

THE SECRETARY OF EDUCATION WASHINGTON, DC 20202

April 23, 2021

Dear Chief State School Officers:

I am writing to inform you of the disbursement of funds by the U.S. Department of Education (Department) under section 2001(b)(1) of the American Rescue Plan Act of 2021 (ARP) for the purposes of identifying homeless children and youth, providing wraparound services in light of the impact of the COVID-19 pandemic, and providing assistance needed to enable homeless children and youth to attend school and participate fully in school activities, including in-person instruction this spring and summer learning and enrichment programs that begin in the coming months.¹

The ARP included an unprecedented \$800 million to support the specific and urgent needs of homeless children and youth in recognition of the extraordinary impact of the pandemic on students experiencing homelessness through the ARP Elementary and Secondary School Emergency Relief – Homeless Children and Youth (ARP-HCY) Fund. After reserving \$1 million of the \$800 million (0.125 percent) for national activities including technical assistance, the Department will award the remaining \$799 million to State educational agencies (SEAs) as follows:

- \$199,750,000 (25% of the \$799 million) will be made available to States now. This first disbursement is designed to provide funding to States immediately as a supplement to their McKinney-Vento Education for Homeless Children and Youth (EHCY) funds, so that States can address urgent needs of homeless children and youth—including academic, social, emotional, and mental health needs—and so States and local educational agencies (LEAs) can increase capacity by hiring staff, dedicating resources, and planning partnerships with community-based organizations, among other strategies. Funds must be administered by the Office of the State Coordinator for the Education of Homeless Children and Youth, consistent with the requirements for EHCY funds.
- \$599,250,000 (75% of the \$799 million) will be made available as soon as June after the Department completes necessary regulations to change EHCY's required competitive subgrant process for the purpose of the second allocation of funding. The Department anticipates that the new regulation would require States to distribute funds that they will receive in the second phase to LEAs via a formula that uses the LEA's allocation under Title I, Part A (Title I) of the Elementary and Secondary Education Act of 1965 (ESEA) and the number of identified homeless children and youth in 2018-19.

Attachment 1 lists the total State allocations as well as the allocations for the 25 percent portion (referred to as ARP Homeless I hereafter) and the 75 percent portion (referred to as ARP Homeless II hereafter), described above. These allocations are based on the proportion of funds that each State received under Title I in fiscal year 2020.

The Department's approach will ensure that States and LEAs have resources to provide support to students most in need as quickly as possible. I urge you to begin deploying these vital resources quickly

¹ Other than statutory and regulatory requirements included in the document, the contents of this guidance do not have the force and effect of law and are not meant to bind the public. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

to meet the immediate needs of students experiencing homelessness. According to the Centers for Disease Control and Prevention (CDC), people experiencing homelessness are particularly vulnerable to COVID-19 and may be at increased risk for severe illness.² In a recent survey of district homeless liaisons, staff described many significant, unmet needs of students experiencing homelessness, including lack of internet, shelter/housing, food and, child care.³ Despite the increased needs of students experiencing homelessness, there are widespread reports that schools did not adequately engage students experiencing homelessness during pandemic-related school building closures.⁴ For additional resources that address the needs of students experiencing homelessness, please see the Department's COVID-19 Handbook Volume 1: <u>Strategies for Safely Reopening Elementary and Secondary Schools</u> and Volume 2: <u>Roadmap to Reopening Safely and Meeting All Students' Needs</u>.

This letter is intended to provide additional information and recommendations to support States and LEAs in putting these resources to work to support students experiencing homelessness.

ARP Homeless I: Targeting Immediate Needs

As a result of the COVID-19 pandemic, students experiencing homelessness are increasingly underidentified, as learning outside of school building settings may have impeded the critical role of educators and staff in schools and districts to properly identify students, and these students have remained underserved by schools, districts, and States. New ARP funding to support students experiencing homelessness has tremendous potential to expand the systems in your State to identify and support the needs of homeless children and youth.

For ARP Homeless I, Attachment 2 lists the maximum State reservation amount for State-level activities (up to 25 percent) and the minimum amount of funds that a State must award to LEAs (at least 75 percent). We encourage each State to consider how best to use these resources at the State and LEA levels, in conjunction with the other funds, such as the ARP Elementary and Secondary School Emergency Relief (ARP ESSER) funds, that the Department recently awarded to States.

Funding for State-Level Activities

Following the requirements of the EHCY program, a State may reserve up to 25 percent of its allocation for State-level activities. Accordingly, we urge States to reserve sufficient funding to support training, technical assistance, capacity-building, and engagement at the State and LEA levels. These funds should specifically be used to help LEAs identify and support students experiencing homelessness.

In particular, the Department is concerned that historically underserved populations such as rural children and youth, Tribal children and youth, students of color, children and youth with disabilities, English learners, LGBTQ+ youth, and pregnant, parenting, or caregiving students experiencing homelessness may not have been identified and, as a result, may not be receiving the support and services they need. The Department encourages States to award from funds reserved for State-level activities subgrants or contracts to community-based organizations that are well-positioned to identify such children and youth and connect them to educationally related supports and wraparound services.

In addition, States should focus on providing technical assistance and training to LEAs that have not received an EHCY subgrant in the past to ensure that these LEAs are well-prepared to work in partnership with organizations to utilize the funds from ARP Homeless II. Then, when the second disbursement of

² https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/homelessness.html. See also: https://www.cdc.gov/coronavirus/2019-ncov/community/homeless-shelters/homeless-youth.html.

