



FAQ on COVID-19 and Homelessness

Updated July 27, 2020

Note: We know many schools connected families with free or low-cost internet services when schools closed. Recently, we have received reports of at least one internet company automatically continuing enrollment past the promotional period, billing families, and sending bills to collection agencies when families cannot pay. We also have received reports of families receiving bills for exceeding the speed and data included in the free plans. We suggest advising families to contact internet providers immediately to cancel subscriptions with significant costs and ask about lower-priced options.

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Back-to-School 2020

1. Is there guidance out there on schools reopening?

Yes. SchoolHouse Connection published "[Preparing for School Reopening and Recovery: Considerations in Serving Children and Youth Experiencing Homelessness.](#)" It is the only guidance focused on the needs of McKinney-Vento students.

State-by-state guidance on a variety of topics, including meals, school buses, school schedules & classroom set-up, face covering, temperature checks & symptoms, and handwashing, is available from [The 74 and FutureEd](#). On June 3 the CDC updated their [Considerations for Operating Schools](#) to address basic questions of reopening. The CDC also published a [Schools Reopening Decision Tool](#).

2. If personal protective equipment (PPE) is required to return to school in the fall, do schools need to ensure that students experiencing homelessness have access to such equipment?

Yes. The McKinney-Vento Act requires state and local educational agencies to remove barriers to enrollment and retention in school. 42 U.S.C. §11432(g)(1)(I). “Enrollment” includes attending classes and participating fully in school activities. 42 U.S.C. §11434a(1). If PPE is required for students to attend classes or participate fully in school activities, schools must address that barrier for students experiencing homelessness. If schools are providing such equipment generally for all students, or for low-income students, then McKinney-Vento students should receive the equipment through those mechanisms and funds. If PPE is not generally available to students, then school should provide it to McKinney-Vento students using Title I, Part A funds or McKinney-Vento subgrant funds (where available.)

3. If schools reopen with full distance learning, how will liaisons be able to identify McKinney-Vento students, with the students not physically in school?

Liaisons will need to use many of the same identification techniques as usual, but with some important revisions. For example:

- Ensure liaisons have adequate capacity to identify McKinney-Vento students.
 - Use a [simple tool](#) to assess liaison capacity.
 - Use [COVID-19 relief funding](#) and [Title I, Part A funding](#) to increase liaison capacity.
 - Designate school site-level liaisons to increase the LEA’s overall capacity to respond to homelessness.
 - Use short [training materials](#) to ensure new liaisons are prepared to discharge their duties. Many schools and districts are reporting increased staff turnover due to COVID-19 and economic stressors.
- As a first step, reach out to the families and youth identified as homeless last school year. Given the economic impacts of COVID-19, they are more likely than usual to continue to experience homelessness this school year.
- Embed [questions](#) and [information](#) about homelessness in all school enrollment documents, including online enrollment systems.
- Ensure online enrollment systems are fully accessible to families and students experiencing homelessness. Use our guide to [Removing Barriers to Online Enrollment](#).
- Embed [questions](#) and [information](#) about homelessness in all school and district outreach efforts, including: food pick-up or delivery; mailing of learning packets; emails

or other communications to all parents/students; school/district automated calling systems; and the school/district website, Facebook page, and other social media.

- Ensure that [trained](#) staff are available to connect with McKinney-Vento families and youth over the summer and at the start of the new school year.
- Provide registrars, other enrollment personnel, and teachers with adequate [training on the McKinney-Vento Act](#).
- Connect with your local eviction court and sheriff's offices to ask them to provide McKinney-Vento information to families who are evicted.
- Ask local radio and TV news stations to talk about McKinney-Vento services in the news and during commercial breaks, and to provide the liaison's contact information.
- Engage all your community partners: motels, campgrounds, food banks, laundromats, legal services, faith communities, clinics serving low-income families, public benefits offices, 211, and others.
- Give serious, careful attention to factors that make equitable identification difficult and take steps to ensure racial and ethnic equity in identification.
 - Due to their disproportionate, negative, and sometimes fatal involvement with law enforcement and child protective services, African-American families may fear involvement of such systems if they reveal homelessness.
 - Undocumented students and families, and even many with legal visas, are increasingly afraid to discuss housing needs with official agencies like schools.
 - Language barriers can make online systems, housing questionnaires, and other identification processes difficult for families and youth to understand.
 - Native American students and families may not recognize certain living situations as homelessness. Clear and sensitive explanations of the McKinney-Vento Act definition of homelessness are essential.

4. A student is attending her school of origin in district A, but staying in a homeless situation in district B. If district A is opening their schools for in-person learning, and district B is doing distance learning only, is district B still obligated to provide the student transportation to the school of origin in district A?

Yes. In this scenario, [both](#) districts still have to work together to provide the student with transportation to the school of origin for in-person school. The McKinney-Vento Act requires transportation to the school of origin. In circumstances where a student is crossing district lines to attend the school of origin, the McKinney-Vento Act says the two districts can make any arrangement they like to share the cost and responsibility of providing the transportation. If they cannot agree on an arrangement, they have to split the cost 50/50.

Given what we're hearing about social distancing on buses, it might work out best for the district where the student is staying to provide a bus (since they are not busing anyone for distance learning currently), and the two districts can split the cost. It might be the case that the family has a vehicle and can drive to school, so the districts can split the cost of gas vouchers. There could be many different arrangements. The bottom line is that the McKinney-

Vento Act remains in effect, so the student needs to be provided with transportation to and from the school of origin.

5. Our state/district is requiring social distancing on school buses. This is going to tax our bus capacity significantly. How does this affect our obligations to provide transportation under the McKinney-Vento Act?

Social distancing or other changes to busing due to COVID-19 do not affect the local educational agency's (LEA) obligation to provide transportation under the McKinney-Vento Act, legally speaking. The McKinney-Vento Act remains in full effect. If a student was experiencing homelessness last school year and remains in a homeless situation for the upcoming school year, or became homeless over the summer, that student has the right to remain in the school of origin for the upcoming school year, if it is in the student's best interest to remain there. That legal provision applies for distance learning and in-person classes. If school buildings are open, then the LEA is required to provide transportation to the school of origin. The same is true for students who start the school year housed, but lose their housing during the school year.

Practically speaking, the challenges for keeping up with the demands for transportation are serious. Some ideas to ensure transportation is in place for McKinney-Vento students include:

- Prioritize McKinney-Vento students for school bus transportation.
- Make maximum use of gas vouchers for students and families who have access to vehicles.
- Use other available LEA vehicles for transportation of McKinney-Vento students, with appropriate safety and hygiene precautions.
- Locally, taxi drivers and ride share drivers may be out of work and willing to be hired as bus drivers.
- Given recent drops in taxi usage, local taxi companies may be willing to negotiate cost-effective contracts with the LEA to designate certain cars and drivers as LEA-only, sanitize vehicles between riders, and follow other guidelines to protect student safety.

