

Alaska Department of Education & Early Development

McKinney-Vento Program

Education for Homeless Children and Youth

Spending Handbook



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Introduction

This document provides general guidance on how districts may spend funds under the Title VII-B of the McKinney-Vento Homeless Assistance Act, as amended by Every Student Succeeds Act (ESSA). ESSA is the most recent version of the Elementary and Secondary Education Act (ESEA) which was signed into law on December 10, 2015.

It is important to note that this handbook only provides an overview of the Title VII-B rules and options and Title I-A homeless set-aside; it does not discuss the many other compliance requirements that apply to the program. Agencies receiving federal funds must adhere to the regulations under the federal Uniform Grant Guidance (UGG) (2 CFR, Part 200), the Federal agency's regulations (such as the Education Department's General Administrative Regulations), and applicable Federal and State statutes and regulations. To learn more, visit the Alaska Department of Education and Early Development's (DEED) [Federal Grants Management](http://education.alaska.gov/grants/fed-grants) (education.alaska.gov/grants/fed-grants) webpage.

General Spending Considerations

There are three general considerations that affect district spending under all the programs discussed in this handbook:

First, all costs charged to U.S. Department of Education (ED) grants must be **necessary and reasonable** when considering the amount of money being spent and the needs of the program.¹ This requirement comes from a set of Federal regulations known as the Uniform Grant Guidance (UGG), which applies to all Federal grants including ED grants.²

UGG affects ED grant spending in several ways. It:

- **Lists costs that may never be paid for with Federal funds.**³ For example, Federal funds can never pay for alcohol⁴ and typically cannot pay for lobbying.⁵
- **Lists general criteria all costs supported with Federal funds must satisfy.**⁶ For example, Federal funds can only pay for costs that are allocable to the relevant grant.⁷
- **Sets additional requirements for certain costs supported with Federal funds.**⁸ For example, districts that use Federal funds for employee salaries and benefits must keep records documenting how much time the employees spent on grant activities.⁹
- **Sets rules for how districts procure goods and services with Federal funds,**¹⁰ how they **track items** paid for with Federal funds,¹¹ and the **kinds of records** they must keep about their grant spending.¹²

Second, activities supported by ED funds must be **consistent with the district's application** for funds approved by DEED.¹³

Third, as discussed throughout this document, some ESSA programs require districts to spend on activities that are supported by evidence, are demonstrated to be effective, or that are consistent with a formal needs assessment. Even where this is not required, ED grant spending has the most impact when districts spend Federal funds on effective activities designed to meet program goals. To do this, districts are encouraged to:

- Carefully consider the needs of students, educators, and other relevant stakeholders,
- Determine which activities are most likely to effectively address those needs, and
- Prioritize those activities when deciding what costs to support with ESSA funds (unless those activities are being paid for by other funding sources).

¹ 2 CFR 200.403(a).

² The Uniform Grant Guidance (UGG) is contained in Part 200 of Title 2 of the [Code of Federal Regulations](#) U.S. Department of Education's [Technical Assistance for ED Grantees](#) contains more Federal guidance and other resources about the UGG.

³ See 2 CFR Part 200, Subpart E.

⁴ 2 CFR § 200.423.

⁵ 2 CFR § 200.450.

⁶ See 2 CFR § 200.403.

⁷ 2 CFR § 200.403(a).

⁸ See 2 CFR §§ 200.420-200.475.

⁹ 2 CFR § 200.430.

¹⁰ 2 CFR §§ 200.317-200.326.

¹¹ 2 CFR §§ 200.313-200.314.

¹² See, for example, 2 CFR § 200.318(h)(i) for procurement records or 2 CFR § 200.302(b)(3) for financial records.

¹³ 34 CFR § 76.700.

Overview of Title VII, Part B

Purpose

The McKinney-Vento Act was first enacted in 1987 as a subsection of the Stewart B. McKinney Homeless Assistance Act. It was most recently reauthorized in 2015 as Title IX, Part A of The Every Student Succeeds Act (ESSA).

The McKinney-Vento Act ensures that children and youth experiencing homelessness can enroll in and attend school without barriers. Specifically, the statement of policy provides an overview of the purpose of the McKinney-Vento Act:¹⁴

1. Each State educational agency (SEA) ensure that each child of a homeless individual and each homeless youth has equal access to the same free, appropriate public education, including public preschool education, as provided to other children and youths.
2. In any State where compulsory residency requirements or other requirements in laws, regulations, practices, or policies, may act as a barrier to the identification of, or the enrollment, attendance, or success in school of, homeless children and youths, the State educational agency and local educational agencies in the State will review and undertake steps to revise such laws, regulations, practices, or policies to ensure that homeless children and youths are afforded the same free, appropriate public education as provided to other children and youths.
3. Homelessness is not sufficient reason to separate students from the mainstream school environment.
4. Homeless children and youths should have access to education and other services that such children and youths need to ensure that such children and youths have an opportunity to meet the same challenging State academic standards to which all students are held.

Homeless Children and Youths Defined

Subtitle VII-B of the McKinney-Vento Homeless Assistance Act (per Title IX, Part A of the Elementary and Secondary Education Act, as amended by the Every Student Succeeds Act) defines *homeless* as follows:

(A) means individuals who lack a fixed, regular, and adequate nighttime residence (within the meaning of section 103(a)(1)); 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 (within the meaning of section 103(a)(2)(C));
- (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 (as such term is defined in section 1309 of the Elementary and Secondary Education Act of 1965) who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (i) through (iii).

¹⁴ 42 U.S.C. § 11431.

General Requirements of the McKinney-Vento Program

All districts, regardless of whether they receive a McKinney-Vento subgrant and/or Title I-A funds, must comply with required identification, reporting, and service responsibilities to homeless children and youth (e.g., enrollment, transportation, free meal benefits, equal access to education and extracurricular activities, services).

