# 2024 McKinney-Vento Grant FAQ

1. "Collaboration means that the community agency(ies) should assist the LEA in preparing and implementing the McKinney-Vento Homeless Education Grant." Does this mean help write this grant or does this mean to help in collaborating services to MVP students and families or both?

**Both.** The Request for Application (RFA) states that local educational agencies (LEAs) must collaborate with at least one community-based organization, public agency, or other nonprofit organization to qualify for funding through this grant. For this application, collaboration means that the community agency(ies) should assist the LEA **in preparing and implementing** the McKinney-Vento Homeless Education Grant. Applicants chosen for grant awards will be those who show strong evidence of true collaboration with one or more community partners (i.e., the partnership is more than a partnership on paper).

1. This is a 3-year grant, but says it is only funded for 1 year. If the district is awarded the money, is it for the entire 3 years or annually? “**Note:**Grants shall be for a term of one year, renewable for up to two additional 1-year terms based on the availability of Federal Homeless Education funds and **grantee performance each year."**

Grants are for a term of one year, renewable for up to two additional 1-year terms based on the availability of Federal Homeless Education funds and grantee performance each year. Districts that are chosen will be awarded an amount for the 2024-2025 school year and this amount will be renewed in 2025-2026 and 2026-2027 depending on the availability of the grant to continue and the performance of each grantee (regarding items like seeking quarterly reimbursements, successfully completing monitoring, and other items noted in the RFA).

1. Can funds be used towards supporting reimbursement to our transportation department for extra routes, hours, and drivers needed to ensure homeless students are able to report to their homeschool despite their living situation?

Yes, McKinney-Vento subgrant funds may be used to defray the excess cost of school-of-origin transportation as outlined in the federal [Education for Homeless Children and Youths Program Non-regulatory Guidance](https://nam11.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww2.ed.gov%2Fpolicy%2Felsec%2Fleg%2Fessa%2F160240ehcyguidance072716.pdf&data=05%7C02%7Ckderfp%40education.ky.gov%7C4726472b6edf479e926308dc2d7166da%7C9360c11f90e64706ad0025fcdc9e2ed1%7C0%7C0%7C638435212356033641%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=O3BfTqJ6%2F7sLb9p4wAD1ZZwhjhv5yuGG3F%2BFkjb6jdo%3D&reserved=0) (question J-7). Please note transportation funds will be coded as “B” (Reducing Barriers) for Section 6 of [704 KAR 7:090](https://nam11.safelinks.protection.outlook.com/?url=https%3A%2F%2Fapps.legislature.ky.gov%2Flaw%2Fkar%2Ftitles%2F704%2F007%2F090%2F&data=05%7C02%7Ckderfp%40education.ky.gov%7C4726472b6edf479e926308dc2d7166da%7C9360c11f90e64706ad0025fcdc9e2ed1%7C0%7C0%7C638435212356043404%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=VKLRJUbpwo3vrRiqYSw95hpoHxl0irE7GM05mL71%2BlA%3D&reserved=0). The excess cost is the difference between what an LEA normally spends to transport a student to school and the cost of transporting a homeless student to school. If the LEA provides transportation through a regular bus route, there is no excess cost. If the LEA provides special transportation only for the homeless student (e.g., through a private vehicle or transportation company), the entire cost can be considered excess. If the LEA must re-route busses to transport a homeless student enrolled in one of its schools, the additional cost of this rerouting can be considered excess cost.

1. Can a van be purchased to help transport homeless students that have moved far enough out of the district and bus transportation would not be ideal due to being on the bus for over multiple hours a day?

Maybe. All expenditures must meet federal and Kentucky Department of Education (KDE) requirements before the district begins to implement any activities. Purchasing a vehicle would be coded as “B” (Reducing Barriers) for Section 6 of [704 KAR 7:090](https://nam11.safelinks.protection.outlook.com/?url=https%3A%2F%2Fapps.legislature.ky.gov%2Flaw%2Fkar%2Ftitles%2F704%2F007%2F090%2F&data=05%7C02%7Ckderfp%40education.ky.gov%7C4726472b6edf479e926308dc2d7166da%7C9360c11f90e64706ad0025fcdc9e2ed1%7C0%7C0%7C638435212356050027%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=WjMzG3YLiznlwynuclTFfaGwBy2ifkTj2EBLBNSXDdY%3D&reserved=0). This would reduce the amount of funds available to meet other needs through the grant and may prevent the grantee from meeting reasonable, allocable, necessary, and document (RAND) requirements established in CFR 200.403, 200.404, and 200.405:

* Reasonable: The proposed goods and services are not excessive in cost and are based on prudent and sound purchasing practices.
* Allocable: The goods and services specifically meet the program’s intent.
* Necessary: The goods and services are essential for carrying out programmatic requirements.
* Documented: The district must be able to readily document the reasonableness, necessity and allocability of the expense through an established allowability procedure, needs assessment, standard purchasing processes or district policy.