6. How can schools streamline referrals to outside agencies? As we anticipate a difficult economic recovery and the potential for large-scale unemployment and evictions, students and families are likely to be in dire need of more support than schools alone can provide.

Given the immense challenges families and youth are likely to face this fall, it would make sense for schools and districts to incorporate referrals to community agencies as a regular part of their identification and enrollment procedures. Families and youth are likely to be in more need than ever with schools closed. Hygiene supplies are more critical than ever, food is likely to be a greater need than ever, and transportation is more complex than ever as social distancing is put in place. Schools can let students and families know about community resources and give students/families the opportunity to provide a release to send names and contact information directly to agencies. It is important, and legally required, to protect the privacy of families and students experiencing homelessness. However, schools and districts can find a balance that

makes connections to outside service providers faster and easier, while complying with the Family Educational Rights and Privacy Act (FERPA).

The US Department of Education has confirmed that FERPA releases can be electronic— an email or even a text saying the school can release a student’s name and contact information to an outside service provider is sufficient. For example, some liaisons have used group text apps like Remind to contact students and families. Remind protects the privacy and contact information of recipients. A Remind text, or any text or email message, could let parents/students know there about community programs and the services provides. The students/parents could text back “yes” if they consent for the school to connect them to an agency(s). It can be a quick and easy process for liaisons and families/students. The same kind of information and consent process can be used upon enrollment this fall.

If the school is using online enrollment, that system needs to include a mechanism to identify McKinney-Vento students. That same mechanism could include information about community agencies, with a simple check box to “check here if you want the school to connect you to this service.” Streamlining and facilitating connections to services has to be a primary goal, particularly with the pandemic and particularly as things go virtual.

More information about FERPA is available in this [brief](#), and SHC also offers strategies to [Remove Barriers to Online Enrollment](#).

7. How can we support our students’ and faculty’s mental health when the new school year starts, not only in light of COVID-19, but also this summer’s police violence and other racist attacks?

Schools can screen for trauma when school restarts, either in person or online. Simple, well-researched instruments include UCLA’s [COVID-10 Screen for Child/Adolescent PTSD](#); the [Structured Trauma-Related Experiences and Symptoms Screener](#); the [Child and Adolescent Trauma Screen](#) (CATS), and the [Child Reaction to Traumatic Events](#) (CRTES). Then, schools can implement trauma-informed training and practices available from the [National Child Traumatic Stress Network](#), [ACES Aware](#), or similar resources. A recent [review of programs with proven track records](#), many of which offer free tools and free online training, can help schools get started.

8. Where can I find up-to-date information about school reopening plans across the country?

The National Governors Association has launched a new [education-focused webpage](#), that includes a tracking table of state education reopening plans related to child care, summer camps, K-12 schools, and postsecondary institutions from states, territories, and the District of Columbia. The page also includes a compilation of national resources.

McKinney-Vento Implementation Generally

1. Am I correct that school liaisons should be working, according to their usual schedule or contract?

Yes. The McKinney-Vento Act is still fully in effect. McKinney-Vento liaisons should be considered essential personnel, due to their extensive statutory responsibilities under federal law. The liaison is responsible for ensuring identification, enrollment, and connection to services for homeless students.

2. We have a student who was in Texas, from Honduras, trying out for a soccer program when COVID hit. Honduras closed their boundaries before the student was able to return, so now the student cannot return to Honduras. The parents (who are in Honduras) sent the student to live with his grandmother in our district in another state. Is the student McKinney-Vento eligible?

Yes. The student is an unaccompanied homeless youth, living in a homeless situation and not in the physical custody of a parent or guardian. The student is “sharing the housing of others due to loss of housing, economic hardship or a similar reason.” In this case, it is impossible for the student to return home. That is a loss of housing, and the “similar reason” is the impossibility of returning home due to COVID. Even though his parents have a home— the student cannot get there.

3. A student came to our state to help a family member move over the summer, planning to return home before the start of school. During the summer, the child’s mother lost her job due to COVID-19. She has not lost her housing. The mother had COVID-19, but has recovered at home. At this time, the mother does not want the child to return home, for fear of him contracting COVID-19. Is the student McKinney-Vento eligible?

Based on this information, the student is not McKinney-Vento eligible. The student is not “staying with others due to loss of housing, economic hardship, or a similar reason.” If the mother had lost her housing, then he would be eligible. If the mother remains unemployed, and her economic hardship causes her to lose her housing, or to have to move in with others or into a smaller space that would be inadequate for the student, then he would be eligible. However, it appears that currently, the mother has housing and could have the student return to live with her. If the mother were actively ill and either in the hospital, or home but actively contagious, there might be an argument for eligibility for the student.

4. 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. The way in which the law is implemented must change, of course, but the law is in effect. It is more important than ever to continue with identification efforts. We expect many new families and youth to fall into homelessness due to the economic crisis, with many urgent needs. In addition, it is possible that some supplemental funding might be based on the number of homeless students identified. Therefore, identifying your newly homeless students is imperative at this time. North Carolina is repurposing a form created to respond to natural disasters to track homelessness related to COVID-19.

5. 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?

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). If the school is offering no services or activities whatsoever to any students at this time, then students experiencing homelessness also would 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 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.

If there is no distance learning in the LEA, the school/district still should complete the identification and code the students as McKinney-Vento in whatever data system is in use. This will be important in the event the LEA begins distance learning, offering services, and/or when schools re-open.

Many schools and districts use on-line enrollment systems. If those are not active at this time of year, it probably would be helpful to activate those now, to provide on-line enrollment capacity for students newly relocating to the district, including McKinney-Vento students.

6. Are we still required to make best interest determinations if parents or youth wish to change to the local school, or if they move and want to remain in their school of origin?

Yes. The McKinney-Vento Act is fully in force, including 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. The presumption in favor of the school of origin, and the priority given to the wishes of the parent or unaccompanied youth, also remain in effect. 42 USC 11432(g)(3)(A)-(B). In determining a student’s best interest, the impact of school closures and limited personnel certainly can be considered. Changing schools at this time may increase the likelihood of the student falling behind academically or missing out on services.

However, we have heard reports of increased mobility among students experiencing homelessness, due to motels imposing stay limits, campgrounds and parks closing, and shared housing arrangements falling apart under the increased stress of close quarters and fear of virus transmission. For many students who move, there may be important reasons to change to their local school. Better access to school meals may be one consideration. In short, the school of enrollment must depend on the student’s best interest.

