

August 18, 2023

The Honorable Miguel Cardona
Secretary of Education
United States Department of Education
400 Maryland Avenue, S.W.
Washington, D.C. 20202

Dear Secretary Cardona:

As organizations committed to educational equity, we urge you to quickly release updated guidance to rightfully clarify the flexible use of American Rescue Plan Homeless Children and Youth (ARP-HCY) funds to support the school identification, enrollment, and participation of children and youth experiencing homelessness.

Driven by the lingering impact of the COVID-19 pandemic, an affordable housing crisis, addiction crisis, mental health crisis, and immigration crisis, homelessness is at record levels in many communities. Public schools reported nearly a 10% increase in the number of identified students experiencing homelessness in the 2021-2022 school year, and local and state education agencies indicate that an even greater increase will be reported for the 2022-2023 school year.¹ These students have higher chronic absence rates, drop-out rates, and suspension and expulsion rates than other economically disadvantaged students.² In addition, according to recent Centers for Disease Control data, they are more likely to experience violence and attempt suicide.³ Students who experience homelessness are disproportionately students of color, pregnant and parenting, and LGBTQ+; they are also disproportionately students with disabilities and English Learners.⁴ In sum, students experiencing homelessness are among the most underserved students in our nation, and face numerous hurdles to obtaining the education that is necessary for a more secure future.

Recognizing this tremendous need, ARP-HCY funds offer an historic opportunity to identify and re-engage students experiencing homelessness, and support their academic recovery and progress. Yet state and local education homeless coordinators report numerous barriers to the effective use of ARP-HCY funds, including restrictions and lack of clarity on allowable uses of funds. These unnecessary barriers are leaving students without needed services and ARP dollars are very likely to be unspent. With just over one year remaining before funds must be obligated, urgent action is needed. Therefore, we request that ED quickly issue guidance that:

- Permits ARP-HCY funds to pay for up to two weeks in a motel when emergency housing is the only reasonable option to enable children and youth experiencing homelessness to attend school (including in their school of origin) and participate fully in school

¹ Source: <https://eddataexpress.ed.gov/dashboard/homeless/2021-2022?s=1035&sy=2919>

² Source: <https://schoolhouseconnection.org/data-profiles/>

³ Source: https://www.cdc.gov/mmwr/volumes/72/su/su7201a4.htm?s_cid=su7201a4_w

⁴ Source: <https://schoolhouseconnection.org/data-profiles/>

activities (including summer school). The shortage of shelter beds for families and youth is especially acute in rural and suburban areas, as well as urban areas with large arrivals of immigrant families. Families and youth who do not know where they will sleep at night struggle to attend school on a regular basis. School district homeless liaisons report that while paying for short-term motel stays promotes school attendance, the 2-3 nights that ED currently permits is not enough time to stabilize families and arrange for longer-term housing. Indeed, it may take 2-3 days simply to receive a returned phone call from community housing partners, much less find an available housing option for a family or youth. Moreover, absent sufficient time to stabilize, by the time transportation to school has been arranged, the family or youth may have moved on and become lost to the school system. These families and youth have suffered extreme trauma, and often need a few days of rest before they can contemplate housing options. Finally, caseloads are very high; one large urban school district reported a 25% increase in the number of McKinney-Vento students identified on the first day of this school year this year, compared to last year. As a result of large caseloads, it may take a few days for liaisons to be able to meet families to assist with intake and housing referrals. For all of these reasons, we believe that allowing ARP-HCY funds to pay for motel stays for up to two weeks is necessary and will improve the enrollment, attendance, and success of these students. This use is also a priority for school districts looking to make the most effective use of these funds. Most importantly, it is fully within the parameters of the ARP legislation and should not be unnecessarily restricted by USED.

- Prohibits States from restricting or limiting the local use of ARP-HCY funds. ED's guidance on ARP ESSER funds makes clear that neither an SEA nor a state legislature may limit the local use of ARP ESSER funds. The same principles should apply to ARP-HCY funds, to ensure that the funds meet the urgent locally-identified needs of children and youth experiencing homelessness. Again, nothing in the ARP legislation gives SEAs additional rights to restrict the use of ARP-HCY funds.
- Affirms the allowable use of store cards and pre-paid debit cards to purchase materials necessary for students to participate fully in school activities, and provides guidance that any LEAs that chooses to use ARP-HCY funds for store cards should employ tracking methods to ensure effective use and program integrity. School district liaisons report that store cards and pre-paid debit cards are an efficient way to remove barriers caused by lack of clothing, shoes, gas, and other items necessary for regular school attendance. Moreover, store cards are an important way to develop relationships built on trust and on dignity. As such, store cards not only remove barriers, they help re-engage families who have been isolated and who have lost trust in school systems post-pandemic. Yet ED's guidance appears to reinforce pre-conceived notions that use of ARP-HCY on store cards will result in fraud, waste, and abuse, thus limiting this option, rather than proactively addressing the concerns with appropriate guidance for tracking such use of funds.

In addition to updated guidance, we also urge ED to respond expeditiously to questions from state and local educational agencies on use of ARP-HCY funds, and to share out publicly, on a regular basis, answers that have been provided. Slow responses from ED have hindered

effective use of ARP-HCY funds, and both state and local educational agencies would benefit from hearing answers to questions that their peers have asked.

We welcome the opportunity to meet with you to discuss these concerns or any answer questions. Thank you for your leadership on behalf of these resilient students and families, for whom school must be a place of stability, opportunity, and hope.

Sincerely,

AASA, The School Superintendents Association
All4Ed
American Psychological Association Services
Association of School Business Officials International (ASBO)
Chiefs for Change
Coalition for Community Schools
Council of Administrators of Special Education
Covenant House International
EDGE Consulting Partners
Education Reform Now
The Education Trust
Homeless Children's Education Fund
Institute for Educational Leadership
Learning Disabilities Association of America
Learning Policy Institute
National Center for Learning Disabilities
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