Districts engage in coordination and collaboration with other departments, local organizations, and agencies to provide comprehensive services to homeless children and youth and their families. Districts also offer expedited evaluations of the needs of homeless children to help them enroll in school, attend regularly, and achieve success.

Districts that receive the Title I, Part A homeless set-aside and/or the Title VII, Part B funds must carry out a variety of activities as a condition of participating in the program including, but not limited to:

- Identification and immediate enrollment of homeless children and youth.¹⁵
- Maintaining school of origin, to the extent feasible, except when doing so is contrary to the wishes of the parent or guardian (or in the case of an unaccompanied homeless youth, against the youth's wishes).¹⁶
- Providing or arranging transportation to and from the school of origin.¹⁷
- Providing "comparable services" to other students in the LEA, including educational services provided under Title I, Part A, Individuals with Disabilities Education Act (IDEA), English language learner supports, Career and Technical Education (CTE) programs, gifted and talented programs, and other supports.¹⁸
- Ensuring enrollment disputes are mediated in accordance with paragraph (3)(E)¹⁹
- Dissemination of public notice of the educational rights of homeless children and youths where such children and youths receive services under this chapter, such as schools, family shelters, and soup kitchens.²⁰

The McKinney-Vento Act provides LEA requirements for serving homeless children and youth. Under section 42 U.S.C. §11432(g)(3) LEAs must:

- Immediately enroll the child or youth, even without records that are normally required for enrollment, or if the child or youth has missed application or enrollment deadlines during any period of homelessness;
- Assist with obtaining immunizations or other required health records;
- Continue a homeless child's or youth's education in the school of origin for the duration of homelessness and for the remainder of the academic year, even if the child or youth becomes permanently housed during an academic year;
- Enroll the homeless child or youth in any public school that non-homeless students who live in the attendance area in which the child or youth is living are eligible to attend;
- Presume that keeping the child or youth in the school of origin is in the child's or youth's best interest, except when doing so is contrary to the request of the parent, guardian, or unaccompanied youth;
- Consider student-centered factors related to the child's or youth's best interest, including factors related to the impact of mobility on achievement, education, health, and safety of homeless children and youth, giving priority to the request of the parent, guardian or unaccompanied youth;
- Provide a written explanation of the reasons for the LEA's decision, including information regarding the right to appeal to the parent, guardian, or unaccompanied youth, if the LEA sends the child to a school other than the one requested;
- Enroll the child or youth immediately in the school in which enrollment is sought if a dispute rises over eligibility, school selection or enrollment in a school, pending final resolution of the dispute;
- Provide services comparable to those received by other students in the school; and
- Treat information about a homeless child's or youth's living situation with confidentiality, as a student education record.

¹⁵ 42 U.S.C. § 11432(g)(6)(A)(i), 42 U.S.C. § 11432(g)(3)(C)(i).

¹⁶ 42 U.S.C. § 11432(g)(3)(A)(i)(II), 42 U.S.C. § 11432(g)(3)(B).

¹⁷ 42 U.S.C. §11432(g)(1)(J)(iii), 42 U.S.C. §11432(g)(3)(A)(2) 42 U.S.C. §11432(g)(4)(A).

¹⁸ 42 U.S.C. §11432(g)(4)(B), 42 U.S.C. §11432(g)(4)(C), 42 U.S.C. §11432(g)(4)(D).

¹⁹ 42 U.S.C. §11432(g)(6)(A)(vi).

²⁰ 42 U.S.C. §11432(g)(6)(A)(v).

District Grant Applications

ESEA Consolidated Application

The Elementary and Secondary Education Act, as amended by the Every Student Succeeds Act (ESSA), Section 1115(c)(2)(E) indicates that serving homeless students is an integral part of Title I, Part A. Homeless students who attend any school served by an LEA, regardless of whether the school receives Title I, Part A funds, are eligible for Title I services. Specifically, school districts must reserve such funds as are necessary to provide services to homeless students who attend non-Title I schools that are comparable to those provided to students in Title I schools. These services may include providing educationally related support services to homeless children in shelters and other locations where they may live.²¹

Application

The ESEA Consolidated Application is a single, consolidated application for all ESEA formula entitlements, including the following: Title I-A, Title I-C, Title I-D, Title II-A, Title III-A, and Title IV-A. The consolidated application is completed using an electronic web-based application, known as the [Grants Management System \(GMS\)](https://gms.education.alaska.gov/) (gms.education.alaska.gov/).

For assistance in completing the Title I-A homeless set-aside portion of the ESEA Consolidated Application, consult the McKinney-Vento Program Funding PowerPoint (see Title I-A homeless set-aside section) for Title I-A located in the GMS Document Library or contact the McKinney-Vento State Coordinator.

- [Grants Management System](https://gms.education.alaska.gov/) (gms.education.alaska.gov/)
- [ESEA Consolidated Application Handbook](https://gms.education.alaska.gov/documentlibrary/) (gms.education.alaska.gov/documentlibrary/)

Funding Period

The funding period is from July 1 through June 30.

No more than 15% of the total Title I-A allocation, which includes the Title I-A homeless set-aside, can be carried forward from one fiscal year to another. A waiver may be requested every three years to carry over more than the 15% limitation.

Title I-A Homeless Set-aside Determination

Funds reserved for comparable services under section 1113(c)(3)(A)(i) of the ESEA may be determined based on a needs assessment of homeless children and youths in the district, taking into consideration the number of homeless children and youths identified by the LEA and their unique needs.²²

Title I-A Homeless Set-aside Needs Assessment

One method for the district needs assessment is to look at homeless student enrollment averages or trends in the district over a two- or three-year period and the average per-pupil cost of providing Title I-funded services in the current fiscal year and multiplying those two numbers. However, the needs of homeless children and youths that affect their enrollment, attendance, and success in school can be unique and distinct from housed students and should be reviewed periodically and regularly, at least more than once per school year. Other factors to consider are the presence of other State and Federal education grants that can provide the same or similar services as well as other community resources; these also change annually or regularly. Finally, the LEA should consider what is necessary and reasonable for each student to fulfill the purposes of the Title I and McKinney-Vento programs in their district, as well as the effectiveness of past activities in accomplishing the goals of those programs for individual students as well as the overall programs.²³

Title I-A Plan for Services

Under section 1112(b)(6) of the ESEA, a district must describe in its Title I, Part A plan the services it will provide homeless children and youths, including services provided with funds reserved under section 1113(c)(3)(A) of the ESEA, to support the enrollment, attendance, and success of these children and youths.

