



# UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

SEP 21 2006

Shelley Reed, President  
National Association for the Education  
of Homeless Children and Youth  
C/O Truancy and Dropout Prevention  
Maine Department of Education  
23 State House Station  
Augusta, Maine 4333-0023

Dear Ms. Reed:

This is in response to your request for clarification as to whether Title I, Part A funds may be used to pay the salary of a homeless education liaison. I share your concern over the important role of the local educational agency (LEA) homeless liaison for ensuring that homeless children and youths participate fully in schooling, and appreciate your bringing this issue to my attention.

Section 722(g)(1)(J)(ii) of Subtitle B of Title VI of the McKinney-Vento Homeless Assistance Act (Education for Homeless Children and Youths) requires each State that receives funds under that Act to submit a plan to the Secretary which, among other things, includes an assurance that "local educational agencies will designate an appropriate staff person, who also may be a coordinator for other Federal programs, as a local educational agency liaison for homeless children and youths . . ." Therefore, a person paid with Title I, Part A funds may also serve as the homeless liaison and, accordingly, Title I, Part A funds may pay, in whole or in part, the salary of the homeless liaison. Title I, Part A funds may not be used to pay any portion of the salary of an individual who serves solely as the homeless liaison with no responsibility for any part of the Title I, Part A program.

Please be aware that the Michigan Department of Education also asked for clarification on this and several other matters related to the use of Title I, Part A funds for children and youths experiencing homelessness. I am enclosing a copy of my response to that inquiry for your information.

Thank you again for bringing this question to my attention.

Sincerely,

Jacquelyn C. Jackson, Ed.D.  
Director  
Student Achievement and  
School Accountability Programs

Enclosure

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Response to questions raised by the Michigan Department of Education  
9/19/2006

This is in response to your request for additional guidance about the use of Title I, Part A funds for certain activities and related services for children who are experiencing homelessness.

The general rule is that a local educational agency (LEA) may use funds reserved under section 1113(c)(3) of Title I 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. These services 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 the student may effectively take advantage of educational opportunities.

1. May Title I, Part A funds be used to pay for all or part of the salary for a homeless liaison?

**Response:** Section 722(g)(1)(J)(ii) of Subtitle B of Title VI of the McKinney-Vento Homeless Assistance Act (Education for Homeless Children and Youths) requires each State that receives funds under that Act to submit a plan to the Secretary which, among other things, includes an assurance that "local educational agencies will designate an appropriate staff person, who also may be a coordinator for other Federal programs, as a local educational agency liaison for homeless children and youths . . ." Therefore, a person paid with Title I, Part A funds may also serve as the homeless liaison and, accordingly, Title I, Part A funds may pay, in whole or in part, the salary of the homeless liaison. Title I, Part A funds may not be used to pay any portion of the salary of an individual who serves solely as the homeless liaison with no responsibility for any part of the Title I, Part A program.

2. May Title I, Part A funds reserved under section 1113(c)(3) be used for rent for temporary lodgings until a homeless family or youth finds housing?

**Response:** No.

3. May Title I, Part A funds be used for graduation robes or class rings?

**Response:** A class ring is not necessary to take advantage of educational opportunities nor does it assist a child in meeting a State's academic achievement standards. Therefore, it would not be an allowable use of the Title I, Part A funds.

With regard to graduation robes, the answer is more nuanced. If a district requires students to wear a graduation robe to participate in graduation activities, or if graduation robes are not required, but virtually all students wear them, generally Title I funds may be used. However, if the district has a policy for any student who cannot afford to rent or buy the graduation robe, this policy should also apply to a student experiencing homelessness who cannot afford a robe. For example, if the district has a fund to provide graduation robes for low-income students, this fund should be used to provide a graduation robe for a student experiencing homelessness.

4. May Title I, Part A funds be used to pay the cost of drivers' licensing test fees? This would pertain to a homeless youth that would need to drive to a job after school in order to secure rent for his lodgings.

**Response:** No.

5. May Title I, Part A funds pay for fees to enable students experiencing homelessness to participate in extracurricular activities after school such as band, sports/football, dance, and cheer-leading?

**Response:** No.