1. Can electronic learning devices be purchased for homeless students to utilize at home such as Leapfrog?

Maybe. All electronic devices must be properly inventoried, and all expenditures must meet federal and Kentucky Department of Education (KDE) requirements before the district begins to implement any activities. Likewise, the district may not use funds from this program to supplant funds from nonfederal sources. Districts may not use funds from this program to replace the regular academic program. Districts must maintain documentation that clearly demonstrates the supplementary nature of these funds. The supplement, not supplant provision, also includes programs and services provided to all students through local family resource and youth services centers. All expenditures also meet reasonable, allocable, necessary, and documented (RAND) requirements established in CFR 200.403, 200.404, and 200.405:

* Reasonable: The proposed goods and services are not excessive in cost and are based on prudent and sound purchasing practices.
* Allocable: The goods and services specifically meet the program’s intent.
* Necessary: The goods and services are essential for carrying out programmatic requirements.
* Documented: The district must be able to readily document the reasonableness, necessity and allocability of the expense through an established allowability procedure, needs assessment, standard purchasing processes or district policy.

1. Can funds be used to support our preschool students that are homeless?

Yes. This grant can be used to support public preschool students. Please see the federal [Education for Homeless Children and Youths Program Non-regulatory Guidance](https://nam11.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww2.ed.gov%2Fpolicy%2Felsec%2Fleg%2Fessa%2F160240ehcyguidance072716.pdf&data=05%7C02%7Ckderfp%40education.ky.gov%7C4726472b6edf479e926308dc2d7166da%7C9360c11f90e64706ad0025fcdc9e2ed1%7C0%7C0%7C638435212356056568%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=qQJZRFFE8FHp8VT8zHTpIl9W8QZ3IPtj4ty7vRPpoyE%3D&reserved=0) (questions N1-N5).

1. Would the homeless funds in Title I be considered the "matching" funds we identify in the application?

Matching funds may be included from Title I, Part A McKinney-Vento set-aside, partners, in-kind donations, and other local sources. This is a required element to show the program will be holistically supported and will not supplant prior spending.

1. The RFA states that only 15% of the budget can pay for a salary for a liaison. However, on page 8 it states, "unless the liaison is providing direct services from a category below with the appropriate time and effort documented". Does this mean that 15% of the salary can be requested under spending category M and additional percentages of the salary can be assigned to spending category E and B?

Yes, if the liaison is providing direct educational services or reducing barriers for students experiencing homelessness, those percentages of the salary may be assigned to the categories of E or B

1. Do we need to submit a letter of intent to apply?

No.

1. Please define before and after school care since we can’t pay for it from the grant.

Before and after school care would include supplementary tutoring, educational enrichment, or extracurricular opportunities at the school. These funds cannot be used to pay for or replace an existing after-school program. Third-party childcare is not an eligible expense according to the National Center for Homeless Education (NCHE).

1. If you have a part-time clerical person that works only for homelessness, can their salary be included even if the LEAs salary is out of general funds? They do data entry, transportation requests, help with family phone calls, and general support for the LEA since the case load is so large.

Yes, this is an example of a salary that may be allocated to category B according to the description given. It is recommended that the LEA further consult with their local counsel using the job description and Section 6 of [704 KAR 7:090.](https://apps.legislature.ky.gov/law/kar/titles/704/007/090/)

1. Would salary for a McKinney-Vento van driver be coded under E since they are ensuring that students get to/from school?

No, all transportation is coded as B for Reducing Barriers.

1. Do academic instruction/interventions have to be provided by a certified staff member?

Not necessarily. This decision is a local one and should align to local practices and procedures, as well as local salary schedules.

1. Does afterschool tutoring fall under spending category E or B?

After-school tutoring is an E, Educational Expense, because it must be supplemental in nature and educationally focused.

1. Is welfare like clothing and emergency food under spending category B or M?

These welfare items would align to category B, Reducing Barriers.

1. Under application components, in the attachment "LEA's notice of rights for homeless students" are you asking for district policy or our written notification of rights and services?

This is a written notification of rights for homeless students and the LEA process for disputes. The Kentucky Department of Education offers sample documents with student rights on the [McKinney-Vento Student Intake Form](https://www.education.ky.gov/federal/progs/txc/Documents/MV%20Student%20Intake%20Form.pdf) and a [Kentucky Homeless Dispute](https://www.education.ky.gov/federal/progs/txc/Documents/Homeless%20Dispute%20Resolution%20Form.pdf) Resolution Sample Form. These forms may be of use when completing your application.

1. Under part 5 for the direct services provider contract, is a MOU sufficient?

Yes, if a binding written agreement exists and meets local policies and practices.

