

Questions & Answers

COVID-19 Guidance Regarding Children and Youth Experiencing Homelessness

At this particularly challenging time, Tennessee's homeless students are among the most vulnerable and need our best efforts and dedicated commitment to support their needs. The McKinney-Vento Homeless Children and Youth Program ensures all homeless children and youth, including preschoolers, have equal access to the same free and appropriate public education as non-homeless children and youth.

This document has been provided in response to the rapidly changing needs of Tennessee LEAs, schools, and students due to COVID-19 related school closures. The Tennessee Department of Education (department) used guidance from the U.S. Department of Education (ED) to develop this resource, and we expect it will evolve and be updated as necessary.

1. Are we required to follow the McKinney-Vento Act during the COVID-19 crisis?

Yes. The McKinney-Vento Act is still fully in effect. All districts must support the educational stability of homeless students per the federal McKinney-Vento law and as outlined in Tennessee's Every Student Succeeds Act (ESSA) plan. Below are recommendations for LEAs:

- Consider increasing the amount of the Title I, Part A funds set aside for supporting homeless students during the time schools are closed. Districts must set aside a portion of Title I, Part A funds to be used explicitly to support homeless students. Given the level of need of homeless students during school closures, districts are encouraged to exercise discretion to increase the amount of the Title I, Part A funds set aside for homeless students. Districts may submit budget revisions to their current funding application to address additional flexibilities in spending. For more information on the allowable uses of the Title I, Part A homeless set-aside, see question 11 below.
- Support the activities of homeless liaisons to provide additional assistance to homeless students and their families. Every district in the state is required to have a homeless liaison, whose duties include identifying homeless students, educating the public on homeless rights and services, and connecting families with services. The homeless liaison can coordinate services for homeless students during this time, including food, shelter and health services. A main function of the liaison is to identify homeless students—as an influx of housing instability is expected during this time, the homeless liaison will be a critical resource in tracking and connecting with homeless families during and after the school-building closures. For more information on identifying students experiencing homelessness, see question 3 below.
- Provide information about homeless services and contact information for the district's homeless liaison at meal distribution sites. Meal sites will be points of access for families and students. Districts can improve awareness of and access to services for homeless students by providing important service information at these sites. Tennessee will not need a waiver or expressed flexibility from the U.S. Department of Education to complete this recommendation. For more information about school meal sites in Tennessee, click [here](#).

2. What should we consider as we determine how to best provide services to students experiencing homelessness?

District and school leaders should consider the following three questions as they think through how

best to provide services to homeless students. These considerations are designed to drive practical approaches that are sensitive to ensuring the health and safety of students, educators, and the community:

- Is the activity essential?
- Can the activity be done virtually?
- If there is no other choice, can the activity be done safely? This means individuals are separated by distance, not congregating in close proximity, and the health of participants (students, educators, and others) is protected.

Consulting the local health department when making such decisions is advisable and encouraged.

3. *Are we required or able to make McKinney-Vento eligibility determinations during this time? We have received a few requests.*

Yes. The McKinney-Vento Act is still fully in effect, and it is crucial that identification efforts continue because it is expected that many new families and youth will fall into homelessness due to the economic crisis. *Additionally, it is possible that future supplemental funding may be based on the number of homeless students identified. Therefore, identifying newly homeless students is imperative during this time.*

4. *How do we enroll students when school is closed? We will be able to contact our existing students/families, but with schools no longer enrolling new students, how are we supposed to assist students that are now losing housing and coming from other counties or other states?*

The COVID-19 pandemic does not change the mandate that schools must enroll McKinney-Vento students immediately [42 USC 11432(g)(3)(C)]. Enrollment means “attending classes and participating fully in school activities” [42 USC 11434a(1)]. If the school is offering no services or activities whatsoever to any students at this time, then students experiencing homelessness would also not receive services at this time. In that context, enrollment may mean simply entering the student into the school database, with a flag or other identification as McKinney-Vento eligible. However, most schools are offering meals and some form of virtual instruction or optional virtual learning. That means students experiencing homelessness need to be enrolled immediately so that they can participate immediately in all activities the school is offering at this time—school meals, virtual classes, social work services outreach, etc.

If there is no distance learning in the LEA, the school/LEA still should complete the identification process and code the students as McKinney-Vento in their data system.

5. *Who is responsible for communicating with students and families experiencing homelessness about services supports?*

Students identified as experiencing homelessness should receive information and services from the LEA’s homeless liaison as it relates to COVID-19 and school closures. Proactively, liaisons should contact students and their families to ensure they are connected to school instruction and other schools and/or community-based supports, as needed and appropriate. Homeless liaisons may act as service coordinators for families experiencing homelessness.

6. *What methods can LEA and school staff members use to maintain communication with students experiencing homelessness during COVID-19 closures?*

Schools and communities should work together to identify and execute a coordinated community strategy to maintain communication with families and unaccompanied youth experiencing homelessness, such as through prepaid cellphones, email, posting notices at homeless shelters/campgrounds/hotels, or other alternatives. School staff, particularly those who already have

established positive and supportive relationships with students, should be encouraged to regularly check in with the students and their families.

7. *How can families and unaccompanied youth experiencing homelessness access needed support—such as food, hygiene, medical care, temporary shelter, and housing options for quarantine or recovery should they become ill—including in communities where schools have closed in response to COVID-19?*

Communities may opt to keep individual schools or community sites open for food, hygiene, and health care, or provide drive-by options. This approach will allow families who have transportation to access this assistance; however, families and unaccompanied youth who do not have reliable transportation may miss out on these services. Schools and community entities should consider strategies that will allow these families and youth to access the same supports, whether through the provision of transportation assistance, “home” delivery, or other appropriate options. Processes for providing school meals and other services should be modified to ensure that unaccompanied youth can access meals and services, consistent with applicable McKinney-Vento Act requirements. Schools should work with local public health officials and community partners to identify temporary, safe, and stable shelter options for families or youth experiencing homelessness who must quarantine.

