

A Closer Look at File Specifications: FS 193

The National Center for Homeless Education (NCHE) developed a series of briefs focused on ensuring data submitted to the U.S. Department of Education (ED) meet quality standards and conform to program requirements. The series supplements information provided in ED's [file specifications](#), which are the primary guidance documents on ED Facts data collections. This brief provides information about the data collection and submission process for adjusted cohort graduation rate data submitted under File Specification (FS) 193: LEA Subgrant Status.

Data Collected by FS 193

FS 193 includes Data Groups (DGs) 788, 797, and 886. Since its inception as an ED Facts data collection for School Year (SY) 2004–05, this file specification has provided information on the amount of Title I, Part A funds that each local educational agency (LEA) reserved for parental involvement activities and the total Title I, Part A allocation that each LEA received. Starting with SY 2022–23, this file specification also collects information on the amount of Title I, Part A funds that each LEA reserved to serve students who experience homelessness.

- DG 788 collects information on the Title I, Part A amount that each LEA reserved to support parental involvement activities.
- DG 797 collects information on the total Title I, Part A allocation that the state educational agency (SEA) made to each local educational agency (LEA).
- DG 886 collects information on the Title I, Part A amount that each LEA reserved to serve homeless children and youth.

This brief takes a closer look at DG 886.

Important Dates

FS 118 is usually due by January 2027 for School Year (SY) 2025-26. The file is usually enabled in EDPass in November 2026 and may be submitted at any time between then and January 2027. These data will be submitted via ED's new data submission system, [EDPass](#).

Data Quality Checks

As data are submitted to EDPass, the system automatically completes checks to ensure the data are accurate and complete. The system's data checks are based on the [Business Rules Single Inventory \(BRSI\)](#) published by ED. Data that violate the rules included in the BRSI will be immediately flagged. To complete the data submission, state coordinators for homeless education must work with their ED Facts coordinator to either draft and submit a note explaining the error or revise and resubmit the data. Data cannot be submitted in EDPass until all flags are addressed. Rule failures can be resolved by either uploading corrected data or by submitting a note that explains why the business rule failed. However, data errors can *only* be resolved by uploading a corrected data file.

The questions below are based on rules pertaining to FS 193 contained in the BRSI. To ensure that data are ready to be loaded into EDPass, state coordinators, ED Facts coordinators, and others reviewing data included in FS 193 can use the questions to validate their data. If any question results in a response of "no," state coordinators should investigate the reason and work with liaisons or the data staff submitting information to make corrections prior to submitting data in EDPass. If, upon further investigation, the data are determined to be correct even though they do not align with the BRSI, state coordinators should work with ED Facts coordinators to submit explanatory comments with the data.

To ensure that data are accurate and complete, some of the questions below expand on the rules included in the BRSI. Questions that align with the BRSI are indicated by listing the BRSI rule after the question.

Completeness

- Does each LEA reported in FS 193 have a whole dollar amount included for the Title I, Part A reservation to serve children and youth who experienced homelessness reported for DG 886? (BRSI Rules ALL-0001, ALL-0002, ALL-0008, TIPA-0037, TIPA-0038, TIPA-0041)
- Is there a data note included to explain why data are missing for every LEA assigned a 0 or -1 for the Title I, Part A reservation to serve children and youth who experienced homelessness in DG 886? (BRSI Rules ALL-0001, ALL-0002, ALL-0008, TIPA-0037, TIPA-0038, TIPA-0041)

Current Year Accuracy

- Are the Title I, Part A reservations to serve children and youth who experienced homelessness included for each LEA in DG 886 less than the total Title I, Part A allocation for each LEA reported in DG 797? It is important to remember that SEA ED Facts coordinators and/or EHCY state coordinators can obtain initial LEA homeless reservation amounts from their SEA Title 1 director or federal programs director.
- Is the reservation to serve children and youth who experienced homelessness included for each LEA in DG 886 greater than zero if the LEA reported students enrolled in the LEA during the previous school year in FS 118: Homeless Students Enrolled? (BRSI Rule TIPA-0042)

Accuracy Across Years

- For LEAs that enrolled the same or more students who experienced homelessness in the current year compared to the previous school year and have the same or greater total Title I, Part A allocation, is the reservation to serve children and youth who experienced homelessness reported for DG 886 equal to or greater than the amount that the LEA reserved in the previous school year?

General Data Quality Notes

The Elementary and Secondary Education Act (ESEA) requires each LEA that receives Title I, Part A funds to reserve an amount from those funds to provide services to students who experience homelessness enrolled in Title I and non-Title I schools (Section 1113(c)(3)(A) of the ESEA (2015) and 34 C.F.R. § 200.77(a)(1)). Such reservations must be reasonable and necessary to meet the academic and related needs of students who experience homelessness. The process for determining such reservations must also be based on collaboration between the LEA homeless liaison and the Title I, Part A coordinator.