1. Do you have a recommended method for recording how the liaison's salary is being spent among different spending categories?

Please see Question 8 in the FAQ.

1. Can you provide some examples of "providing direct services for Educational Services or Reducing Barriers?

Direct education services include providing tutoring or instruction to students experiencing homelessness. Direct services for reducing barriers would be providing transportation, clothing, food assistance, mental health etc. Supervising a homeless education program while others provide or complete these tasks would not be considered providing a direct service.

1. Can resources be used ONLY for MV students, or can all students use the resources?

In general, resources must be used only for McKinney-Vento students; however, there may be times when other at-risk students could benefit also from the resources. Federal [Education for Homeless Children and Youths Program Non-regulatory Guidance](https://nam11.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww2.ed.gov%2Fpolicy%2Felsec%2Fleg%2Fessa%2F160240ehcyguidance072716.pdf&data=05%7C02%7Ckderfp%40education.ky.gov%7C4726472b6edf479e926308dc2d7166da%7C9360c11f90e64706ad0025fcdc9e2ed1%7C0%7C0%7C638435212356033641%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=O3BfTqJ6%2F7sLb9p4wAD1ZZwhjhv5yuGG3F%2BFkjb6jdo%3D&reserved=0) (question H-2) states, “...If services are provided on school grounds, the schools may use McKinney-Vento funds to provide the same services to other children and youths who are determined by the LEA to be at risk of failing in, or dropping out of, school. (Section 723(a)(2)(B)(i))...” Additionally, (question H-3) states, “... If no after-school programs are provided by the school, or the programs provided do not meet the needs of homeless children and youths, McKinney-Vento funds may be used for after-school services for homeless children and youths and for non-homeless children and youths who are at risk of failing in, or dropping out of, school. (Sections 723(d)(8), 723(a)(2)(B)(i)).”

1. Are the Title I funds separate from what the district has already set aside for the year?

No. This grant does not require additional matching Title I Part A funds, above the amount the district reserves in the set-aside. Federal [Education for Homeless Children and Youths Program Non-regulatory Guidance](https://nam11.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww2.ed.gov%2Fpolicy%2Felsec%2Fleg%2Fessa%2F160240ehcyguidance072716.pdf&data=05%7C02%7Ckderfp%40education.ky.gov%7C4726472b6edf479e926308dc2d7166da%7C9360c11f90e64706ad0025fcdc9e2ed1%7C0%7C0%7C638435212356033641%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=O3BfTqJ6%2F7sLb9p4wAD1ZZwhjhv5yuGG3F%2BFkjb6jdo%3D&reserved=0) (question M-4) describes the types of services an LEA may provide to homeless students with Title I homeless set-aside funds.

1. Do you also want information about the match in the Narrative Description?

No, please list this in the budget to save room on the narrative page count.

1. Do the benefits/fringe count in the 15% for spending category M?

Yes, fringe benefits count proportionally with the salary in each code.

1. For clarification purposes when we write the grant, we can just use 4.1 Project Description or 5.4 Grant Management without listing the whole question as we had last grant cycle...correct?

Yes, applicants should write their application narrative in the order listed in the rubric and use the numbering system to organize their application responses, ex. 1.1, 1.2, 2.1, etc. But are not required to list the question/prompt within the application narrative.

1. If we are awarded the grant and go to the conference, would the conference be able to be paid for out of our grant? Or would we need to pull funding from another source? What spending category (E, B, M) would that be funded from?

The NAEHCY conference, including travel and registration, would be an allowable expense under B for Reducing Barriers.

1. Do all schools have to be Title 1 schools that will participate in the grant?

No.

1. Is it okay to use Title 1 Part A as matching funds?

Yes.

1. How do we record where matching funds are coming from in the budget form?

` Please list the name next to the amount in the column Matching Funds on Attachment Six.

1. Is the matching column on the budget only referring to the Title I requirement for homeless?

No. Matching funds may be included from Title I, Part A McKinney-Vento set-aside, partners, in-kind donations, and other local sources, this is a required element to show the program will be holistically supported and will not supplant prior spending.

1. On the budget line if you have Title I set asides do you want to show that breakdown within the matching column on the budget?

No, please list the total amount and list it as the Title I set-aside.

1. Is there a restriction on hourly pay amounts for tutoring/academic interventions?

Not necessarily. This decision should follow the local salary schedules. Districts may not use funds from this program to replace the regular academic program. Districts must maintain documentation that clearly demonstrates the supplementary nature of these funds. The supplement, not supplant provision, also includes programs and services provided to all students through local family resource and youth services centers. All expenditures also meet reasonable, allocable, necessary, and documented (RAND) requirements established in CFR 200.403, 200.404, and 200.405:

* Reasonable: The proposed goods and services are not excessive in cost and are based on prudent and sound purchasing practices.
* Allocable: The goods and services specifically meet the program’s intent.
* Necessary: The goods and services are essential for carrying out programmatic requirements.
* Documented: The district must be able to readily document the reasonableness, necessity and allocability of the expense through an established allowability procedure, needs assessment, standard purchasing processes or district policy.