³ https://schoolhouseconnection.org/lost-in-the-masked-shuffle-and-virtual-void/.

⁴ For the definition of homelessness under the Education of Homeless Children and Youth program, see https://nche.ed.gov/determining-eligibility/.

ARP funds is available, States and LEAs can build on this work to continue identifying and providing timely and effective services to students experiencing homelessness.

We also specifically urge States to use their funds for State-level activities to provide support to LEAs to increase access to summer programming and plan for and provide wraparound services for this summer (summer 2021), in collaboration with State and local agencies and other community-based organizations. It is important to note that the needs of students experiencing homelessness must be addressed through the use of the ARP ESSER funds for State reservations (to address the academic impact of lost instructional time, summer learning and enrichment, and comprehensive afterschool programming) and the required LEA reservation for the academic impact of lost instructional time, and that the funding provided to support the needs of students experiencing homelessness by section 2001(b)(1) of the ARP is in addition to the support and services provided with ARP ESSER funds. (For example, a State may offer a summer learning and enrichment program for students disproportionately impacted by the pandemic, specifically including students experiencing homelessness, using ARP ESSER funds. A State may also use the ARP-HCY funds to complement its existing EHCY program to launch an outreach campaign to support students experiencing homelessness in enrolling in the ARP ESSER summer learning and enrichment program.)

Funding for LEAs

After reserving up to 25 percent of its ARP Homeless I allocation for State-level activities, an SEA must distribute the remaining ARP Homeless I funds (at least 75 percent of the SEA's total allocation) to LEAs following EHCY requirements.

In order to facilitate urgent disbursement and use of these funds, the Department strongly encourages States to use the funds reserved for LEAs primarily to supplement existing EHCY LEA subgrants. This will allow for more rapid fund distribution so that funds can immediately be used by LEAs to bolster their approaches to address the needs of students experiencing homelessness. States should encourage LEAs to use these funds to focus on identifying students *this spring* and to connect students experiencing homelessness and their families to summer learning and enrichment programs this summer (summer 2021), and to engage students and their families in preparation for this fall. The Department further encourages SEAs to analyze where there are significant concentrations of students and families experiencing homelessness across their State (including in LEAs that are not existing EHCY subgrantees), and how they will ensure that supports from ARP Homeless I can reach them.

Similar to our recommendation to SEAs to award subgrants or contracts for help to identify historically underserved populations such as rural children and youth, Tribal children and youth, students of color, children and youth with disabilities, English learners, LGBTQ+ youth, and pregnant, parenting, or caregiving students experiencing homelessness, the Department encourages LEAs with sufficient funds to award contracts to community-based organizations for this purpose, as well as to provide wraparound services to these students.

Uses of Funds

ARP Homeless I funds supplement the EHCY program, and all allowable EHCY uses apply to these funds. For more information, LEAs should reference the list of authorized activities in section 723(d) of the EHCY statute, 42 U.S.C. § 11433(d).

These activities may include any expenses necessary to facilitate the identification, enrollment, retention, and educational success of homeless children and youth, such as:

- providing wraparound services (which could be provided in collaboration with and/or through contracts with community-based organizations, and could include academic supports, traumainformed care, social-emotional support, and mental health services);
- purchasing needed supplies (e.g., PPE, eyeglasses, school supplies, personal care items);
- providing transportation to enable children and youth to attend classes and participate fully in school activities;
- purchasing cell phones or other technological devices for unaccompanied youth to enable the youth to attend and fully participate in school activities;
- providing access to reliable, high-speed internet for students through the purchase of internet-connected devices/equipment, mobile hotspots, wireless service plans, or installation of Community Wi-Fi Hotspots (e.g., at homeless shelters), especially in underserved communities;
- paying for short-term, temporary housing (e.g., a few days in a motel) when such emergency housing is the only reasonable option for COVID-safe temporary housing and when necessary to enable the homeless child or youth to attend school and participate fully in school activities (including summer school); and
- providing store cards/prepaid debit cards to purchase materials necessary for students to participate in school activities.

LEAs must ensure that all costs are reasonable and necessary and that these uses of funds align with the purpose of, and other requirements in, the EHCY statute. In addition, when considering funding decisions, we want to emphasize that section 723(d)(16) of the EHCY statute allows the use of funds for "other extraordinary or emergency assistance needed to enable homeless children and youths to attend school and participate fully in school activities." Accordingly, when considering funding decisions, LEAs should analyze the needs of students experiencing homelessness in light of the COVID-19 pandemic and its extraordinary impact.

This \$800 million ARP-HCY fund will allow us collectively to improve educational opportunities and outcomes for students experiencing homelessness across the Nation, and the Department is eager to partner with you in this effort. The Department is dedicated to supporting States and LEAs in the effective implementation of the ARP funds, and we will release information about technical assistance opportunities over the coming weeks. If you have questions about these funds or would like to request technical assistance, please contact homelessED@ed.gov.

As always, I thank you for all you do for children, youth, and families experiencing homelessness in your communities.

Sincerely,

Miguel A. Cardona, Ed.D.

Secretary

U.S. Department of Education

Attachments

cc: Governors

State Coordinators for the Education of Homeless Children and Youth