Allowable Use of Funds: What is written in the law and guidance for Title I-A Homeless set-aside, EHCY/MV Subgrant, and ARP-HCY funds?

MV - Non-Regulatory Guidance

https://oese.ed.gov/files/2020/07/160240ehcyguidanceupdated082718.pdf

See pages 40-41

M-4. What types of services may an LEA provide to homeless students with funds reserved under section 1113(c)(3)(A) of the ESEA?

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. (ESEA section 1113(c)(3)(C)(ii)). For example, to help homeless students effectively take advantage of educational opportunities, an LEA 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. (ESEA section 1113(c)(3)(A); 2 CFR § 200.403(a)). 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 generally. (*See* ESEA section 1115(e)(2)).

M-10. May Title I, Part A funds reserved under section 1113(c)(3)(A) of the ESEA be used to fund the local liaison position?

Yes. Title I, Part A homeless set-aside funds may be used to fund all or part of the homeless liaison's salary even if that person has no Title I duties. (ESEA section 1113(c)(3)(C)(ii)(II)). In larger districts with significant numbers of identified homeless students enrolled, an LEA may also use Title I funds to support, as necessary, additional staff carrying out the required duties of the local liaison.

See pages 20-22

H-1. For what activities may an LEA use EHCY/McKinney-Vento subgrant funds?

LEAs must use McKinney-Vento funds to assist homeless children and youth in enrolling, attending, and succeeding in school. In particular, the funds may support the following activities:

(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.

(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 or similar State or local programs, programs in career and technical education, and school nutrition programs).

(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 subtitle, and the specific educational needs of runaway and homeless youths.

(4) The provision of referral services to homeless children and youths for medical, dental, mental, and other health services.

(5) The provision of assistance to defray the excess cost of transportation for students under section 722(g)(4)(A), not otherwise provided through Federal, State, or local funding, where necessary to enable students to attend the school selected under section 722(g)(3).

(6) The provision of developmentally appropriate early childhood education programs, not otherwise provided through Federal, State, or local funding, for preschool-aged homeless children.

(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 nonhomeless children and youths.

(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.

(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.

(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 and youths in the education of such children and youths.

(11) The development of coordination between schools and agencies providing services to homeless children and youths, as described in section 722(g)(5).

(12) The provision of specialized instructional support services (including violence prevention counseling) and referrals for such services.

(13) Activities to address the particular needs of homeless children and youths that may arise from domestic violence and parental mental health or substance abuse problems.

(14) The adaptation of space and purchase of supplies for any nonschool facilities made available under subsection (a)(2) to provide services under this subsection.

(15) The provision of school supplies, including those supplies to be distributed at shelters or temporary housing facilities, or other appropriate locations.

(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.

Excerpt from Secretary Cardona letter to Chief State School Officers
https://oese.ed.gov/files/2021/04/ARP-Homeless-DCL-4.23.pdf

ARP-HCY Funding for LEAs

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/MV subgrant 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 support, trauma-informed 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.