7. A McKinney-Vento family has moved 75 miles away from the school of origin. The parent wants the children to remain in that school. We are currently providing distance learning, so I would like to keep the students enrolled. However, if we return to full or partial in-person school, that is a long distance to transport the students. What should we do?

The students can remain in the school of origin as long as it is in their best interest to do so (for the duration of their homelessness, and to complete the academic year in which they move into permanent housing). With distance learning in place, the physical distance from school is not much of an issue, and the benefits of keeping the students stable almost certainly outweigh any complications of distance. Therefore, the McKinney-Vento Act fully supports keeping the students in their school of origin, particularly since that is the parent’s wish. When schools reopen in whole or in part for in-person learning, you and the parent will need to re-examine best interest. The distance is long, but if school reopens on a hybrid model, it may be a matter of commuting only once or twice a week. There may be reasons why keeping the children in the same school is paramount. (Is the family expecting to move again imminently? Do the students have special needs?) On the other hand, if the students are starting a new school year in a new community, where the family is likely to stay for a while, and there are not special needs coming to play, it is likely to be in the children’s best interest to switch schools, given the distance. In that case, you could connect with the liaison in the local district to ensure immediate enrollment and a smooth transition.

8. Has there been any guidance on messaging to families and students who have found permanent housing, and so no longer will qualify as McKinney-Vento next school year? Would we still expect them to enroll in a new district next year, even if the school year starts with online learning instead of regular, in-person classes?

There has not been any guidance on this issue. The McKinney-Vento Act remains in full effect. Students who have moved into permanent housing during this school year will not be eligible to remain in their schools of origin next year, unless there are existing choice or out-of-boundary exemptions available to them. That is the case whether next school year begins in person or online. Given the current situation, it seems advisable to make families and students who have moved into permanent housing aware of this information as soon as possible, and to assist them in accessing online enrollment for next year in their new school district. It also might help to let the McKinney-Vento liaison in the new district know about the students and the transfer, so those liaisons can keep an eye out for the students. Given the extreme economic hardship resulting from COVID-19, many of those families and youth may fall into homelessness again in the fall. It would be good for them to be on the homeless liaison's radar.

It's also important to make sure families and students know to contact you if they fall back into homelessness over the remaining weeks of this school year, or over the summer. Again, given current economic challenges, families and students may lose their housing again quickly. If they become homeless during this school year or over the summer, their right to remain in the school of origin will reactivate. While that right is subject to the student's best interest, given all the upheaval and difficulties of online school enrollment, there are likely to be compelling reasons for them to remain in the school of origin.

9. Are schools *required* to provide McKinney-Vento students with hygiene items? Some have commented that with school closed, hygiene items are no longer necessary, since the students will not feel stigmatized among peers if they have poor hygiene at this time.

As the McKinney-Vento Act remains in full effect, LEAs are required 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..." While schools are closed, barriers to identification, enrollment, and retention may look different and require a different kind of consideration and response. Hygiene issues may be more relevant than ever as possible barriers, as they impact a student's health and safety, as well as their ability to concentrate on academics. When a student is dirty and unkempt, it can be difficult to concentrate on school work. Even in a virtual learning environment, poor hygiene can have immediate physical consequences such as itching and discomfort, creating a barrier to the

student's "enrollment and retention" in school. Hygiene supplies like toothpaste and toothbrushes that contribute to oral health also impact students' ability to concentrate on virtual learning. Enrollment includes full participation in school activities, and retention in school requires the student's participation in whatever virtual learning opportunities the school may be offering. In light of the current public health crisis, where hand-washing is the most important activity for preventing illness, soap is a basic supply that is essential to keep students and families healthy, such that students can participate in whatever school activities currently are available.

In addition, when a school cuts off tangible support such as hygiene products, in the middle of a pandemic during which the CDC and other health authorities have emphasized the importance of hand washing and other hygiene measures, it can create a very clear sensation in the student and family that the school does not care about the student's or family's basic health and safety, or their participation in the school. That strong sense of rejection and indifference toward students and families is a serious barrier to identification, enrollment and retention in school.

Outreach

1. How are school districts connecting with children, youth and families?

SchoolHouse Connection published a [Checklist for Keeping in Touch with Students and Families Experiencing Homelessness During School Closures](#) on May 8. Some states and LEAs are using "check-in" forms weekly with both currently and newly homeless students, to monitor needs. (Download an example of a check-in form from the New Mexico Public Education Department [here](#).) Kern County Superintendent of Schools Office, McKinney-Vento Homeless Education Services, has launched an [online referral form](#) for community partners to connect families and youth to McKinney-Vento liaisons for education-related needs. The form can be completed and submitted online via a googledoc, or emailed to the liaison. Washington state is reminding LEAs of the requirement to post information about McKinney-Vento out in the community where students and parents might see it. Grocery stores are an important location for such information at this time.

Here is what some districts we know are doing:

- San Antonio Independent School District has used a variety of techniques to reach over 96% of their students, including the efforts of high school music teacher Alejandro Jaime Salazar, who [enlisted members of the school band to track each other down](#)— woodwinds finding

woodwinds, brass finding brass. The McKinney-Vento liaison rallied school social workers to reach out early, filling in new and alternate contact information and assessing needs. “Social workers will be calling all the McKinney-Vento families to find out their current situation. Also, a needs survey was sent out via our webpage. We added a question to identify newly doubled-up students, so we can do outreach based on this self-identification.”

- Phoenix Union High School District: The new [Every Student, Every Day plan](#) gives each student’s advisory teacher, coupled with one other employee in the district—a counselor, principal, paraprofessional, or central office staffer—the responsibility for checking in by phone each day with a “caseload” of about 20-30 students. All participating teachers and staff are supplied with scripts for initial conversations with parents, and then with students. For example, when talking with students, the scripts begin with an affirmation telling them they’re missed, and then contain prompts about how to inquire about supports they might need to stay engaged in school. Every time they reach a student, the educator will log notes of the call in a secure database—for example, if a student is having problems connecting to online learning or if a family member lost a job. On the other side, counselors, principals, and case managers will use the notes to connect the families to resources. For those students it can’t initially reach, Phoenix Union will begin using emergency contacts to try to track down families, and it will also send some to conduct home visits using appropriate social-distancing techniques.
- San Diego Unified School District, CA: When current phone and email contact information does not work, teachers are asking students’ peers if they can contact the student via social media.
- Nashville, TN: “We are struggling to obtain accurate and current contact numbers, but once we have those we are going to do a call out with resources. Our district is posting information on their Facebook page, but I’m just not sure our families and unaccompanied youth are looking there for help. In the future, I plan to have a crisis plan in place and announced at the start of the year, during the identification process, so we have a plan in place.”
- Phoenix, AZ: “This is a good time to send out posters, flyers, brochures, etc. with information about the McKinney-Vento program to campgrounds, motels, and other areas where families and youth might seek shelters. Ask those places to post the information.”
- Eau Claire Area School District, WI: “For communication, we’ve created a Facebook profile for our homeless program and are connecting through Facebook messenger. We’re also texting and emailing families and students, and asking families to give us numbers of people they’re staying with, if possible.”
- Maslow Project, Southern OR: “I am using Facebook to connect with McKinney-Vento students and families. Also buying pay as you go phones.”