A district's Title I, Part A application also should include a description of the method used for determining the amount reserved, whether by a needs assessment or some other method (e.g., past homeless student enrollment and support service cost data), and how the liaison was consulted or involved in determining the set-aside.

²¹ [ESSA, Section 1113(c)(3)(A)]

²² [ESEA section 1113(c)(3)(C)(i)]

²³ Education for Homeless Children and Youths Program Non-Regulatory Guidance (M-7)

Allowable Uses of Funds

Title I, Part A funds may be used to provide a wide variety of services to homeless students. In addition to providing services to assist homeless students in meeting the State's challenging academic standards, Title I, Part A funds may be used to provide services to homeless children and youths, including those in Title I schools, that may not ordinarily be provided to other Title I students.²⁴ For example, to help homeless students effectively take advantage of educational opportunities, a district may use Title I, Part A funds to provide, where appropriate, items or services including, but 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 such as backpacks and notebooks;
- 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;
- 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 AP and IB testing;
- Fees for college entrance exams such as SAT or ACT; and
- GED testing for school-age students.

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.²⁵ 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, such as the USDA's National School Lunch Program and Breakfast Program, public health clinics, or local discretionary funds (sometimes provided by the PTA) used to provide similar services for economically disadvantaged students generally²⁶.

McKinney-Vento Subgrant

Distribution of formula grant funds to participating States, the District of Columbia, and Puerto Rico under the Education for Homeless Children and Youth program is proportionate to the distribution of funds under Section 1122 of the Elementary and Secondary Education Act of 1965, as amended (ESEA). The minimum grant that may be awarded to a State educational agency (SEA) in any given fiscal year is \$150,000.

SEAs must distribute not less than 75 percent of their allocation in subgrants to local educational agencies. States funded at the minimum level must distribute not less than 50 percent in subgrants to local educational agencies. States may reserve their remaining funds for State-level activities.

States must make competitive subgrants to eligible school districts (local educational agencies or LEAs) to facilitate the enrollment, attendance, and success in school of homeless children and youths. This includes addressing problems due to transportation needs, immunization and residency requirements, lack of birth certificates and school records, and guardianship issues.

²⁴ [ESEA section 1113(c)(3)(C)(ii)]

²⁵ [ESEA section 1113(c)(3)(A); 2 CFR § 200.403(a)]

²⁶ (See ESEA section 1115(e)(2))

Eligible Applicants

All Alaska school districts (local education agencies or LEAs) that reported 50 or more enrolled homeless students in the school year prior to the application period are eligible to apply. Districts may subcontract with other agencies; however, the local school district assumes responsibility for setting program goals and monitoring program accomplishments. The district will serve in the capacity of fiscal agent.

Application

The Request for Application (RFA) is issued on a three-year cycle through a competitive subgrant process.

Funding

Source: U.S. Department of Education, through the McKinney-Vento Homeless Education Assistance Improvements Act of 2001 (Title VII-B of the McKinney-Vento Homeless Assistance Act, as amended by the Every Student Succeeds Act).

Amount Available: Awards will be dependent on receipt of the federal grant funds. The total amount allocated to applicants is based on the availability of Federal funds and the competitive application process.

Size of Grants: Based on established need, grants are expected to be in the following ranges:

- Tier 1: 50-300 homeless students proposed to serve: grants range up to \$20,000 per year.
- Tier 2: 301-700 homeless students proposed to serve: grants range up to \$35,000 per year.
- Tier 3: More than 700 homeless students proposed to serve: grants range up to \$60,000 per year.

Grant Period: Fiscal year (July 1 or date of grant award to June 30); adjustment may be necessary based on reauthorization of the Elementary and Secondary Education Act.

Conditions of Grant Award

Awards are based on the identified needs of the children and youth served by the applying school district and on the quality of the application.

All funds are awarded according to the conditions of this Request for Application (RFA).

Funding Period

Districts receive allocations on an annual basis. Each fiscal year's funding period is July 1 through June 30. DEED reserves the right to withhold funding, release funding, or terminate funding if the application is not meeting program reporting requirements, performance goals and measures. This includes access to carry over (unexpended funds at the end of the fiscal year) funds.

After it has been awarded, the Alaska Department of Education & Early Development may terminate a grant by giving the grantee written notice of termination. In the event of termination after award, the Alaska Department of Education & Early Development shall reimburse the grantee of approved grant expenses incurred up to the notification of termination. This grant is subject to federal appropriations and may be reduced or terminated based on federal appropriated funds in any given fiscal year.

Allowable Activities

The following is a list of allowable activities (including measurable outcomes) in the McKinney-Vento Act (42 U.S.C. § 11433(d)(1-16)). While this list is not inclusive of all activities, subgrant activities must carry out the purposes of the McKinney-Vento Act listed in section 11431 of the Act.

ACTIVITIES	MEASURABLE OUTCOMES
1. The provision of tutoring, supplemental instruction, and enriched educational services that are linked to the achievement of the same challenging State academic standards as the State establishes for other children and youths.	<ul style="list-style-type: none">• Pre/post test score improvement.• Classroom teachers provide positive assessments of participants.• School success, seen in grade and score improvement.• Participation and performance on Standards of Learning Tests.• High school or GED completion.

