

COVID-19 and Homelessness: Information for Schools

While COVID-19 disrupts education, services and life across the country, children and youth experiencing homelessness remain exceptionally vulnerable. Even as education programs and services are modified and adapted in this COVID environment, schools must continue to address the needs of students experiencing homelessness. The following “Questions and Answers” provide some important information for education leaders to consider as LEAs review the current and ongoing needs of children and youth experiencing homelessness throughout the COVID-19 crisis.

Are LEAs allowed to waive requirements of the federal McKinney-Vento Act during the COVID pandemic?

No. The McKinney-Vento Act is still fully in effect. The way in which the law is implemented must change, of course, but the law is in effect. It is more important than ever that LEAs continue with identification efforts since many new families and youth may fall into homelessness due to the economic crisis, with many urgent needs. Due to their extensive statutory responsibilities under federal law, McKinney-Vento liaisons should be considered essential personnel and responsible for ensuring identification, enrollment, and connection to services for homeless students. Schools must enroll McKinney-Vento students immediately, even during this pandemic. 42 USC 11432(g)(3)(C). Enrollment means “attending classes and participating fully in school activities.” 42 USC 11434a(1). That means students experiencing homelessness need to be enrolled immediately, so they can participate immediately in any and all activities the school is offering at this time—school meals, virtual classes, social work services outreach, etc. Review Commissioner Cardona’s memorandum [Attendance Guidance and Ensuring Student Engagement during School Class Cancellations Due to COVID-19](#).

Should “best interest” determinations be conducted when in-school classes are cancelled and schools are offering virtual instruction or optional virtual learning?

Yes. The McKinney-Vento Act includes the right to enroll immediately “in any public school that nonhomeless students who live in the attendance area in which the child or youth is actually living are eligible to attend” or remain in their school of origin, according to the student’s best interest. In determining a student’s best interest, the impact of school closures and limited personnel certainly should be considered. Changing schools at this time may increase the likelihood of the student falling behind academically or missing out on services. However, there may be important reasons to change to a local school, e.g. better access to school meals or other supports and services.

What are some basic strategies an LEA should consider that are targeted at the ongoing needs of children and youth experiencing homelessness throughout the COVID-19 crisis?

1. Enhance identification efforts during school closures and modified points-of-contact with schools. Outreach about McKinney-Vento eligibility and services on all available platforms, ensure online

enrollment processes ask about housing circumstances and engage with community providers to people experiencing homelessness.

2. Ensure students are able to participate fully in all school activities by considering how homelessness increases their mobility and may include transportation or other challenges. This may include providing them access to devices and internet connectivity, but also consider emergency assistance such as gas vouchers or bus passes to pick up meals and schoolwork or drop off completed assignments. Delivery options of meals and assignments to where students are staying may be considered.
3. Connect with students who were struggling with housing prior to COVID-19 and maintain communication by ensuring homeless families and youth have a way to stay in touch with the liaison, teachers, counselors, and others. This may include pre-paid cell phones or other tools to keep connected despite frequent moves and school closures. Communicate often with students, families and with community service providers, e.g. shelter and housing agencies, to ensure students are connected and engaged in school.
4. Re-evaluate the role of the current LEA McKinney-Vento liaison. Ensure they have capacity and resources to do their jobs effectively, fulfill their duties as outlined in the law and sufficiently address the ongoing needs of children and youth experiencing homelessness throughout the COVID-19 crisis?

What resources are available to assist LEAs with addressing the needs of children and youth experiencing homelessness throughout the COVID-19 crisis?

The recent CARES Act created the Elementary and Secondary School Emergency Relief (ESSEA) fund, of which a specific allowable use of funding is "activities to address the unique needs of students experiencing homelessness, including how outreach and service delivery will meet their needs." In planning the use of ESSEA funds, LEAs will need to consult with various stakeholders at the local level to ensure that the most at-risk students' needs are met including students with disabilities, English learners, foster children, McKinney-Vento (homeless) eligible children, free/reduced-priced meal eligible children, and students who are racial and/or ethnic minorities.

Both the McKinney-Vento and Title I, Part A funds may provide LEAs with an already existing funding stream that can be used to target additional supports and services that benefit homeless students. With either funds, two principles should be considered when LEAs are exploring use of these funds to provide services to homeless students:

1. Services must be reasonable and necessary to assist homeless students to take advantage of educational opportunities.
2. 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 used to provide similar services for economically disadvantaged students generally.

What are allowable expenses or activities for CARES ESSER funds grants?

- Any activity authorized by the ESEA of 1965, including the Native Hawaiian Education Act and the Alaska Native Educational Equity, Support, and Assistance Act ([20 U.S.C. 6301](#) et seq.), the Individuals with Disabilities Education Act ([20 U.S.C. 1400](#) et seq.) ("IDEA"), the Adult Education and Family Literacy Act ([20 U.S.C. 1400](#) et seq.), the Carl D. Perkins Career and Technical Education Act of 2006 ([20 U.S.C. 2301](#) et seq.) ("the Perkins Act"), or subtitle B of title VII of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11431](#) et seq.).

- Coordination of preparedness and response efforts of local educational agencies with State, local, Tribal, and territorial public health departments, and other relevant agencies, to improve coordinated responses among such entities to prevent, prepare for, and respond to coronavirus.
- Providing principals and others school leaders with the resources necessary to address the needs of their individual schools.
- Activities to address the unique needs of low-income children or students, children with disabilities, English learners, racial and ethnic minorities, students experiencing homelessness, and foster care youth, including how outreach and service delivery will meet the needs of each population.
- Developing and implementing procedures and systems to improve the preparedness and response efforts of local educational agencies.
- Training and professional development for staff of the local educational agency on sanitation and minimizing the spread of infectious diseases.
- Purchasing supplies to sanitize and clean the facilities of a local educational agency, including buildings operated by such agency.
- Planning for and coordinating during long-term closures, including for how to provide meals to eligible students, how to provide technology for online learning to all students, how to provide guidance for carrying out requirements under the Individuals with Disabilities Education Act ([20 U.S.C. 1401](#) et seq.) and how to ensure other educational services can continue to be provided consistent with all Federal, State, and local requirements.
- Purchasing educational technology (including hardware, software, and connectivity) for students who are served by the local educational agency that aids in regular and substantive educational interaction between students and their classroom instructors, including low-income students and students with disabilities, which may include assistive technology or adaptive equipment.
- Providing mental health services and supports.
- Planning and implementing activities related to summer learning and supplemental afterschool programs, including providing classroom instruction or online learning during the summer months and addressing the needs of low-income students, students with disabilities, English learners, migrant students, students experiencing homelessness, and children in foster care.
- Other activities that are necessary to maintain the operation of and continuity of services in local educational agencies and continuing to employ existing staff of the local educational agency.