- Dallas, TX: “We are updating our website with as much information as possible, including food pantry information, in order to educate homeless families.”
- Sumner School District, WA: “We did outreach to local motel housing a variety of families from multiple districts, providing resource information sheets. Also, Building Points of Contact are checking in with all their individual students and families (about 160 students). They are reaching out to them and working on individual issues.”
- Bethel School District in Pierce County, WA: “Our counselors and Social Workers are connecting with students in regards to education and basic needs. They are looping us in and we are supporting on the basic needs side as much as possible!”

2. Are there any updated resources on supporting “attendance” with schools closed and classes switched to online?

Yes, Future Ed and Attendance Works just issued an updated [Attendance Playbook: Smart Strategies for Reducing Chronic Absence in the Covid Era](#). The playbook is accompanied by a [Guide to Using the Attendance Playbook: Smart Strategies for Reducing Chronic Absenteeism in the Covid Era](#), to help educators target supports to groups of students who need additional help to overcome barriers to attendance and participation. It offers general ideas and tools, as well as charts and checklists, to determine what interventions to try with students and their families. The seven steps will guide the development of a plan for decisions, implementation and reassessment once your strategies are in place.

3. Can we use McKinney-Vento or Title I, Part A funds to contract with additional personnel, or add FTE to existing personnel, to increase outreach? For example, to provide a mentor for a caseload of students?

Yes. This is an allowable use of both McKinney-Vento and Title I, Part A funds. Outreach to students experiencing homelessness, particularly at this time, is an important strategy to ensure they can access available educational opportunities. If staff need to dedicate additional time to outreach and mentorship due to school closures, funds can be used to increase the FTE of existing staff or hire additional staff. Also, the CARES Act created a \$13 billion Elementary and Secondary School Emergency Relief 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." The U.S. Department of Education (ED) [announced](#) the availability of funds on April 23. The amount each state education agency will receive is [here](#). The “application” is a [streamlined certification and agreement](#). ED plans to release funds to states within three days of receiving the completed agreement. ED also issued a [FAQ document](#) on those funds. We have created a [COVID-19 Checklist for State Education](#)

[Leaders on Children and Youth Experiencing Homelessness](#), to help State Coordinators and others advocate for funding and services for McKinney-Vento students.

4. How are school districts and charter schools staying connected with each other?

Northern KY: “We’ve been meeting regionally for years, which makes it easier for us to pass along information and stay in touch now, since we already have relationships built between districts.”

Virginia: “[The State Coordinator] sent an email to all liaisons. They hit reply all and shared their processes and how to find out what was going on in their communities. Liaisons with families in those areas could make sure the info was shared.”

ESC Region 14, TX: “We have zooms set up for our liaisons to connect and share out strategies and challenges.”

South FL tri-county District Liaisons also are meeting by zoom.

5. What are some ideas for districts if they do not have access to a work phone/office phone for connecting with their families, without using their personal phones?

- Use Google Voice or a Skype number.
- Forward your work phone if you can.
- Enter *67 to block your number.

6. We are ensuring that our homeless youth receive meals and work packets during the school closings, including through a delivery each day to a youth shelter. Are foster care liaisons under the same type of responsibility to make sure that youth in foster care have meals and work provided, even if it requires additional measures as delivery to the shelter for foster youth?

Yes, the school district has that responsibility. Foster care points of contact don’t have specific duties set out in the law, like McKinney-Vento liaisons do. The responsibility for making sure youth in foster care have their needs met falls primarily on to child welfare case workers. However, school districts have the responsibility to provide equitable access to learning opportunities to all students. That includes youth in care, McKinney-Vento youth, and all students. Therefore, the district has to make sure youth in foster care have access to whatever educational opportunities are available during school closures— distance learning, packets, online connectivity, etc.

The foster care point of contact at school should be working with child welfare case workers as needed, to provide work packets and other educational resources to the students. Foster youth

must be included in the deliveries the district is doing, so they can get their meals and packets on time.

7. How can we maintain safety while doing in-person outreach or deliveries of food or materials?

It is important that everyone follow the CDC's latest safety guidelines. We have heard of schools leaving food and materials in a box outside students' doors at a home where they are staying or at a motel. The student/family come out to claim the items when the person making the delivery has stepped away. The delivery can include alcohol wipes, or a bleach solution with a sponge, so the student/family can wipe down the items before bringing them inside. We also have heard of people putting bins at the end of their driveway, especially in rural areas, where food and items can be left. The family comes out later to claim the items from the bin. Another source of information may be UC Berkeley's School of Public Health's Community Action Team, who has a strong history of advocacy for youth and students experiencing homelessness. The Team has produced a [series of health and safety videos](#) for people providing services to youth experiencing homelessness.

Privacy

1. Are there general FERPA resources and information that focus on the issues of students experiencing homelessness?

Yes. SchoolHouse Connection has an extensive [FERPA](#) Q&A, webinar, and two publications to answer all the most common FERPA questions and issues that arise regarding students experiencing homelessness in particular.

2. Is it appropriate for a liaison to use a group text message to reach unaccompanied youth?

Privacy laws are still in full effect, so all communications should be careful not to share personally identifiable information and to protect the privacy and safety of all students. Therefore, group text messages or emails should only be used if you are able to hide the numbers or emails from other recipients. Remind is an app that allows for group contact without sharing contact information.

3. Can we share names with campgrounds to help us locate families to deliver meals? The campgrounds have a database and can tell us where families are staying now.

Privacy laws are still in full effect, so all communications should be careful not to share personally identifiable information and to protect the privacy and safety of all students. The Department of Education has come out with [guidance](#) about privacy in the context of COVID-19. The Student Privacy Policy Office at ED also did a [webinar on FERPA and Virtual Learning](#) in March.

Providing a list of names to a campground, motel, or other third party is not allowable without parental consent. However, you could ask campgrounds/motels to give you the number of school-age children, or unaccompanied youth, staying at the campground or motel, and you could go to the campground or motel with that number of meals. This would be a good way to connect with those families and youth, and provide information about distance learning and/or other available services. You also could ask motels and campgrounds to post information about educational services and resources, McKinney-Vento rights, and local contact information.