ACTIVITIES	MEASURABLE OUTCOMES
2. The provision of expedited evaluations of the strengths and needs of homeless children and youths, including needs and eligibility for programs and services (such as educational programs for gifted and talented students, children with disabilities, and English learners, services provided under title I of the Elementary and Secondary Education Act of 1965 [20 U.S.C. 6301 et seq.] or similar State or local programs, programs in career and technical education, and school nutrition programs).	<ul style="list-style-type: none"> Evaluations are made, and records are transferred in a timely manner. Increased percentage of homeless children accessing education services for which they are eligible (e.g., Title I, special education, EL services).
3. Professional development and other activities for educators and specialized instructional support personnel that are designed to heighten the understanding and sensitivity of such personnel to the needs of homeless children and youths, the rights of such children and youths under this part, and the specific educational needs of runaway and homeless youths.	<ul style="list-style-type: none"> Increase in numbers of public-school personnel who are aware of and sensitive to the needs of homeless children and youth. Increase in awareness and sensitivity training opportunities for school personnel and community.
4. The provision of referral services to homeless children and youths for medical, dental, mental, and other health services.	<ul style="list-style-type: none"> Increase in percentage of families referred for services. Increase in percentage of homeless children who are immunized. Increase in percentage of pregnant homeless teens receiving prenatal care.
5. The provision of assistance to defray the excess cost of transportation for students under section 11432(g)(4) (A) of this title, not otherwise provided through Federal, State, or local funding, where necessary to enable students to attend the school selected under section 11432(g)(3) of this title.	<ul style="list-style-type: none"> Increase in percentage of homeless children and youth attending school regularly. Increase in the percentage of homeless children and youth attending the school of origin, with the approval of the parent/guardian. Decrease in number of day's homeless students cannot attend school due to lack of transportation.
6. The provision of developmentally appropriate early childhood education programs, not otherwise provided through Federal, State, or local funding, for preschool-aged homeless children.	<ul style="list-style-type: none"> Increase in the enrollment and attendance of homeless preschoolers in local preschool programs such as Even Start, Alaska Preschool Initiative, and Head Start.
7. The provision of services and assistance to attract, engage, and retain homeless children and youths, particularly homeless children and youths who are not enrolled in school, in public school programs and services provided to non-homeless children and youths.	<ul style="list-style-type: none"> Documentation of identification procedures and support services provided. Increase in the percentage of homeless youth completing school.
8. The provision for homeless children and youths of before- and after-school mentoring, and summer programs in which a teacher or other qualified individual provides tutoring, homework assistance, and supervision of educational activities.	<ul style="list-style-type: none"> Increase in hours of education programs for homeless children and youth, during non-school time. Improved school performance of participants as based on testing, grades, teachers' assessments, etc.
9. If necessary, the payment of fees and other costs associated with tracking, obtaining, and transferring records necessary to enroll homeless children and youths in school, including birth certificates, immunization or other required health records, academic records, guardianship records, and evaluations for special programs or services.	<ul style="list-style-type: none"> Decrease in amount of time used to obtain records of homeless children and youth. New schools of former LEA program participants receive information on students promptly; students are tracked into future schools and communities.

ACTIVITIES	MEASURABLE OUTCOMES
10. The provision of education and training to the parents and guardians of homeless children and youths about the rights of, and resources available to, such children and youths, and other activities designed to increase the meaningful involvement of parents and guardians of homeless children or youths in the education of such children or youths.	<ul style="list-style-type: none"> • Brochures, newsletters, posters, etc., distributed to parents and providers, on the rights of homeless children to an appropriate education. • Increase in homeless parent and youth calls regarding rights and resources. • Increase in percentage of homeless families involved in school enrollment decisions.
11. The development of coordination between schools and agencies providing services to homeless children and youths, as described in section 11432(g)(5) of this title.	<ul style="list-style-type: none"> • Increase in numbers of agencies participating in school programs. • Increase in number of homeless families and youth receiving case-managed services from collaborating agencies.
12. The provision of specialized instructional support services (including violence prevention counseling) and referrals for such services.	<ul style="list-style-type: none"> • Documentation of referrals and participation rates.
13. Activities to address the needs of homeless children and youths that may arise from domestic violence and parental mental health or substance abuse problems.	<ul style="list-style-type: none"> • Increase in education services (such as tutoring and adaptation of space for studying) for children at domestic violence shelters.
14. The adaptation of space and purchase of supplies for any non-school facilities made available under subsection (a)(2) to provide services under this subsection.	<ul style="list-style-type: none"> • Increase in number of shelters with homework rooms, libraries, and tutorial supplies.
15. The provision of school supplies, including those supplies, to be distributed at shelters or temporary housing facilities, or other appropriate locations.	<ul style="list-style-type: none"> • Increase in percentage of homeless children with supplies needed to attend and succeed in school.
16. The provision of other extraordinary or emergency assistance needed to enable homeless children and youths to attend school and participate fully in school activities.	<ul style="list-style-type: none"> • Increase in percentage of homeless children and youth attending school ready to learn. • Decrease in barriers that keep homeless children from attending school.

Annual Reporting

An annual data collection and evaluation is a required component of the McKinney-Vento Competitive Grant program. Each subgrantee must complete a form that applies to children and youth served by the McKinney-Vento subgrant for the Education of Homeless Children & Youth in any or all schools of the district for each school year. This submission includes information on what educational activities and support services are provided with McKinney-Vento funds, if any barriers to the enrollment and success of homeless children and youth occurred, the number of homeless children and youth identified, the number of students provided support services with McKinney-Vento funds, if there was an increase in this number over the past year, if the funds awarded were expended and spent in accordance with the subgrant application as submitted, include a brief description of the program results for the year determined by activities conducted, list major achievements and major challenges faced during the past year.

