

## Guidance for Montana Programs Receiving ARP-EHCY I Funds

The following guidance has been prepared by the Montana Office of Public Instruction's (OPI) Education of Homeless Children and Youth (EHCY) Program to assist districts in applying for and operating an ARP-EHCY I funded homeless program. These funds were granted out to districts who received a regularly funded McKinney-Vento subgrant during the 2020-2021 school year. Allocations were based on the number of students identified as homeless during the Spring Testing Window Data Collection in April of 2021. ARP-EHCY I funds are intended to provide services and supports during the 2021 summer to eligible children and youth who have been impacted by the Covid-19 pandemic. Districts should focus on services and programs that will be implemented prior to the start of the 2021-2022 school year with a focus on mitigating learning loss and the social-emotional impacts of the lockdown and school closures. Recipients of this grant may elect to extend the use of ARP-EHCY I funds to surrounding districts through the development of a consortium.

In particular, the OPI and the Department of Education (USED) are concerned that 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 may not have been identified and, as a result, may not be receiving the support and services they need. The USED 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.

Community-based organizations may include tribal governmental agencies such as Departments of Education, non-profits, agencies providing services through 21<sup>st</sup> Century programs, faith-based organizations, or other groups and agencies in the local community as appropriate. Contracted agencies **MUST** agree to provide services to any student or family without regard to tribal affiliation, race, gender, religion, or sexual orientation. The OPI strongly encourages districts to partner/collaborate with local programs funded through the [Youth Homelessness Demonstration Program Grant](#) (YHDP). YHDP programs provide outreach, support, and wrap-around services to youth experiencing homelessness in many communities across Montana.

ARP Homeless I funds are to be used to **supplement** the EHCY program and cannot **supplant** other federal funding sources being used to provide services to other students. Districts may not use ARP-EHCY I funds to purchase items (computers, hot spots, school supplies, PPE, etc.) if the same items are provided to non-homeless students using local, state, or other federal funds. Similarly, districts cannot provide services (summer school, tutoring, credit recovery, social-emotional supports, etc.) if the same services are provided to non-homeless students using local, state, or other federal funds. ARP-EHCY I funds must be used to provide **additional** services to students experiencing homelessness to allow them to have **equitable** access to the services and programs being offered to non-homeless students using local, state, or federal funds including programs funded by ESSER, CARES, or GEER funding.

All allowable EHCY uses apply to these funds. The list of authorized activities in section 723(d) of the EHCY statute, 42 U.S.C. § 11433(d) is included below for reference.

### (d) Authorized activities

A local educational agency may use funds awarded under this section for activities that carry out the purpose of this part, including the following:

- 1) 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) 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 [20 U.S.C. 6301 et seq.] 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 part, and the specific educational needs of runaway and homeless youths,
- 4) Referral services to homeless children and youths for medical, dental, mental, and other health services,
- 5) Assistance to defray the excess cost of transportation for students under section 11432(g)(4)(A) of this title, not otherwise provided through Federal, State, or local funding, where necessary to enable students to attend school,
- 6) Developmentally appropriate early childhood education programs, not otherwise provided through Federal, State, or local funding, for preschool-aged homeless children,
- 7) 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,
- 8) 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) 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) 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 or youths in the education of such children or youths,
- 11) Coordination between schools and agencies providing services to homeless children and youths,
- 12) 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) Adaptation of space and purchase of supplies for any non-school facilities made available under subsection (a)(2) to provide services under this subsection,
- 15) Provision of school supplies, including those supplies to be distributed at shelters or temporary housing facilities, or other appropriate locations, and
- 16) Provision of other extraordinary or emergency assistance needed to enable homeless children and youths to attend school and participate fully in school activities.

In addition to the standard activities that are allowable under the regular EHCY grant there are additional activities unique to the ARP-EHCY I which may include any expenses necessary to facilitate the identification, enrollment, retention, and educational success of homeless children and youth, such as:

- 1) providing wraparound services (which could be provided in collaboration with and/or through contracts with community-based organizations, and could include academic supports, trauma informed care, social-emotional support, mental health services, and may include culturally appropriate components);
- 2) purchasing needed supplies (e.g., PPE, eyeglasses, school supplies, personal care items);
- 3) providing transportation to enable children and youth to attend classes and participate fully in school activities, including summer school opportunities offered through ESSER funding;
- 4) purchasing cell phones or other technological devices for unaccompanied youth to enable the youth to attend and fully participate in school activities;
- 5) 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;
- 6) 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
- 7) 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.

In addition, the OPI’s EHCY program encourages districts to focus services on youth experiencing homelessness who are facing gaps in their learning or who may have dropped out or failed to graduate with their peers.

- 1) Temporary increases in FTE for staffing to provide outreach and identification of eligible students who may have been disconnected from school-based services due to school closures.
- 2) Credit recovery programs to assist seniors in obtaining the credits necessary to graduate under SB18 (state minimum diplomas - 20 credits), including opportunities available through Montana Digital Academy, virtual programs through private providers (such as Acellus, Odysseyware, Edgenuity, etc.), or in-person courses taught by district staff. Programs focusing on seniors are encouraged to offer a graduation ceremony to allow students to celebrate their achievement with family and friends where allowable due to ongoing Covid-19 restrictions.
- 3) Alternative diploma programs through HiSet Options.

- 4) Freshman orientation programs to help struggling middle school students to prepare for academic course work at the high school level.
- 5) Summer school programs with a primary focus on academics that may also include wrap-around services, social-emotional supports, physical education and health, and/or other services as appropriate.
- 6) Kindergarten transition programs to assist eligible students in gaining foundational skills in early literacy and early numeracy to prepare for entrance into kindergarten in the fall.
- 7) Family engagement opportunities to assist families in learning the skills necessary to support their child's academic success, including classes on math or literacy skills, technology, child development, social-emotional supports, mental health, suicide prevention and intervention, and other skills as appropriate. (Family engagement supports for the families of students experiencing homelessness must be **supplemental** and cannot be the same supports offered through other local, state, or federally funded family engagement programs.)