4. Can we use group texts, or apps like Remind, to reach our students, if those methods allow all recipients to see the names and contact information of students/families?

Privacy laws are still in full effect, so all communications should be careful not to share personally identifiable information and to protect the privacy and safety of all students. You may be able to protect names in group texts, so numbers appear without associated names. Or, you can just send multiple individuals texts (time consuming, but the safest). Remind can be set so no student sees other students' names. It can be used just as an announcement forum for notices.

5. I am a liaison, and I would like to bring my McKinney-Vento case notes from my office to my home. They are in binders, and I have a locked file cabinet where I can store them. Can I bring my McKinney-Vento case notes home?

Yes. First, case notes might not even be subject to FERPA. "Records that are kept in the sole possession of the maker, are used only as a personal memory aid, and are not accessible or revealed to any other person except a temporary substitute for the maker of the record" are specifically excluded from the definition of education records covered by FERPA. It sounds like these paper case notes may meet that exclusion.

However, even if the case notes are subject to FERPA, FERPA's protections are triggered when there is a "disclosure of personally identifiable information from the student's education records." In this scenario, staff who have the legal right to access the information, simply are accessing it in a different location. As long as personally identifiable information is not

disclosed to others in the home (or out of the home) there is no FERPA issue. By taking adequate precautions to prevent disclosure, such as keeping the information locked up, accessing just one binder at a time, never leaving it unattended while others are around, etc., this is in line with FERPA at a time when schools are closed due to COVID-19.

Funding and Use of Funds

1. Has the U.S. Department of Education issued any guidance on funding flexibility?

Yes. On April 6, 2020, the U.S. Department of Education (ED) announced several [funding flexibilities](#) to help states and local educational agencies (LEAs) respond to COVID-19 and school closures. Of most relevance for children and youth experiencing homelessness are two waivers to allow funds from previous fiscal years to be spent over the next school year. Specifically, states can request waivers to allow LEAs to:

- Carry over more than 15 percent of their FY 2019 Title I, Part A funds into FY 2020 (to be used after September 30, 2020); and
- Extend the availability of FY 2018 Title I, Part A and McKinney-Vento funds until September 30, 2021. (This extension also applies to funds under: Title I, Part C; Title I, Part D; Title III, Part A; 21st Century; and several other ESEA programs.)

States can submit ED's [waiver request form](#) to take advantage of this new funding flexibility. ED expects to approve waiver requests within one business day of submission.

2. 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 a caveat. With schools closed and students engaged in distance learning (whether optional or required), internet connectivity is essential. Most districts are providing these resources using regular district funds, or Title I funds. Students experiencing homelessness should receive whatever other students are receiving, *before* going into the Title IA homeless set-aside or McKinney-Vento subgrant funds. Also, technology and connectivity are allowable uses for the \$13 billion CARES Act Elementary and Secondary School Emergency Relief Fund.

If internet connections are not available through other means, 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 nonhomeless 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 IA set-aside funds, the internet connection falls well within ED'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 absolutely necessary for students to take advantage of educational opportunities at this time. If a company in your area is offering free internet, and your homeless students are able to access that service, then you should not use Title IA funds to pay for internet. However, often, students will need to pay a connection fee or some monthly fee for internet, which they are unable to afford. No other resources are reasonably available.

3. We are working with districts to provide hotspots through Title 1 and community resources before tapping McKinney-Vento funds for them - does that make sense?

Yes, absolutely. McKinney-Vento students are Title I students, and they should be served through Title I funding. If the district or school is providing internet to low-income students with Title IA funds, McKinney-Vento students also should get internet with Title IA funds. With school closures, many schools and districts are providing hotspots and devices to all students or to all low-income students. McKinney-Vento students must have access to those resources. McKinney-Vento funding is intended to be the "sprinkles" on top of the icing (Title I) on top of the cake (general education). In fact, the law is clear that: "Services provided under this section shall not replace the regular academic program and shall be designed to expand upon or improve services provided as part of the school's regular academic program." 42 USC 11433(a)(3). McKinney-Vento funds cannot be used for hotspots or devices that the district is providing to all students.

4. Some internet companies are offering free service right now, but not to families that have an outstanding bill. Can McKinney-Vento funds be used to pay those bills?

With schools closed and students engaged in distance learning (whether optional or required), internet connectivity is essential. Using public funds to pay a past due utility balance generally is not allowable. It is advisable to seek other ways to provide connectivity, such as providing a mobile hotspot. Mobile hotspots meet the current obligation to ensure "enrollment" for McKinney-Vento students (which includes full participation in school activities), without stretching the allowable uses of funds. If, for some particular reason, there is absolutely no way for a student to get online, other than to pay an outstanding bill so they can connect to a local internet company, then it may be appropriate to pay that bill, given school closures.

5. Are pre-paid cell phones an approved use of Title 1 funds?

In this time of virtual learning, electronic devices are absolutely necessary for students to take advantage of educational opportunities. Students must have appropriate devices to complete assignments and participate fully in the school activities being offered. A pre-paid cell phone may be one device that can allow students to participate fully in school. The pre-paid cell phone also may provide internet connectivity for students to stay connected to virtual learning. If the cell phone is “reasonable and necessary to assist homeless students to take advantage of educational opportunities,” and if there are not other sources of devices or connectivity (for example, if your school is giving all students mobile hotspots and Chromebooks), then using Title IA funds, for a pre-paid cell phone probably falls within ED’s [guidance](#).

The Community Partnership Charter School in New York City has purchased pre-paid phones for their students in transitional housing and find that they are working well for access to digital instruction.

6. Can we purchase Chromebooks for McKinney-Vento students?

In this time of virtual learning, electronic devices are absolutely necessary for students to take advantage of educational opportunities. Students must have appropriate devices to complete assignments and participate fully in the school activities being offered. A Chromebook may be one device that can allow students to participate fully in school. If your school or district is providing Chromebooks or other devices to low-income students with Title IA funds, McKinney-Vento students also should get internet with Title IA funds. McKinney-Vento students are Title I students, and they should be served through Title I funding. With school closures, many schools and districts are providing hotspots and devices to all students or to all low-income students. McKinney-Vento students must have access to those resources.

If there are no other options for McKinney-Vento students to receive the devices they need to participate fully in school activities, then McKinney-Vento funds can be used.

7. Can gift cards for food be paid for with Title I funds?

Yes (with some caveats) according to existing guidance. At this time, existing guidance on uses of Title I funds remains in effect. [Existing guidance](#) on allowable uses of Title IA homeless set-asides (section M-4) is below. Please note that food is specifically listed as an allowable use of the set-aside, “to help homeless students effectively take advantage of educational opportunities.” 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.

“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)).”