Contracts with Outside Vendors

Any district that receives a McKinney-Vento subgrant must adhere to the following when contracting with outside vendors:

- The grantee may sub-contract for services up to \$5,000 without prior approval from the DEED Program Manager.
- Before sub-contracting for services of \$5,000 or more the grantee must receive written approval from the DEED Program Manager.
- Sub-contracts of \$5,000 or more must be in written form and a copy sent to the DEED Program Manager for placement in the RSA/Grant file.

Activities Funded by the State

Annual Fall Training on the Education of Homeless Children and Youth (EHCY)

DEED provides annual training for homeless liaisons and other staff who support the Education for Homeless Children and Youth (EHCY).

Funding

DEED provides a travel grant for each school district's homeless liaison to attend the annual State (DEED sponsored) training. It is the district's responsibility to book any travel and accommodation for their local homeless liaison to attend the training.

Funding Period

The funding period is from July 1 through June 30. Carryover is not permitted.

Homeless Education Advisory Team (HEAT)

The Homeless Education Advisory Team (HEAT) meets monthly and is comprised of members from five (5) or more districts in Alaska. The advisory team helps DEED review and update McKinney-Vento related policies and procedures, supports the development of annual McKinney-Vento training and professional development opportunities, provides input and guidance related to the Homeless Education website content, federal program monitoring indicators, and the McKinney-Vento Subgrant. The HEAT will function solely as an advisory body, in compliance with the provisions of the McKinney-Vento Act.

Funding

DEED provides travel grants for Homeless Education Advisory Team (HEAT) members to attend the annual State (DEED sponsored) and National Association for the Education of Homeless Children and Youth (NAEHCY) trainings.

Grant

Allocations are provided to districts that have a representative serving on the HEAT. It is the district's responsibility to book any travel and accommodation for their State HEAT representative to attend the trainings.

Funding Period

The funding period is from July 1 through June 30. Carryover is not permitted.

Supplement, Not Supplant

The McKinney-Vento Act intends that services provided through subgrants to districts will expand upon or improve (and not replace) services provided as part of a school's regular academic program. [42 U.S.C. § 11433(a)(3)]. This provision is similar to the supplement not supplant provisions of other Federal programs, and subgrantees should demonstrate in a fiscal review that funds are not being used for activities and services that were formerly provided by the district or through other programs.

Supplement, Not Supplant Presumptions

Supplanting is presumed if either of the following is true:

- A district uses federal funds to provide services that are required under other federal, State, or local laws.
- A district uses federal funds to provide services that the district provided with non-federal funds in the prior year.

These presumptions may be overcome if the district can demonstrate that it would not have provided the services absent the availability of these federal funds.

Questions to Ask When Determining Supplement, Not Supplant

- If the district did not have federal funds available to conduct this activity/service, would the district still conduct it with State or local funds anyway?
 - If the answer is yes, the district is most likely supplanting because it is no longer a supplementary activity. The district must be able to demonstrate that the district could not conduct the activity if it were not for the federal funds.
- Is the program required by federal, State, or local law?
 - If the answer is yes, you are supplanting because the activity is required and not supplemental.

- Were local funds used to pay for the activity/service in the prior year?
 - If the answer is yes, you are supplanting because federal funds are being used to replace local funds and not to provide new opportunities.

Required Written Procedures Under UGG

The Uniform Grant Guidance (2 CFR, Part 200) requires all sub-recipients of federal funds to document certain grant procedures. These written procedures will help the sub-recipient meet compliance by outlining the steps necessary to ensure allowable grant costs and methods such as general procurement standards. Written procedures regarding the following areas are required of All sub-recipients must have these written procedures on file and the steps outlined in the procedures implemented.

- [Determining Allowable Costs](http://education.alaska.gov/esea/fedgrants/determining-allowable-costs-with-federal-fund.docx) (education.alaska.gov/esea/fedgrants/determining-allowable-costs-with-federal-fund.docx)
- [Cash Management](http://education.alaska.gov/esea/fedgrants/cash-management-of-federal-funds.docx) (education.alaska.gov/esea/fedgrants/cash-management-of-federal-funds.docx)
- [Conflict of Interest](http://education.alaska.gov/esea/fedgrants/conflict-of-interest.docx) (education.alaska.gov/esea/fedgrants/conflict-of-interest.docx)

Appendix

Acronyms/Abbreviations

<i>Acronym</i>	<i>Meaning</i>
CFR	Code of Federal Regulations
CTE	Career and Technical Education
DEED	Alaska Department of Education & Early Development
ED	US Department of Education
EHCY	Education for Homeless Children and Youth
EL	English Learner
ESEA	Elementary and Secondary Education Act
ESSA	Every Student Succeeds Act
FY	Fiscal Year
GED	General Educational Development
GMS	Grants Management System
HEAT	Homeless Education Advisory Team
IDEA	Individuals with Disabilities Education Act
LEA	Local Education Agency
NAEHCY	National Association for the Education of Homeless Children and Youth
RFA	Request for Applications
SEA	State Education Agency
UGG	Uniform Grant Guidance

Frequently Asked Questions (FAQs)

Do local educational agencies (LEAs) have the responsibility to identify children and youth experiencing homelessness?

Yes. Every LEA must designate a liaison for children and youth experiencing homelessness who is able to carry out their duties under the law. The McKinney-Vento Act requires liaisons to ensure that “homeless children and youths are identified by school personnel through outreach and coordination with other entities and agencies.” The purpose of identification is to provide support and offer appropriate services to the family, child and/or youth. Coordination with schools, local social services agencies, and other agencies or entities providing services to homeless children and youth and their families is an essential identification strategy, as are professional development, awareness and training activities within school buildings, LEAs, and the community.²⁷

In general, what may districts use Title I-A homeless set-aside and McKinney-Vento subgrant funds for?