Homeless liaisons may act as service coordinators for families experiencing homelessness. The following are examples of service coordination activities they can provide for their students:

- Coordinate for a local fire station to be a hub of resources for families.
- Coordinate for a family to pick up necessary hygiene and cleaning supplies at a meal distribution site.
- Coordinate with shelter providers and create a communication plan to serve students during and after school closures, including distribution of hygiene and cleaning products.

8. *How can schools and communities work together to ensure access to virtual or distance learning opportunities for students experiencing homelessness when schools close?*

Students experiencing homelessness may lack access to technology—including the internet, a computer, and/or an appropriate mobile device—that would allow them to participate fully in online learning. To eliminate this barrier to full participation in school, schools and communities should work together to provide students experiencing homelessness with access to mobile hotspots, laptops/tablets, and any other materials necessary to participate fully in online learning, and also to establish and implement a sensitive and discreet protocol for asking students and their families about their possible lack of supplies or other barriers to online learning.

9. *Can we use McKinney-Vento funds, or Title I, Part A homeless set-aside funds, to pay for internet connections for students experiencing homelessness?*

Yes. With schools closed and students engaged in distance learning (whether optional or required), internet connectivity is essential. In terms of McKinney-Vento funds, internet connectivity in the current circumstances falls under two allowable uses of funds in 42 USC 11433(d):

“(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 non-homeless children and youths.”

and

“(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."

In terms of Title I, Part A set-aside funds, the internet connection falls well within the U.S. Department of Education's [guidance](#):

"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."

Internet connectivity is critical for students to take advantage of educational opportunities at this time. If a company or organization in your area is offering free internet and your homeless students can access that service, then you should not use Title I, Part A funds to pay for the internet. However, often, students will need to pay a connection fee or some monthly fee for the internet. Title I, Part A funds may be used in this instance if no other resources are reasonably available.

10. My district has a McKinney-Vento subgrant. How can these funds be utilized to support students experiencing homelessness?

Tennessee has funding from the U.S. Department of Education to award to subgrantees across the state to provide services and resources to homeless students. Tennessee has 24 subgrantees with awards ranging from \$25,000 to \$400,000. Allowable uses of subgrantee funds are extensive, and subgrantees can increase their support and use funds for the following:

- tutoring, supplemental instruction and other educational services that help homeless children and youths reach Tennessee's Academic Standards;
- referrals of eligible students to medical, dental, mental and other health services;
- education and training for parents and guardians of homeless children and youths about the rights of and resources available to them and other activities designed to increase their meaningful involvement in the educational process;
- coordination between schools and agencies providing services to homeless children and youths to expand and enhance such services;
- providing supplies to non-school facilities serving eligible students and adapting these facilities to enable them to provide services; and
- providing school supplies, including those to be distributed at shelters, temporary housing facilities or other appropriate locations.

11. What support can be provided to students experiencing homelessness with Title I, Part A funds?

[Existing guidance](#) on allowable uses of **Title I, Part A homeless set-asides** (section M-4) is stated below. Note that funds from the Title I, Part A homeless set-aside may also be used for students experiencing homelessness in non-Title I schools.

"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)).”

12. Can Title I, Part A funds be used to purchase gift cards for food?

At this time, existing guidance on uses of Title I, Part A funds for food remains in effect. Existing guidance on allowable uses of **Title I, Part A homeless set-asides** is stated above. Note that food is specifically listed as an allowable use of the set-aside. At the same time, other available food resources, such as free school meals through the USDA Food and Nutrition Service, must be accessed as a first option.

Even if the LEA has rules against gift cards, the McKinney-Vento Act specifically allows for, “(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.” 42 USC 11433(d)(16). The purpose of the Act is to override LEA procedures to accommodate the unique needs of homeless students. The Act requires states and LEAs to “review and revise, policies to remove barriers to the identification of homeless children and youths, and the enrollment and retention of homeless children and youths in schools in the State.” 42USC 11432(g)(1)(I). Therefore, if a prohibition on gift cards is a barrier to

enrollment (which includes “participating fully in school activities”) or retention in school, that policy must be revised.

13. *Can families still be reimbursed for mileage while school is out?*

Yes, families may be reimbursed for mileage if traveling to and from their temporary housing to pick up educational materials, or other supplies being offered by the LEA or school for continued education needs. However, reimbursement to and from their temporary housing to pick up school meals is not an allowable use of McKinney-Vento funds.

14. *What support is available for students experiencing homelessness who attend a non-public or private school?*

If a student who attends a Title I participating non-public school is homeless, then he or she would automatically qualify for whatever Title I services are already occurring at the non-public school (i.e., tutoring, equipment, etc.).

15. *Where can I find more information?*

[The National Center for Homeless Education](#) and [SchoolHouse Connection](#) both have informative COVID-19 information pages. Resources are also available from the [United States Interagency Council on Homelessness](#). Additionally, Tennessee-specific information regarding COVID-19 can be found [here](#). Information about the McKinney-Vento Act, including guidance on the allowable use of McKinney-Vento funds, can be found [here](#).

16. *Who can I reach out to if I have any questions, concerns, or need more guidance?*

Please contact **Vanessa Waters**, McKinney-Vento and family engagement coordinator at Vanessa.Waters@tn.gov.