One district has developed an [online form](#) to use with parents when disseminating gift cards. It is a google doc that can be completed on a phone or other device.

8. If rural schools do not provide meals during this time, can McKinney-Vento or Title I, Part A funds be used to purchase food?

If schools are completely closed down, with no required or optional virtual learning opportunities and no meals, then it would not be appropriate to use Title I or McKinney-Vento funds to provide meals. There would be no connection between the food and education. However, if schools are providing some optional or required learning opportunities, then food can be provided if needed to help students take advantage of those opportunities.

9. Is there specific information or guidance that states that we can use McKinney-Vento or Title I funds to purchase gift cards that we can provide to our district business office?

[The Department of Education's McKinney-Vento guidance](#) references providing gas cards on page 31. This is the only explicit reference to gift cards. However, the allowable uses of McKinney-Vento funds, and the Title IA homeless set-aside, are broad. See the previous question for Title IA guidance. There are 16 allowable uses for McKinney-Vento funds, including “(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). Even if the district has rules against gift cards, the McKinney-Vento Act specifically allows for “extraordinary assistance.” The McKinney-Vento Act overrules district procedures on everything from residency to immunizations to the rights of youth. The very purpose of the Act is to override district procedures to accommodate the unique needs of homeless students. In fact, 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.” 42 USC 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.

One district liaison has adopted the practice of asking parents and youth to text a photograph of the receipt when they use a gift card provided by the district. The liaison provides the receipts to the business office upon request. Another district has developed an [online form](#) to use with parents when disseminating gift cards. It is a google doc that can be completed on a phone or other device.

10. How would gift cards be distributed?

Gift cards could be distributed where food or other items are distributed, whether by delivery or pick-up. Online gift cards also can be sent by email or text, just by forwarding the link to the card.

11. Are local educational agencies able to use McKinney-Vento funding for motels?

No, not at this time. The McKinney-Vento Act's allowable uses of funds remain in effect. Housing costs, including motels, are not allowable.

12. Can funds for summer learning be used for seniors starting college in the fall who want to take summer courses at the college they will be attending?

If those students are still enrolled in high school, funds can be used to pay for dual enrollment college classes. Those classes are a great way for McKinney-Vento students to get a jump on college credits, at no cost to them. They can help keep students engaged in high school and on track for graduation. (See 42 USC 11433(d)(7).) However, if the students have graduated and no longer are part of your school or district, then you cannot use district funds to pay for their college classes.

13. I have hygiene items in my office currently. How do I get them out while still documenting that only McKinney-Vento students are getting the items as required by my grant?

Contact your State Coordinator to discuss waivers of certain elements of your grant requirements, considering the current situation of school closures. You certainly can and should do your best to distribute items only to McKinney-Vento students through your own outreach. You could package them in bags or boxes with a student's name on them, so when students/families receive school meals through delivery or grab-and-go, the student/family can pick up their hygiene box, as well. (The box or bag should not indicate the student's homeless status). Some districts also are using the US Mail to mail food, hygiene products, and other items to wherever students are staying. They are reaching out to families and students to confirm a current mailing address.

If you are taking reasonable steps to ensure the items go to McKinney-Vento students, but some end up with nonhomeless students, you should not be penalized for that, at this unique moment in time. When services are provided on school grounds, McKinney-Vento funds can be used "to provide the same services to other children and youths who are determined by the local educational agency to be at risk of failing in, or dropping out of, school." 42 USC 11433(a)(2)(B)(i). While that clause is not completely applicable to this question, it shows that Congress intended to allow McKinney-Vento funds to be used for services for nonhomeless, at-risk students, in certain circumstances. A limited waiver of grant requirements to document that only McKinney-Vento students receive hygiene products seems reasonable, in the particular circumstances of coronavirus response, and if the liaison is making all reasonable efforts to ensure that only McKinney-Vento students are receiving the items.

14. Do you think there will be an increase of Title 1 funding and additional funding for McKinney-Vento students specifically?

On Friday, March 27, the president signed the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), H.R. 748. This \$2 trillion package includes a wide range of funding and policy measures to respond to the coronavirus outbreak, including to address the early care, education, and emergency housing needs of children, youth, and families. Among other things, the package includes an Elementary and Secondary School Emergency Relief Fund of \$13 billion to state educational agencies (SEAs), which will be distributed to SEAs based on the Title I, Part A formula. SEAs must distribute at least 90% of these funds to local educational agencies (LEAs), also based on the Title I Part A formula. Allowable uses of funds specifically include activities authorized under the education subtitle of the McKinney-Vento Act, and activities to address the unique needs of students experiencing homelessness, including how outreach and service delivery will meet their needs.

The U.S. Department of Education (ED) [announced](#) the availability of Elementary and Secondary School Emergency Relief Funds on April 23. The amount each state education agency will receive is [here](#). The “application” is a [streamlined certification and agreement](#). ED plans to release funds to states within three days of receiving the completed agreement. D also issued a [FAQ document](#) on those funds. We have created a [COVID-19 Checklist for State Education Leaders on Children and Youth Experiencing Homelessness](#), to help State Coordinators and others advocate for funding and services for McKinney-Vento students.

Additional supplemental funding may come out in future coronavirus stimulus bills. SHC is advocating for dedicated funding for McKinney-Vento programs and students.

15. What's the projected timeline for supplemental funds to get to the front lines?

CARES Act funds have to be out to states within 60 days of March 27. Hopefully, since states have to allocate funds to LEAs according to a formula, the funds will flow very quickly from states to LEAs. There are 3 categories of education funds available through the CARES Act:

- Elementary and Secondary School Emergency Relief Fund: \$13 billion to state educational agencies (SEAs)
- Governor’s Emergency Education Funds: \$3 billion to governors
- Higher Education Emergency Relief Fund: \$14 billion to institutions of higher education, at least half of which must be used for emergency financial aid grants to students for expenses related to the disruption of campus operations due to coronavirus (including eligible expenses under a student’s cost of attendance, such as food, housing, course materials, technology, health care, and child care). On April 9, the U.S. Department of Education made \$6 billion of these funds available to institutions, to provide directly to

students. A list of distribution of CARES Act higher education funding, by institution, including the minimum allocation for emergency financial aid grants, is [here](#).

On April 23, 2020, the U.S. Department of Education (ED) [announced](#) the availability of Elementary and Secondary School Emergency Relief Funds. The amount each state education agency will receive is [here](#). The “application” is a [streamlined certification and agreement](#). ED plans to release funds to states within three days of receiving the completed agreement. D also issued a [FAQ document](#) on those funds. We have created a [COVID-19 Checklist for State Education Leaders on Children and Youth Experiencing Homelessness](#), to help State Coordinators and others advocate for funding and services for McKinney-Vento students.