- 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 such as backpacks and notebooks
- 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

²⁷ 42 U.S.C. §11432(g)(1)(J)(ii), 42 U.S.C. §11432(g)(6)(A)(i), 42 U.S.C. §11432(g)(5)(A)(i).

- 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
- 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 and International Baccalaureate testing*
- Fees for SAT or ACT testing*
- Fees for GED testing of school-aged students
- Transportation

*The services must be **reasonable and necessary** to assist homeless students in taking advantage of educational opportunities. *The funds must be used only as a last resort when other sources are not available.

Under what circumstances must an LEA provide adequate and appropriate transportation to school for students experiencing homelessness?

The McKinney-Vento Act requires LEAs to provide adequate and appropriate transportation for students experiencing homelessness in three situations. First, LEAs must provide adequate and appropriate transportation to the school of origin upon the request of a parent or guardian, or in the case of an unaccompanied youth, upon the request of the McKinney-Vento liaison. That is true regardless of whether the district provides transportation for other students or in other circumstances. Second, for other transportation (as opposed to the school of origin), the McKinney-Vento Act requires districts to provide transportation comparable to that provided to housed students. Therefore, if the district transports housed students to the local school or to a summer program, it must also transport students experiencing homelessness. Finally, LEAs must eliminate barriers to the school enrollment and retention of students experiencing homelessness. For example, if a student is living on or near an extremely busy intersection, in a very dangerous neighborhood, or is otherwise unable to attend school without transportation, the district must eliminate lack of transportation as a barrier to the child attending school.²⁸

Does the requirement for immediate enrollment include enrollment in option enrichment programs, extended-day programs, and other supplemental services?

Yes. Enrollment is defined to include attending classes and participating fully in school activities. Enrichment programs and other supplemental services are school activities. Further, McKinney-Vento State Plans are required to describe procedures to ensure that “homeless children and youths who meet the relevant eligibility criteria do not face barriers to accessing academic and extracurricular activities, including magnet school, summer school, career and technical education, advanced placement, on-line learning, and charter school programs, if such programs are available at the State and local levels.” Finally, McKinney-Vento liaisons are required to ensure that children and youth in homeless situations have a full and fair opportunity to succeed in school. Enrichment programs clearly support that requirement. To the extent that individual students experiencing homelessness can benefit from such programs, they must be provided access to the programs.²⁹

What if children experiencing homelessness cannot pay fees associated with extra-curricular activities, such as club dues, sports uniforms, etc.?

Barriers to full participation in school must be eliminated, including barriers “due to outstanding fees or fines....” Fees for extracurricular activities should be waived or paid with donations or district funds.³⁰

²⁸ 42 U.S.C. §11432(g)(1)(J)(iii); *see e.g.*, 2016 Guidance, J-4, 42 U.S.C. §11432(g)(4)(A), 42 U.S.C. §§11432(g)(1)(I), (g)(7).

²⁹ 42 U.S.C. §11434A(1), 42 U.S.C. §11432(g)(1)(F)(iii), 42 U.S.C. §11432(g)(6)(A).

³⁰ 42 U.S.C. §§11432(g)(1)(I), (g)(7).

Can students who are homeless receive free school meals without documenting income? What about students with and outstanding balance of unpaid school meal fees?

Yes, and yes. The Child Nutrition and WIC Reauthorization Act of 2004 made any child or youth identified as homeless by a McKinney-Vento liaison or shelter director automatically eligible for free school meals. They do not have to complete an application. When a liaison or a shelter director provides a child's name to the local school food service office, free school meals should commence immediately.

Children identified as homeless by a McKinney-Vento liaison or shelter director are entitled to receive those meals immediately, regardless of unpaid fees. Unpaid fees may be waived or paid from other funds, but they cannot delay or prevent the student's access to free meals. To the extent unpaid fees constitute a barrier to the enrollment of homeless children and youth (including attending classes and participating fully in school activities), States and LEAs have an ongoing obligation to review and revise their policies to remove such barrier.³¹

To what extent should services for dental, medical, and other such needs be provided for children experiencing homelessness?

To the extent that such services are available at school, children experiencing homelessness must have access to them. Outside of school, McKinney-Vento liaisons are required to provide referrals for health, mental health, dental, substance abuse, housing and other appropriate services in the community. "Other appropriate services" may include job training, public assistance, food and nutrition, transportation assistance, and legal services.³²

What ages does the McKinney-Vento Act cover?

The McKinney-Vento Act applies to children and youth aged 21 and under, consistent with their eligibility for public education services under State and federal law. State laws vary but generally provide access to all students until high school graduation or equivalent, or until age 18 (or over in some States). The McKinney-Vento Act also applies to homeless preschool-aged children and requires liaisons to ensure that they have access to and receive services, if eligible, under LEA-administered preschool programs. 2016 Guidance. For special education students, federal law provides the right to access services until age 22.³³

Is every LEA required to have a homeless liaison?

Yes. The McKinney-Vento Act requires every local educational agency to "designate an appropriate staff person" who is able to carry out their McKinney-Vento duties to serve as a liaison.³⁴

Are migratory and immigrant students covered by the McKinney-Vento Act?

Yes. migratory and immigrant students are covered by the Act if they are living in a homeless situation.³⁵

How do the McKinney-Vento Act requirements apply to preschool children?

To the extent that an LEA offers a public education to preschool children, including LEA-administered Head Start programs, an LEA must meet the McKinney-Vento Act requirements for homeless children in preschool, including ensuring that a homeless child remains in his or her public preschool of origin, unless a determination is made that it is not in the child's best interest.³⁶

³¹ 42 U.S.C. §11432(e)(C)(i)(III)(cc), 42 U.S.C. §11432(g)(1)(I), 42 U.S.C. §11432(g)(4)(E).

³² 42 U.S.C. §11432(g)(6)(A)(iii).

³³ 20 U.S.C. §1412(a)(1)(A).

³⁴ 42 U.S.C. §11432(g)(1)(J)(ii).

