



February 24, 2020

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Office of Planning, Evaluation and Policy Development  
U.S. Department of Education  
400 Maryland Avenue SW  
LBJ Building, Room 6W-208B  
Washington, D.C. 20202-4537

Submitted via online portal: <https://www.regulations.gov>

Re: Study of District and School Uses of Federal Education Funds, Docket Number ED-2019-ICCD-0160

Dear Ms. Valentine:

SchoolHouse Connection (SHC) applauds the Department of Education's decision to study how school districts and schools are using funding authorized by the Elementary and Secondary Education Act. We urge the Department to include in its study how school districts and schools are using Title I Part A funds for students experiencing homelessness, as required by the Every Student Succeeds Act (ESSA).

Congress recognized the barriers that homelessness creates to educational access and success, and the need to provide educationally-related support services to help homeless students achieve, by creating new requirements and strengthening opportunities in ESSA. ESSA requires all state and local educational agencies to report disaggregated information on the graduation rates and academic achievement of homeless children and youth (20 U.S.C. §6311(h)(1)(C)(ii) and (iii)). ESSA also requires that all local educational agencies (LEAs) that receive Title I Part A funds reserve funds to support homeless students (20 U.S.C. §6313(c)(3)(A)) and mandates that the amount of such set-asides for homeless students be based on the total allocation received by the LEA, and reserved prior to any allowable expenditure of transfers by the LEA (20 U.S.C. §6313(c)(3)(B) and (C)(i)). In addition, ESSA permits Title I funds that are reserved for homeless children and youth to be used for services

not ordinarily provided by Title I, including local liaisons and transportation to the school of origin (20 U.S.C. §6313(c)(3)(C)(ii)).

Based on our extensive contact with state and local educational agencies, we are concerned that many LEAs are not setting aside adequate amounts of Title I Part A funds for homeless students, nor strategically determining the best and most effective uses of these funds. Therefore, SHC urges that the Department include in its information collection a request for LEAs to provide both the amount and a description of the use of funds reserved for homeless students under Title I Part A, as amended by ESSA. This request would elicit valuable information that could be used to determine the extent to which LEAs are providing adequate resources to homeless students under Title I Part A; it also could facilitate analyses of the effectiveness and use of Title I Part A programs and services for students experiencing homelessness. In sum, it could inform policy, practice, and programming to ensure that homelessness does not hinder the school success of some of our nation's most vulnerable students.

Addressing the educational barriers faced by students experiencing homelessness is more urgent than ever before. The Department's data for the 2017-2018 school year show that public schools identified and enrolled over 1.5 million homeless children and youth in public schools – an 11% increase over the previous school year, and the highest number on record.<sup>1</sup> Graduation and proficiency rates for homeless students are significantly below those of economically disadvantaged students, demonstrating the negative impact of homelessness on academic achievement over and above poverty. For example, in 2017-2018, four-year on-time state graduation rates for homeless students ranged from 44%-87%, while five-year on-time state graduation rates ranged from 41%-83%. Approximately 29% of students experiencing homelessness achieved academic proficiency in reading (language arts), 24% achieved proficiency in mathematics, and 26% achieved proficiency in science. Research also shows that not completing high school is the greatest single risk factor for experiencing homelessness as a young person, making education a critical intervention.<sup>2</sup>

Clearly, more must be done to support the academic success of students experiencing homelessness. Knowing if and how LEAs are implementing the requirement to reserve Title I Part A funds for homeless students under ESSA is essential to this effort. Requesting such information is appropriate for the Department in its oversight role, and could be sought without unduly burdening the collection's respondents.

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<sup>1</sup> Federal Data Summary, Federal School Years 2015-16 Through 2017-18, Education for Homeless Children and Youth, National Center for Homeless Education, January 2020. Retrieved from: <https://nche.ed.gov/wp-content/uploads/2020/01/Federal-Data-Summary-SY-15.16-to-17.18-Published-1.30.2020.pdf>

<sup>2</sup> Morton, M.H., Dworsky, A., & Samuels, G.M. (2018). Missed Opportunities: Education Among Youth Experiencing Homelessness in America. Chicago, IL: Chapin Hall at the University of Chicago. Retrieved from: <https://voicesofyouthcount.org/brief/missed-opportunities-education-among-youth-experiencing-homelessness-in-america/>

We appreciate your consideration of these recommendations. Should you have any questions, please do not hesitate to contact us at 202.364.7392 or [barbara@schoolhouseconnection.org](mailto:barbara@schoolhouseconnection.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Barbara Duffield". The signature is written in a cursive style with a large initial "B".

Barbara Duffield  
Executive Director