On April 14, 2020, the US Department of Education published the [application](#) for \$3 billion in Governor’s Emergency Education Funds. In Part C, “Uses of Governor’s Emergency Education Funds,” the application has one question that addresses the needs of students experiencing homelessness specifically:

“2. Does the State intend to use any of the awarded funds to support technological capacity and access – including hardware and software, connectivity, and instructional expertise – to support remote learning for all students? If so, please describe how the State will achieve its goals for both LEAs and IHEs.

- a. Please describe the strategies used to serve disadvantaged populations listed in Sec. 18003(d)(4) of the CARES Act.”

The populations listed in the cited section of the CARES Act include students experiencing homelessness, as well as foster care youth, English learners, children with disabilities, racial and ethnic minorities, and low-income students.

In addition, Governor’s Emergency Education Funds specifically can be used to provide support to LEAs or other education-related entities for activities authorized under the McKinney-Vento Act’s Education of Homeless Children and Youth Program. It is important to advocate directly with Governors’ offices to ensure some of the Emergency Education Funds are targeted specifically to meet the needs of children and youth experiencing homelessness. We have created a [COVID-19 Checklist for State Education Leaders on Children and Youth Experiencing Homelessness](#), to help State Coordinators and others advocate for funding and services for McKinney-Vento students.

The amount each state will receive is available [here](#). The full list of allowable uses for Governor’s funds is to:

- provide grants to LEAs that the SEA deems most significantly impacted by coronavirus, to support the LEAs' ability to continue to provide educational services to their students and to support the on-going functionality of the LEA;
- provide grants to institutions of higher education that the Governor determines have been most significantly impacted by coronavirus, to support their ability to provide educational services and support the on-going functionality of the institution; and
- provide support to any other institution of higher education, LEA, or education related entity that the Governor deems essential for carrying out emergency educational services to students for authorized activities described in section 18003(d)(1) [this specifically includes activities authorized by the McKinney-Vento Act's Education of Homeless Children and Youth Program] of this title or the Higher Education Act, the provision of child care and early childhood education, social and emotional support, and the protection of education-related jobs.

16. Are any states providing funding or other legislation related to schools and COVID-19?

Yes, many states are. A [state-by-state legislation tracker](#) is available from FutureEd.

Transportation

1. A student is attending her school of origin in district A, but staying in a homeless situation in district B. If district A is opening their schools for in-person learning, and district B is doing distance learning only, is district B still obligated to provide the student transportation to the school of origin in district A?

Yes. In this scenario, both districts still have to work together to provide the student with transportation to the school of origin for in-person school. The McKinney-Vento Act requires transportation to the school of origin. In circumstances where a student is crossing district lines to attend the school of origin, the McKinney-Vento Act says the two districts can make any arrangement they like to share the cost and responsibility of providing the transportation. If they cannot agree on an arrangement, they have to split the cost 50/50.

Given what we're hearing about social distancing on buses, it might work out best for the district where the student is staying to provide a bus (since they are not busing anyone for distance learning currently), and the two districts can split the cost. It might be the case that the family has a vehicle and can drive to school, so the districts can split the cost of gas vouchers. There could be many different arrangements. The bottom line is that the McKinney-Vento Act remains in effect, so the student needs to be provided with transportation to and from the school of origin.

2. Our state/district is requiring social distancing on school buses. This is going to tax our bus capacity significantly. How does this affect our obligations to provide transportation under the McKinney-Vento Act?

Social distancing or other changes to busing due to COVID-19 do not affect the local educational agency's (LEA) obligation to provide transportation under the McKinney-Vento Act, legally speaking. The McKinney-Vento Act remains in full effect. If a student was experiencing homelessness last school year and remains in a homeless situation for the upcoming school year, or became homeless over the summer, that student has the right to remain in the school of origin for the upcoming school year, if it is in the student's best interest to remain there. That legal provision applies for distance learning and in-person classes. If school buildings are open, then the LEA is required to provide transportation to the school of origin. The same is true for students who start the school year housed, but lose their housing during the school year.

Practically speaking, the challenges for keeping up with the demands for transportation are serious. Some ideas to ensure transportation is in place for McKinney-Vento students include:

- Prioritize McKinney-Vento students for school bus transportation.
- Make maximum use of gas vouchers for students and families who have access to vehicles.
- Use other available LEA vehicles for transportation of McKinney-Vento students, with appropriate safety and hygiene precautions.
- Locally, taxi drivers and ride share drivers may be out of work and willing to be hired as bus drivers.

Given recent drops in taxi usage, local taxi companies may be willing to negotiate cost-effective contracts with the LEA to designate certain cars and drivers as LEA-only, sanitize vehicles between riders, and follow other guidelines to protect student safety.

3. Can students continue to use their Orca (public transportation) cards for transportation?

Absolutely. The McKinney-Vento Act requires transportation to the school of origin, and it also requires LEAs to eliminate barriers to "enrollment and retention of homeless children and youths in schools." 42 USC 11432(g)(1)(I). Enrollment means "attending classes and participating fully in school activities." 42 USC 11434a(1). In our current situation of massive school closures, participating in school activities means participating in school meals, virtual learning, and any other activities the LEA is providing at this time. Students may need public transportation to participate in school activities. LEAs should continue providing transportation support as needed to eliminate barriers to enrollment (participation) and retention in school.

4. Are we allowed to use McKinney-Vento funds to provide transportation to child care during this time?

Yes (with caveats). At this time, [existing guidance on uses of McKinney-Vento funds](#) remains in effect. Allowable uses of funds may be expanded, and we are advocating actively for such flexibility. However, as of March 20, 2020, existing guidance remains in effect. One allowable use of funds is: “(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). In this time of school closures, a child’s participation in child care may be necessary to permit a student to participate fully in school activities, be that meals, virtual classes, or other activities. If transportation to child care is necessary to enable a student to participate in school activities, then yes, McKinney-Vento funds may be used to provide transportation to child care.

5. How can we get bus passes to students and parents with school closed?

Bus passes can be distributed where food or other items are distributed, whether by delivery or pick-up. Some districts also are using the US Mail to mail items to wherever students are staying. They are reaching out to families and students to confirm a current mailing address.

Food

1. What is coming to help provide food over the summer?

Meals-to-You: Participating rural school districts are enrolling families in the Meals-to-You program. Meals-to-You boxes contain 20 nutritious meals—10 breakfasts and 10 lunches—to cover the meals children would normally receive at school over two weeks. Boxes are delivered directly to children's doorsteps via the U.S. Postal Service and other delivery services. Meals-to-You is currently active in 12 states and is expanding to 23 additional states and Puerto Rico. Enroll now, as deadlines are closing quickly.