³⁵ 42 U.S.C. §11434A(2)(b)(iv).

³⁶ 42 U.S.C. §§11432(g)(1)(F)(i), 2016 Non-Regulatory Guidance, N-4 and N-5.

What criteria should be used to determine if housing is “substandard”?

The U.S. Department of Education has determined that factors to consider in determining whether housing is “substandard” include whether the housing “lacks one of the fundamental utilities such as water, electricity, or heat; is infested with vermin or mold; lacks a functional part such as a working kitchen or a working toilet; or may present unreasonable dangers to adults, children, or persons with disabilities.” The Department further suggests reviewing State and local housing codes for definitions of substandard housing.³⁷

What is meant by the School of Origin?

School of origin is defined as the school the student attended when permanently housed, or the school in which the student was last enrolled, including a preschool and a designated receiving school at the next grade level for a feeder school.³⁸

What factors are considered for keeping students at their School of Origin?

When choosing the school, a child experiencing homelessness should attend, the choice must be made “according to the child’s or youth’s best interest. Changing schools significantly impedes students’ academic and social progress.”³⁹

How does the McKinney-Vento Act define “unaccompanied youth”? Is there an age range?

Unaccompanied youth is defined as a homeless child or youth not in the physical custody of a parent or guardian. The Act does not provide an age range. Thus, a student whose parent retains legal custody of a youth, but not physical custody, is considered an unaccompanied youth.⁴⁰

Should schools enroll youth without proof of guardianship?

Yes. Lack of a legal guardian or guardianship documents cannot delay or prevent the enrollment of an unaccompanied youth. LEAs must ensure immediate enrollment, as the McKinney-Vento Act requires States and LEAs to eliminate barriers to identification, enrollment and retention and to enroll unaccompanied youth in school immediately. LEAs may adopt their own policies to meet these mandates.⁴¹

Who can make educational decisions for unaccompanied youth?

FERPA allows “an individual acting as a parent in the absence of a parent or a guardian” to access a student’s education records, thereby permitting schools to discuss educational issues with such caregivers.⁴²

³⁷ 2016 Non-Regulatory Guidance, A-3.

³⁸ 42 U.S.C. §11432(g)(1)(J)(iii).

³⁹ 42 U.S.C. § 11432(g)(3)(A).

⁴⁰ 42 U.S.C. § 11434A(6).

⁴¹ 42 U.S.C. §§11432(g)(3)(C), (g)(1)(H)(iv), 42 U.S.C. §§11432(g)(1)(I), (g)(7).

⁴² 34 CFR §§99.3-99.4.

Uniform Grant Guidance

Organization of the Uniform Guidance

- Subpart A – Acronyms and Definitions
- Subpart B – General Provisions
- Subpart C – Pre-Federal Award Requirements and Contents of Federal Awards
- Subpart D – Post Federal Award Requirements
- Subpart E – Cost Principles
- Subpart F – Audit Requirements
- Appendices III-V and VII – Indirect Cost/Cost Allocation Plans
- Appendix XI – Compliance Supplement

Cost Principles

Fundamental Principles

- responsibility for efficient and effective administration through the application of sound management practices;
- responsibility for administering an award in a manner consistent with underlying agreements, program objectives, and the terms and conditions;
- having accounting practices consistent with principles in Subpart E and documenting all costs;
- responsibility for employing sound organization and management techniques to assure proper and efficient administration; and
- not earn or keep profit, unless authorized by the terms and conditions of the award.

Allowability⁴³

General Considerations in Determining Allowability:

- Is the cost reasonable and necessary for the program?
- Is the expense in compliance with laws, regulations and grant terms?
- To what extent is the expense allocable to the grant?
- Is the cost adequately documented?
- Is it consistent with grantee rules that apply to both Federally funded and non-Federally funded activities?

Reasonable⁴⁴

A cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.

General Considerations in Determining Reasonableness:

- Do sound business practices support the expenditure?
- What is reasonable?
- Is the cost ordinary and necessary?
- Has proper consideration been given to factors such as arm's-length bargaining, sound business practices, other Federal requirements?
- Are the costs comparable to market prices for comparable goods or services in the geographic area?
- Have all concerned acted with prudence, considering their responsibilities to the organization, community, and others?
- Does it adhere to established practices and policies?

Allocable Costs⁴⁵

Allocable means the good or service can be assigned to an award or cost objective in accordance with the relative benefit achieved.

If a cost benefits two or more projects, activities, or programs in proportions that can be determined without undue effort or cost, the cost should be allocated to the projects based on the proportional benefit.

⁴³ 2 CFR §200.403.

⁴⁴ 2 CFR §200.404.

⁴⁵ 2 CFR §200.405.

Allowable Cost Checklist for EHCY and Title I-A homeless set-aside Funds

Except where otherwise authorized by statute, costs must meet the following general criteria in order to be allowable under Federal awards. Answering “Yes” to all the following questions implies that a cost may be allowable.

Is the cost:

Necessary (2 CFR § 200.403(a))

- Is the cost necessary to carry out the plan of the Federal program? ☐ Yes ☐ No

Reasonable (2 CFR § 200.404)

- Did the agency follow its purchasing or procurement procedures? ☐ Yes ☐ No
- Is the cost in line with fair market prices for comparable goods or services? ☐ Yes ☐ No
- Would a “prudent person” agree that the item is reasonable? ☐ Yes ☐ No

Conforming to Limitations or Exclusions (2 CFR § 200.403(b))

- Is the cost permissible and NOT disallowed under the 55 specific items of cost found in the Uniform Grant Guidance 2 CFR § 200.420-475? ☐ Yes ☐ No
- Is the cost permissible under the program statute and regulations? ☐ Yes ☐ No
- Is the cost permissible under the terms and conditions of the sub award? ☐ Yes ☐ No
- Is the cost permissible under State statute? ☐ Yes ☐ No
- Is the cost permissible under the agency policies? ☐ Yes ☐ No

