted assistance program may have unique challenges that are not addressed by the school's regular Title I, Part A programming, such as issues related to residential and school mobility, family disruption, and extreme poverty. These challenges may create barriers to full participation in Title I, Part A programming and undermine the overarching program goal of helping all students meet challenging state academic standards. For instance, students residing in shelters, motels, or other overcrowded conditions may not have a quiet place to study and may need extended after-school library time; or, a student who is dealing with the stress and anxiety

## IDENTIFYING STUDENT NEEDS



The educational barriers experienced by CYEH often are more complex and challenging than those experienced by other students. To ensure that resources are used effectively and have the greatest impact, when designing Title I, Part A schoolwide or targeted assistance programs, the Title I director and LL should work together to review data on the number of CYEH and their academic performance.

They also should explore any continued barriers to the educational success of these students and ensure that these barriers are addressed through regular Title I, Part A and EHCY programming, the Title I, Part A set-aside, and/or McKinney-Vento subgrant funds.

associated with homelessness may not be able to focus on his or her studies, and may benefit from counseling services. Consider the ways that your school district's and school's Title I, Part A program can help meet the unique needs of these children and youth.

## SERVING CHILDREN AND YOUTH EXPERIENCING HOMELESSNESS WITH SET-ASIDE FUNDS

Title I, Part A requires school districts to reserve sufficient Title I funds to provide services to CYEH 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 CYEH may live (ESEA section 1113(c)(3)(A)(i)). Homeless set-aside funds may be used to provide comparable services to CYEH who do not attend a Title I school, but also may be used to provide services to CYEH, including those attending Title I schools, that are not ordinarily provided to other Title I students, including funding the LL position and funding transportation to and from the school of origin (ED, 2018, p. 42, ESEA section 1113(c)(3)(C)(ii)).

## ALLOWABLE USAGES OF SET-ASIDE FUNDS

Two principles govern the usage of homeless set-aside funds:

1. The services must be reasonable and necessary to assist CYEH to take advantage of educational opportunities (ED, 2018, p. 41).
2. The funds must be used only as a last resort when funds or services are not available from other public or private sources (p. 41).

With these principles in mind, allowable usages of Title I, Part A set-aside funds may include, but are not limited to

- items of clothing, particularly if necessary to meet a school's dress or uniform requirement;
- 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;

## SCOPE, INTENSITY, AND TYPE OF SERVICES



Due to the many and varied needs of CYEH, the Title I, Part A services provided to these children and youth may need to be greater in scope and intensity, and/or different in nature than those normally provided to non-homeless students. For example, a child or youth experiencing homelessness who is participating in tutoring as part of a targeted assistance program also may need counseling services due to exposure to domestic violence or other trauma that may be affecting learning.

Alternatively, a school district may provide an article of clothing to a child or youth experiencing homelessness to allow the student to meet the school dress code. These additional services that may go beyond what is provided to all Title I, Part A students are allowable, given that they are supplemental to the regular school program but also ensure that the student can effectively take advantage of educational opportunities.

- 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, 2018, p. 40).

### **DETERMINING TITLE I, PART A SET-ASIDE AMOUNTS**

Determining an appropriate homeless set-aside amount requires coordination between the school district's Title I, Part A, and EHCY programs. The set-aside may be determined based on an assessment of the needs of CYEH within the district, considering both the number and needs of these children and youth (ESEA section 1113(c)(3)(C)(i)); this assessment may be the same as the needs assessment conducted as part of the district's McKinney-Vento subgrant application process (McKinney-Vento Act section 723(b)(1)). Furthermore, the set-aside must be determined based on the total Title I, Part A allocation received by the district, and reserved prior to any allowable expenditures or transfers by the district (ESEA section 1113(c)(3)(B)).

School districts should establish their own methods for determining their homeless set-aside while working with the state program offices for Title I and EHCY, as appropriate. When determining the set-aside amount, the Title I director and LL should partner to gather and review relevant data, ensuring that sufficient Title I, Part A funds are reserved to meet the needs of CYEH. Such strategies may include leveraging relevant ED Facts data points to determine that the Title I, Part A homeless set-aside amount is sufficient to meet the needs of CYEH. As a reminder, in determining the set-aside amount, school districts should allow for the provision of services to meet the unique needs of CYEH who attend Title I, Part A schools that are above and beyond services provided through the regular Title I, Part A programs at those schools, in addition to the provision of services to CYEH who do not attend Title I, Part A schools.