1. Are indirect costs an allowable expenditure? Which spending category (E, B, M) would they code?

Awards are subject to the non-supplanting and restricted rate requirements of EDGAR at 34 CFR 76.563. Indirect costs are allowed.  The LEA's restricted indirect cost rate is available at [Indirect Costs 2023-2024](https://www.education.ky.gov/_layouts/download.aspx?SourceUrl=https://www.education.ky.gov/districts/FinRept/Documents/Indirect%20Costs%202023-2024%20ADA.xlsx). Indirect costs are costs that have been incurred for common joint purposes and not direct grant costs.

1. Is it a conflict of interest if the community partnership is led by school employees?

Yes.

1. Could you confirm if I can list the following expense under the educational services category? Provision of services and assistance to attract, engage, and retain homeless children and youth and unaccompanied youth in public school programs . Documentation of identification procedures and support services provided · Increase in the percentage of homeless youth completing school. Expense (educational?) A Social worker dedicated to assisting in the identification of homeless students and facilitating their school of origin right.

This expense, as described, does not provide a direct educational benefit. This expense would be better suited for reducing a barrier to enrollment or identification.

1. Is up to 15% all a district can put in the grant for a Homeless Liaison salary?

Maybe. The district can assign up to 15% of the grant for miscellaneous costs, which would include liaison salary, office supplies and anything that is allowable but not specified in Section Six of [704 KAR 7:090.](https://apps.legislature.ky.gov/law/kar/titles/704/007/090/) If the liaison is providing direct educational services or reducing barriers for students experiencing homelessness, those percentages of the salary may be assigned to the categories of E or B

1. Is the 15% misc. funds a KDE or DOE rule?

Neither. This rule is part of Section 6 of [704 KAR 7:090.](https://apps.legislature.ky.gov/law/kar/titles/704/007/090/) While the term miscellaneous is not included in the regulation, it is possible that a district may allocate only 35% to reducing barriers and 50% to education, leaving 15% to other allowable costs not defined in the regulation but defined by the McKinney-Vento Act.

1. The RFA mentioned the median range of grant funding was $118,000.00. What is the maximum award a district can ask for?

Districts should request an amount that meets the needs of their students experiencing homelessness. All expenditures also meet reasonable, allocable, necessary, and documented (RAND) requirements established in CFR 200.403, 200.404, and 200.405:

* Reasonable: The proposed goods and services are not excessive in cost and are based on prudent and sound purchasing practices.
* Allocable: The goods and services specifically meet the program’s intent.
* Necessary: The goods and services are essential for carrying out programmatic requirements.
* Documented: The district must be able to readily document the reasonableness, necessity and allocability of the expense through an established allowability procedure, needs assessment, standard purchasing processes or district policy.

1. What is Title I role in supporting the grant?

Federal [Education for Homeless Children and Youths Program Non-regulatory Guidance](https://nam11.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww2.ed.gov%2Fpolicy%2Felsec%2Fleg%2Fessa%2F160240ehcyguidance072716.pdf&data=05%7C02%7Ckderfp%40education.ky.gov%7C4726472b6edf479e926308dc2d7166da%7C9360c11f90e64706ad0025fcdc9e2ed1%7C0%7C0%7C638435212356033641%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=O3BfTqJ6%2F7sLb9p4wAD1ZZwhjhv5yuGG3F%2BFkjb6jdo%3D&reserved=0) (question M-4) describes the types of services an LEA may provide to homeless students with Title I homeless set-aside funds. One of the most important expectations is that Title I coordinators are required to meet with liaisons yearly to plan for the Title I, Part A homeless set-aside funds and regularly meet throughout the year to review the set-aside budget, discuss any emerging needs and ensure funds are being spent timely.

1. For the community partnership, could they serve as a liaison with the school district and other community partners to help find camps for students or support living needs (finding shelter space, etc.)

No. The McKinney-Vento Act requires local liaisons to collaborate with “providers of emergency, transitional, and permanent housing to homeless children and youths, and their families, including public housing agencies, shelter operators, operators of transitional housing facilities, and providers of transitional living programs for homeless youths” [42 U.S.C. § 11434(g)(6)]. Moving this responsibility to a community partner would be an example of supplanting. It may be possible to partner on individual activities or initiatives. The National Center for Homeless Education (NCHE) recommends developing a memorandum of understanding for cost-sharing on page 30 of the [McKinney-Vento Tool Box](https://nche.ed.gov/wp-content/uploads/2018/11/tool_1.pdf).