Consistent with Policies and Procedures (2 CFR § 200.403(c))

- Are the agency’s policies and procedures consistent among funding sources? ☐ Yes ☐ No
- Do the agency’s policies and procedures apply the same rules for Federal programs as they do for State and local programs? ☐ Yes ☐ No
- Would the cost be the same amount if it was funded by a State or local program? ☐ Yes ☐ No

Accorded Consistent Treatment (2 CFR § 200.403(d))

- Is the cost excluded from the agency’s indirect cost rate? ☐ Yes ☐ No
- Is the cost treated the same for the Federal program as it is for State and local programs? ☐ Yes ☐ No

Allocable (2 CFR § 200.405(a))

- Is the cost incurred specifically for the Federal program? ☐ Yes ☐ No
- If the cost benefits the Federal program and other work of the agency, was the cost distributed in proportions that may be approximated using reasonable methods? ☐ Yes ☐ No
- Was the cost not incurred because another grant ran out of funds? ☐ Yes ☐ No

Determined in Accordance with Generally Accepted Accounting Principles (2 CFR § 200.403(e))

- Is the cost determined in accordance with Generally Accepted Accounting Principles (GAAP) or as otherwise provided for in the Uniform Grant Guidance? ☐ Yes ☐ No

Not used for cost sharing or matching requirements (2 CFR § 200.403(f))

- Is the cost not being used to meet cost sharing or matching requirements of any other Federally financed program? ☐ Yes ☐ No

Adequately Documented (2 CFR § 200.403(g) and 2 CFR § 200.302(b)(3))

- Do you have the documentation demonstrating the need, the purchase, and use of the item? ☐ Yes ☐ No
- Do you have records that identify the source and application of funds and contain information regarding authorizations, obligations, unobligated balances, assets, expenditures, income and interest that are supported by source documentation? ☐ Yes ☐ No

Supplemental

- Does the cost meet the supplemental requirements of the Federal grant program? ☐ Yes ☐ No

Additional Resources

U.S. Department of Education

Legislation

- [Every Student Succeeds Act \(ESSA\) | U.S. Department of Education](https://ed.gov/laws-and-policy/laws-preschool-grade-12-education/every-student-succeeds-act-essa) (ed.gov/laws-and-policy/laws-preschool-grade-12-education/every-student-succeeds-act-essa)
- [42 USC CHAPTER 119, SUBCHAPTER VI, Part B: Education for Homeless Children and Youths](https://uscode.house.gov/view.xhtml?path=/prelim@title42/chapter119/subchapter6/partB&edition=prelim) (uscode.house.gov/view.xhtml?path=/prelim@title42/chapter119/subchapter6/partB&edition=prelim)
- [Family Education Rights and Privacy Act \(FERPA\)](https://studentprivacy.ed.gov/) (studentprivacy.ed.gov/)

Regulations

- [Federal Register: McKinney-Vento Education for Homeless Children and Youths Program](https://federalregister.gov/documents/2016/03/17/2016-06073/mckinney-vento-education-for-homeless-children-and-youths-program) (federalregister.gov/documents/2016/03/17/2016-06073/mckinney-vento-education-for-homeless-children-and-youths-program)

Guidance

- [Non-Regulatory Guidance: Education for Homeless Children and Youths Program](https://ed.gov/sites/ed/files/policy/elsec/leg/essa/160240ehcyguidance072716.pdf) (ed.gov/sites/ed/files/policy/elsec/leg/essa/160240ehcyguidance072716.pdf)
- [Letter for ESSA Title IA LEA homeless set-aside](https://ed.gov/sites/ed/files/policy/elsec/leg/essa/letterforessatitleialeahomelesssetaside.pdf) (ed.gov/sites/ed/files/policy/elsec/leg/essa/letterforessatitleialeahomelesssetaside.pdf)
- [Non-Regulatory Guidance: Fiscal Changes and Equitable Services Requirements ESSA](https://ed.gov/sites/ed/files/2020/07/essaguidance160477.pdf) (ed.gov/sites/ed/files/2020/07/essaguidance160477.pdf)

Webpages

- [Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards | U.S. Department of Education](https://ed.gov/grants-and-programs/manage-your-grant/uniform-administrative-requirements-cost-principles-and-audit-requirements-for-federal-awards-us-department-of-education) (ed.gov/grants-and-programs/manage-your-grant/uniform-administrative-requirements-cost-principles-and-audit-requirements-for-federal-awards-us-department-of-education)
- [Education Department General Administrative Regulations \(EDGAR\) and Other Applicable Grant Regulations | U.S. Department of Education](https://ed.gov/grants-and-programs/manage-your-grant/education-department-general-administrative-regulations-edgar-and-other-applicable-grant-regulations) (ed.gov/grants-and-programs/manage-your-grant/education-department-general-administrative-regulations-edgar-and-other-applicable-grant-regulations)
- [Every Student Succeeds Act \(ESSA\) | U.S. Department of Education](https://ed.gov/laws-and-policy/laws-preschool-grade-12-education/every-student-succeeds-act) (ed.gov/laws-and-policy/laws-preschool-grade-12-education/every-student-succeeds-act)

Alaska Department of Education & Early Development

- [Federal Grants Management](https://education.alaska.gov/grants/fed-grants) (education.alaska.gov/grants/fed-grants)
- [Grants Management System \(GMS\)](https://gms.education.alaska.gov/) (gms.education.alaska.gov/)
- [ESEA Consolidated Application Handbook](https://gms.education.alaska.gov/DocumentLibrary/) (gms.education.alaska.gov/DocumentLibrary/)
- [Title VII-B of the McKinney-Vento Homeless Assistance Act, as amended by the ESSA](https://education.alaska.gov/ESEA/TitleVII-B) (education.alaska.gov/ESEA/TitleVII-B)