

Q& A Document: Using Title 1 Part A Set-Aside Funds

Q: Can the Title 1 funds be used for the broader population when it comes to pantry and clothing?

A: The purpose of Title I, Part A of the Elementary and Secondary Education Act (ESEA; 20 U.S.C. § 6301 et seq.) is to provide all children with a fair, equitable, and high-quality education, and to close educational achievement gaps. There are 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.

Q: Can Title 1 Part A Set-Aside be used to pay for a driver's license fees?

A: No, the costs associated with obtaining a driver's license is not an allowable use of Title I Part Set-Aside funds. Please refer the [NYS Allowable and Unallowable Uses of Title I Funds](#).

Q: How do we know how much funding to put aside? Is it based on the number of participants?

A: It is dependent upon what your numbers of MV eligible students have been and if your LEA has any outside resources available. The U.S. Department of Education has some good guidance on calculating the amount of the Title I, Part A set-aside. Specifically, the Department states that LEA set-aside amounts may be determined based on a needs assessment that reviews homeless student enrollment averages and trends over 2-3 years and multiplies by the average per-pupil cost of providing Title I services. SED recommends that formula as a floor, not a ceiling – basically, a rough starting point that could be fleshed out depending on other local factors, such as the need to increase staff time to better identify students and to meet the ESSA requirement that the liaison is “able to carry out” his or her McKinney-Vento duties. In addition to the PPA as described above, typically, the amounts given are a range but \$100 per MV eligible student seems to be the average.

Q: Can Title I funds be used for college deposit fees?

A: [The U.S. Department of Education's guidance](#) states that the two general principles for using Title IA funds for homeless students are:

1. Services must be reasonable and necessary to enable homeless students to take advantage of educational opportunities.
2. Funds must be used as a last resort when services are not reasonably available from another public or private source.

Unfortunately, it seems this would not be allowable, since college would not be necessary to take advantage of an educational opportunity offered by the local educational agency. Title I, Part A set-aside funds are focused on PreK-12.

Q: If the Title I funds are used for the Liaison salary, then does each MV student need to have the code 0892?

A: If the McKinney-Vento Liaison's salary is funded using Title I set-aside funding, LEAs may apply this program service code if the student (or their family) has had at least one conversation with the liaison and the liaison facilitated receipt of services or resources. This includes the completion of the Housing Questionnaire during registration.

Q: Who do I speak to in regard to my district's Title 1 funding?

A: Under the Every Student Succeeds Act, all local educational agencies (LEAs) that receive Title I, Part A funds are required to reserve funds for students experiencing homelessness. 20 U.S.C. § 6313(c)(3)(A). The liaison should be involved in determining the amount and uses of the set-aside as part of the LEA's Title I, Part A plan. Regardless, the District Finance/Budget Director or Grant Manager should be able to help.

Q: Can you clarify the purchase of gift cards using Title I funds?

A: LEAs need to follow their LEAs' Procurement/Inventory Policies. Use of store cards includes directions to the recipients of what the authorized items that can be purchased are /intent of the store card (food, clothing) and a reminder that store cards are intended for the students specifically, not the whole family. Family /student must submit the receipts back to the program. The LEA keeps track of the date of issuance, name of person issued card to, card value, merchant/card type, serial number of cards. Many LEAs have "accounts" with local stores like Target and Kohls for students' needs that may expedite this process.

Q: How can we fund some sort of graduation dues?

A: Graduation dues are dependent on what is included. For Title I funds, the question is whether this is an "educational opportunity." Arguably, if it is a school activity, it is an educational opportunity. The Guidance from USED on this is: "Two principles govern the use of Title I, Part A funds to provide such services to homeless students. First, the services must be reasonable and necessary to assist homeless students to take advantage of educational opportunities. (ESEA section 1113(c)(3)(A); 2 CFR § 200.403(a)). Second, Title I, Part A funds must be used only as a last resort when funds or services are not available from other public or private sources...

Q: What is a "certain situation" where a family's utility bill could be paid by Title I funds?

A: Unfortunately, utility bills are not covered- but you may look at the ARP HCY Funds to cover the cost on a one-time basis. [Here](#) is a link to the part of the U.S. Department of Education's guidance, which specifically mentions allowable expenditures. <https://schoolhouseconnection.org/wp-content/uploads/2017/05/TitleIuseoffunds.pdf>

Q: Does Counseling services mean outside counseling or in school counseling?

A: The counseling could be both. It depends on the level of student needs. It could be scheduled meetings with the school social worker or guidance counselors or "outside" counseling services to address anxiety related to homelessness that is impeding learning Title I set-aside funds may be used to pay for this.

Q: What happens when a student becomes homeless over the summer and moves to a different district. Is the previous district still the district of origin? Would they be billed for educating the student?

A: If a student moves/loss of housing to another district; the student/family have a choice between the school last attended (origin) or the place currently housed (current residence). MV focuses on school stability and school of origin as it may be in the best interest of the child. If the family chooses to attend the current school of residence, then that school would ask the school of origin for school records and STAC the former school of origin. For more information on the STAC 202/Designation Process please see: <https://www.nysteachs.org/stac-202>