- LEAs that did not receive Title I, Part A funds should not be included in the file.
- An LEA may adjust the amount reserved during the grant year as the number and needs of students who experience homelessness change. LEAs may also carry over funds that are unobligated at the end of the grant year. DG 886 only collects information on the original reservation amount that each LEA set aside.
- An allocation must be set aside regardless of the number of Title I, Part A and non-Title I, Part A schools within the LEA. The set-aside must be made before other transfers or expenditures and based on the total allocation that the LEA received.

The reporting period for DG 886 is any 12-month period for the primary use of the Title I, Part A allocation that the SEA provided to the LEAs. Allocations designated to support supplemental activities during the summer months should be included based on the SEA's defined reporting year. Based on the SEA definition of a school year, the reporting period may include the summer months before the regular school year or after the regular school year.

Providing Notes About Quality

SEAs are expected to submit data comments for each issue flagged by business rules in the EDPass system. Notes that SEAs submit will be included with data when they are published by ED or NCHE. The comments should be concise, explain a problem or major change within the data, explain why data have not been submitted, or explain steps the SEA is taking to correct the data. The three most common mistakes SEAs make when including comments with their data are

1. using the same comment that was used for the previous collection window, even though it is out of date and no longer relevant;
2. including comments for a data point that do not apply to that data; and
3. including comments that are unclear or confusing.

The following are examples of comments that help clarify data included under FS 193 and will likely reduce the number of corrections the SEA will be asked to make:

- State training efforts resulted in # of LEAs adjusting their Title I homeless set-asides. This created a larger-than-expected year-to-year change that has been verified as accurate.
- Our state experienced a wildfire before the start of the school year that caused several communities to evacuate and endure significant losses. Our number of students who were homeless increased as a result. The set-asides for several districts increased significantly in relation to these events.
- Our state has undertaken a new outreach initiative, working with higher education and youth health centers. As a result, our number of identified unaccompanied homeless youth increased significantly. This, in turn, has affected the amount of Title I, Part A funds that our LEAs have set aside.
- A large district in our state lost funding that provided social workers in each building within the LEA. To prevent a loss of staff that would negatively impact services provided to homeless students, the LEA significantly increased the Title I, Part A set-aside for homeless students.
- Two communities in our state lost a significant number of jobs when two large manufacturers were forced to lay off employees. This impacted our student counts; the LEAs adjusted their set-asides accordingly.

The following are examples of comments that are vague, do not indicate what steps were taken to address the concern identified during EDPass data submission, or indicate that the SEA violated a rule included in the file specifications. These comments are therefore likely to result in the application of a data quality note before ED releases data:

- All schools within the LEA are Title I buildings.
- Data are correct (in response to an error message).
- This is the same methodology we used last year (in response to an error message).

The following page provides a table of all applicable business rules for FS 193, including the rule ID, the rule objective, and the rule definition. This table is intended to illustrate the extent of FS 193 and to help state coordinators, EDFacts coordinators, and others review the data included in FS 193.

EDPass Rule ID	Rule Objective	Definition
All-0001	Completeness	The file must contain meaningful data.
All-0002 (A-LEA, B-SCH)	Completeness	All operational LEAs or schools, as applicable, are expected to be included in the file.
All-0008	Completeness	All permitted value combinations where zero reporting is required are expected to be included in the file.
TIPA-0037	Completeness	The LEA Reservation to serve homeless children and youth data group in the Title I Allocations file must contain meaningful data and is expected to include counts greater than zero.
TIPA-0038	Completeness	The LEA Reservation to serve homeless children and youth data group in the Title I Allocations file must contain meaningful data and is expected to include values other than Missing (-1).
TIPA-0041	Completeness	A reservation amount to serve homeless children and youth is expected to be reported for each LEA included in the Title I Allocations file.

***Note:** More details about each rule may be found by accessing [EDFacts Business Rules | U.S. Department of Education](#).

Public Availability of Data

While data are aggregated and do not include personally identifiable information, they are made available to the public to increase transparency, identify technical assistance and programmatic needs, and provide information to policymakers. The following list is not all-inclusive, as LEAs, SEAs, and other non-governmental organizations may also release information on the education of children and youth experiencing homelessness. However, the list provides several examples of how data submitted to ED are released to the public.

- **ED Data Express** is a website hosted by ED to improve public access to data at the district and state levels. Data for students who experienced homelessness and related notes on data quality can be accessed by visiting <https://eddataexpress.ed.gov/> and selecting the green *Data Download* button. After clicking the green *Reset Filters* button, data may be filtered by choosing options for the state, level (LEA or SEA), school year, file specification, and homeless subgroup to create a downloadable file.



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The National Center for Homeless Education operates the U.S. Department of Education's National Technical Assistance Center for Homeless Education (NTACHE). The contents of this brief were developed under a contract with ED; however, these contents do not necessarily reflect ED's views or policies.