



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

September 12, 2023

Dear Chief State School Officers:

Thank you for your continued work to invest dedicated funding under section 2001(b)(1) of the American Rescue Plan Act of 2021 for the purposes of serving homeless children and youth (ARP-HCY). These funds, which must be obligated by September 30, 2024, can provide critical wraparound supports for students experiencing homelessness who have been especially impacted by the COVID-19 pandemic. I am writing today to share recommendations for maximizing the use of these resources to help students experiencing homelessness and improve outcomes to levels that meet or exceed pre-pandemic achievement.¹

Homelessness among children and youth is prevalent across rural, suburban, and urban communities. Public schools enrolled more than 1.2 million children and youth experiencing homelessness in the 2021-2022 school year, an increase of almost 10 percent over the previous year.² Of these students, 20 percent were children with disabilities, and 18 percent were English learners. In addition, there were 1.2 million children under the age of six who experienced homelessness in 2018-2019, which is the most recent data available.³ Students experiencing homelessness have high rates of chronic absenteeism and graduate from high school at lower rates than other students, including economically disadvantaged students.⁴ Recent data from the Centers for Disease Control and Prevention show that students experiencing homelessness report being more likely to experience violence, report depression, and attempt suicide, as well as other serious health risks.⁵ For many schools and local educational agencies (LEAs), difficulties in identifying students who experience homelessness mean that critical programs and services do not reach the young people who need them.

Given the pressing needs of students experiencing homelessness, and with just 12 months remaining to obligate ARP-HCY funds, please evaluate whether modifying State and/or local administrative processes, such as budget amendment and procurement processes, might expedite the deployment of these resources. I also encourage you to consider additional collaborative efforts, such as contracting with community-based organizations (CBOs) that are well-positioned to identify children and youth experiencing homelessness in historically underserved communities and to connect them to services. State educational agencies (SEAs) and LEAs should also consider offering additional professional development opportunities to school staff, other agency staff, and community organizations that provide services to students and families experiencing homelessness.

¹ This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies, and except for the cited statutory and regulatory requirements, the contents of this letter do not have the force and effect of law.

² <https://eddataexpress.ed.gov/>.

³ <https://www2.ed.gov/rschstat/eval/disadv/homeless/early-childhood-homelessness-state-profiles-2021.pdf>.

⁴ <https://nche.ed.gov/wp-content/uploads/2022/11/Homeless-Student-Absenteeism-in-America-2022.pdf>.

⁵ https://www.cdc.gov/mmwr/volumes/72/su/su7201a4.htm?s_cid=su7201a4_w.

As a reminder, any activity allowable under the McKinney-Vento Education for Homeless Children and Youth (EHCY) program in section 723(d) of the McKinney-Vento Homeless Assistance Act is also allowable under the ARP-HCY program. Allowable activities include paying expenses necessary to facilitate the identification, enrollment, retention, and educational success of children and youth experiencing homelessness, as well as providing expedited evaluations of their strengths and needs to determine eligibility under Section 504 of the Rehabilitation Act and the Individuals with Disabilities Education Act.

In addition to guidance, issue briefs, and other resources already provided on the [Department's](#) and the [National Center for Homeless Education's](#) (NCHE) websites, I want to highlight other allowable activities that some SEAs and LEAs around the country are supporting with ARP-HCY funds. While this is not an exhaustive list of activities and each use is always context-specific to determine whether it is reasonable and necessary in each LEA, these areas may be especially important for accelerating opportunities and outcomes for students experiencing homelessness during the new school year.

To improve attendance and reduce chronic absenteeism, consider...

- Hiring or retaining staff or contracting with CBOs that can help families effectively navigate housing and other support systems.
- Providing transportation to and from the school of origin or when necessary to enable children and youth experiencing homelessness to attend classes and participate fully in school activities. This may include the purchase of vehicles by LEAs for the specialized transportation of homeless children and youth, as well as reimbursing parents and youth for gas costs, purchasing prepaid gas cards, and paying for limited car repairs if such costs are reasonable and necessary. When evaluating costs, LEAs should consider if the proposed uses are cost effective compared to other modes of transportation, such as rerouting school buses or hiring vehicles and drivers from private companies. LEAs that allow the use of prepaid gas cards should implement strong internal controls to ensure funds are used for school of origin transportation.
- Expanding access to reliable, high-speed internet for students through the purchase of internet-connected devices or equipment, mobile hotspots, wireless service plans, or installation of community wireless hotspots to help students stay connected to schoolwork including at shelters, transitional housing, and other sites.⁶
- Implementing high-quality transition strategies to reduce absences and dropouts. Such strategies may include sharing information about a student's next school, hiring mentors who can partner with students and their families to encourage regular school attendance and connect students at risk of chronic absenteeism with additional supports,⁷ and engaging students in targeted academic programs such as summer bridge programs or transition year academies.⁸
- Purchasing store cards/prepaid debit cards that students or families can use to purchase materials necessary for a student experiencing homelessness to participate fully in school activities. Any SEA or LEA using funds in this way should implement strong internal

⁶ https://tech.ed.gov/files/2022/09/DEER-Resource-Guide_FINAL.pdf.