Once a school district has identified the needs of CYEH to be addressed, the amount of funds necessary to provide services should be determined. In addition to planning interventions based on student needs, planned services should be of sufficient time and intensity to impact students' academic outcomes. Possible methods for calculating the set-aside amount include

- determining a percentage of the school district's Title I, Part A funds to reserve for the homeless set-aside;
- multiplying the number of CYEH identified by the district by the Title I, Part A per-pupil allocation;
- matching the amount of McKinney-Vento subgrant dollars received by the school district, if applicable; or
- adjusting previous set-aside amounts based on past set-aside expenditures and trend data, such as the number of CYEH identified, these students' academic outcomes and educational needs, and changes to community poverty levels and/or the local economy.

### **STRATEGIES FOR COLLABORATION TO IMPROVE STUDENT OUTCOMES**

Personnel who oversee EHCY and Title I, Part A programming should communicate and collaborate on an ongoing basis to identify the needs of CYEH, review available resources, and plan ways to address student needs. Continual cross-program interaction enables school districts to respond to the emerging needs of CYEH and implement interventions expediently to ensure these students' academic success. Strategies to facilitate cross-program collaboration are provided below.



## STRATEGIES FOR TITLE I, PART A STATE AND LOCAL DIRECTORS

- Include state coordinators and LLs in coordinated systems for support, such as school support teams or a Committee of Practitioners for Title I.
- Involve homeless education personnel in the creation of schoolwide, targeted assistance, and school improvement plans to ensure that the educational needs of CYEH are addressed within these plans.
- Use data from a variety of sources, including the EHCY program, Title I, Part A, and other education interventions to determine appropriate homeless set-aside funding levels and activities.
- Include a requirement for a Title I, Part A set-aside in the Title I, Part A basic grants application issued by the state. Applications that either fail to provide a set-aside or fail to meet the minimum threshold set in the application should be required to provide a justification for omitting or limiting the set-aside.
- Include parents experiencing homelessness in Title I, Part A parent involvement activities and create opportunities for these parents to engage in their children's education.

## STRATEGIES FOR STATE COORDINATORS AND LOCAL LIAISONS

State coordinators should provide comprehensive guidance and support to all school districts, emphasizing the critical role of LLs in assessing and addressing the needs of CYEH. LL engagement is essential for determining the appropriate Title I, Part A homeless set-aside amount and ensuring that these set-aside funds are directed toward the needs of CYEH. Specific examples of guidance to offer include:

- Provide input regarding plans to serve CYEH that may be included in Title I, Part A applications.
- Provide Title I directors with data regarding the needs of CYEH to determine appropriate homeless set-aside funding levels and activities.
- Work with Title I directors and LLs to establish a process for providing LLs with ready access to homeless set-aside funds and addressing the emerging needs of CYEH. This process should clearly articulate the school district's homeless set-aside amount and the steps an LL can take to access set-aside funds expediently.
- Require a description of coordination activities with Title I, Part A in McKinney-Vento subgrant applications issued by the state.
- Provide information about Title I, Part A services offered by the school district in homeless education materials provided to parents, guardians, and youth.

## NCHE INFORMAL NEEDS ASSESSMENT TOOL



*NCHE's Local Educational Agency Informal Needs Assessment* resource provides school districts with a series of questions organized by topic that may be used to determine the status of their district's services for CYEH.

The assessment also helps school districts identify where to focus efforts to meet the most critical needs of these children and youth. This resource may help determine the amount of a school district's Title I, Part A homeless set-aside funds and how these funds will be used.

<sup>2</sup>Every state has a state coordinator for homeless education who oversees the implementation of the McKinney-Vento Act in LEAs throughout the state (McKinney-Vento Act section 722(d)(3)).

## JOINT STRATEGIES FOR TITLE I, PART A AND EHCY PROGRAMS

- Locate Title I and EHCY program offices to facilitate cross-program communication.
- Partner to provide joint Title I, Part A and EHCY program training and materials.
- Share handbooks for Title I, Part A and EHCY programs, along with other resources related to serving students experiencing high poverty and mobility, with program staff.

## CONCLUSION

While CYEH often have substantial needs and face unique educational barriers, Title I, Part A and EHCY programs complement each other by sharing the common goal of identifying and meeting the educational needs of these students. Cross-program partnerships not only meet each program's statutory requirements for collaboration but have the potential to significantly improve the academic outcomes of CYEH.

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Every state is required to have a state coordinator for homeless education and every school district is required to have a local homeless education liaison. These individuals oversee the implementation of the McKinney-Vento Act. To find out who your state coordinator is, visit the [NCHE data webpage](#).

For more information on issues related to the education of children and youth experiencing homelessness, contact the NCHE helpline at **305-306-8495** or [NCHE.helpline@safalpartners.com](mailto:NCHE.helpline@safalpartners.com).