⁷ [In School Every Day: Addressing Chronic Absenteeism Among Students Experiencing Homelessness \(ed.gov\)](#).

⁸ <https://ies.ed.gov/ncee/pubs/2021004/pdf/2021004.pdf>.

controls such as collecting receipts for items purchased with prepaid debit and store cards, employing tracking methods (e.g., creating online forms for parents or youth to affirm the use of the card), and requiring parents or youth to sign for cards when received.

- Paying for short-term, temporary housing (including a hotel or motel) on a case-by-case basis.⁹ While the timeframe for short-term housing is fact-specific and based on individual circumstances, the Department recognizes that housing transitions can be complex and take time. A relevant consideration regarding “short-term” might include ensuring a student can complete a week of school before a housing change. LEAs and SEAs should consider whether the cost is reasonable and necessary for the student to attend school (including in their school of origin), with the understanding that ARP-HCY funds should be used as a last resort when other funding sources are not available through collaboration and coordination with local housing providers, local government agencies, or nonprofits that support families and youth experiencing homelessness.

To address physical and mental health needs, consider...

- Providing food assistance if it is reasonable and necessary to assist homeless students to take advantage of educational and extracurricular opportunities when food is not available to the student through other sources (e.g., free school meals).
- Providing or coordinating wraparound services, which could be provided in collaboration with full-service community schools partners or through contracts with CBOs, and could include academic supports, trauma-informed care, social-emotional support, and mental health services.
- Training and collaborating with school social workers and counselors to better identify students experiencing homelessness, connect them to wraparound services, and provide additional counseling and other behavioral and mental health supports as needed.¹⁰

To strengthen early childhood education, support college and career readiness, and smooth transitions to higher education, consider...

- Providing early childhood education to young children age birth to five who are not formally enrolled in the LEA but who are experiencing homelessness in the LEA.
- Assisting youth and their parents/guardians with completion of the Free Application for Federal Student Aid (FAFSA®) and other college readiness and college access activities, adding staff hours to provide such assistance, and providing transportation so that homeless youth may participate in these activities.
- Paying for college application expenses such as registration fees, preparation materials, entrance and placement exams, and other fees associated with college applications.

⁹ The ARP-HCY statute provides additional emergency funding to SEAs and LEAs to enable homeless children and youth to attend and fully participate in school and to provide these children and youth with wraparound services given the COVID-19 pandemic. As an emergency program, the Department has determined that using ARP-HCY funds for short-term emergency housing is consistent with the purpose of the ARP-HCY statute and could be allowable as a wraparound service made necessary by circumstances precipitated by or related to the COVID-19 emergency, provided the cost of the housing is reasonable and necessary and all other requirements are met. This use of funds would not, however, be allowable under the regular EHCY program.

¹⁰ Please refer to two NCHE reports on these collaborations at <https://nche.ed.gov/wp-content/uploads/2023/04/SSW.pdf> and <https://nche.ed.gov/counselor-support/>.

- Hiring graduation coaches or paying stipends to counselors to conduct transcript audits to help award partial credits and ensure students are on track for graduation.
- Covering any additional fees to participate in early college/dual enrollment programs or career and technical education programs.

NCHE has developed a [tip sheet](#) for SEAs and LEAs on determining whether a proposed use of funds for ARP-HCY grants may be allowable. Because determinations about what expenses are reasonable and necessary are fact-specific, please review the decision points that are detailed in this tip sheet for guidance in making these determinations.

Finally, please take a moment this week to share this letter with your subgrantees, remind them of the critical need to invest these resources now to support especially vulnerable students and young people, and urge them to examine whether adjustments to local policies and procedures might allow ARP-HCY funds to have further impact. As always, if there is anything the Department can do to support you or your subgrantees in maximizing use of these funds, please contact us at homelessED@ed.gov.

Sincerely,

/s/

Adam Schott
Deputy Assistant Secretary for Policy and Programs
Delegated the Authority to Perform the Functions
and Duties of the Assistant Secretary
Office of Elementary and Secondary Education

cc: State Coordinators for the Education of Homeless Children and Youth