USDA also has created the Coronavirus Food Assistance Program (CFAP). Through this program USDA will partner with regional and local distributors, whose workforce has been significantly impacted by the closure of restaurants, hotels and other food service entities, to purchase up to \$3 billion in fresh produce, dairy and meat products. Participating distributors and wholesalers will package a pre-approved box of fresh produce, dairy and meat products for delivery to food banks, community and faith-based organizations and other non-profits. Once contracts are awarded to distributors, USDA will supply the full list of awardees and their contact information on the Farmers to Families Food Box Program [website](#).

USDA also has launched a [website](#) to help find meals locally when schools are closed. In addition, the National Hunger Hotline offers information for individuals and families on how to

obtain food. Hotline staff connect callers with emergency food providers in their community, government assistance programs, and various social services. The service is available in English and Spanish, Monday–Friday from 7 a.m. to 10 p.m. ET.

- English: 1-866-3-HUNGRY (1-866-348-6479)
- Spanish: 1-877-8-HAMBRE (1-877-842-6273)

2. What guidance has the USDA Food and Nutrition Service (FNS) put out to facilitate access to school meals during school closures?

FNS has waived the requirement to serve school [meals in a congregate setting](#). In addition, FNS is [allowing delivery](#) of school meals and has [waived meal time](#) requirements. Parents and guardians can pick up or receive meals for their children [without the children being present](#). FNS is updating their guidance very frequently. Their [COVID-19 website](#) has all the latest information.

3. Since our families lack transportation to pick up meals at designated school locations, we have asked that a family be given permission to pick up food for others, but we are told that USDA is not permitting that. Suggestions to overcome this barrier?

The USDA informed us that USDA has given waivers to states to allow volunteers to pick up and deliver meals. However, it all depends on what the state and the school are allowing. You may need to [contact your state school lunch program contact](#). There is written guidance from USDA allowing [parents and guardians to pick up meals](#) for their own children, without the children being present. Many districts are delivering meals to students using school buses and through community partnerships.

4. Can students who are staying in one district, but attend school in a different district (school of origin), access school meals in the district where they are staying, if that is easier for them to access?

Yes. The USDA confirmed for us in an email on April 6 that schools may provide food to anyone. Most school districts are operating their school meals programs as summer food service programs right now in this national emergency, through a USDA waiver. Summer food service programs are almost always “open” sites. This means they must serve all children 18 years old and under. It doesn’t matter if they came from Alaska just to live with a relative for one week. **NOTE:** It is unclear whether this policy will remain in effect for the 2020-2021 school year. We are advocating directly with USDA and USICH to extend this flexibility.

5. How can families find information about where to get meals?

No Kid Hungry offers a national texting service that allows parents or students to find feeding sites near them by texting 'FOOD' to 877-877 or 'COMIDA' to 877-877 for information in Spanish. USDA also has launched a [website](#) to help find meals locally when schools are closed. In addition, the National Hunger Hotline offers information for individuals and families on how to obtain food. Hotline staff connect callers with emergency food providers in their community, government assistance programs, and various social services. The service is available in English and Spanish, Monday–Friday from 7 a.m. to 10 p.m. ET.

- English: 1-866-3-HUNGRY (1-866-348-6479)
- Spanish: 1-877-8-HAMBRE (1-877-842-6273)

6. How are school districts providing food to students?

- Mesa Public Schools, AZ: “My district is currently implementing a strategy to have meals delivered to shelters and transitional housing program contacts for them to distribute to their clients. We have a well maintained list of McKinney-Vento students that have current email addresses and phone numbers. We are going to send a message out through School Messenger (voicemail, text and email) to provide instructions about where to receive meals, even if they do not reside in the Mesa Public Schools boundaries.”
- “In Washington state, there are Meals on Wheels programs where schools are delivering to bus stops.”
- “In Seattle/King county, the McKinney-Vento liaisons shared all of our meal info in a shared handout to connect our families to lunches closest to them.”
- Methow Valley Schools, WA: “We have been issuing food gift cards to McKinney-Vento families. We were contacted by a parent yesterday who reported that someone tried to sell her a \$100 food card for cash outside the grocery store. We are revamping our system so that we are creating our own voucher that says explicitly “Food Only.” The cards we have been distributing, which we purchased from a local grocery store, do not say “Food Only” so we have been writing it on the cards with permanent ink.”
- White River School District: “We are distributing breakfast and lunch to our students at bus stops.”
- Ventura County, CA: “LEAs are providing breakfast and lunch to all students that come to the designated schools during specified hours. I am working with a community partner to get hygiene kits.”
- Washington state and Michigan: Any student can go to any food pick up and get meals.
- North Thurston, WA: “Our district is feeding all kids and have our family and youth resource center with get and go food, school supplies, hygiene supplies, books, and self-stable food.”
- Phoenix, AZ: “We are working with a large family shelter to see how we can partner to deliver meals to the site.”
- Cherokee County, GA: “School buses running regular routes 2x weekly, handing out food at regular bus stops; buses are going for extended periods of time into known impoverished communities.”
- ND: “Students living out of this district are not receiving school meals, so as the liaison I have been taking out these items to our students.”

- In California: “[Healthy Eating.org](https://www.healthy-eating.org/) compiled a comprehensive list of the various School Meal Sites throughout California. You can narrow it down by the County and school district. Healthyeating.org also has helped with locating grab and go programs in neighboring districts for our families housed out of district.”
- Ohio: “Some Ohio schools are using their buses and having aides ride along to deliver meals. Rural folks with long driveways are leaving bins at the end of their driveways and the school district places a week’s worth of school meals in the bin. (Bins are sanitized.) Schools may want to consider providing covid-10 preparedness materials in the meal bags.”
- Sumner School District, WA: We are delivering sack breakfasts and lunches to motel bound students experiencing homelessness, as well as 'backpack buddy' food sacks that would normally go home weekly with students.

7. Are LEA's required to provide an option to receive food and nutrition services during the school closure? I am specifically asking for highly mobile students. They lack transportation and do not reside near one of our food distribution locations.

LEAs are not required to participate in the school meals program. However, if they do participate in school meals, they need to provide those meals equitably for all students. There are two arguments for this. First, the McKinney-Vento Act requires LEAs to eliminate barriers to “enrollment and retention of homeless children and youths in schools.” 42 USC 11432(g)(1)(I). Enrollment means “attending classes and participating fully in school activities.” 42 USC 11434a(1). In our current situation of massive school closures, participating in school activities means participating in school meals, virtual learning, and any other activities the LEA is providing at this time. Therefore, LEAs must ensure students experiencing homelessness can participate in school meals. Second, although this is an unprecedented situation, with no clear written guidance regarding requirements for meal delivery, it seems reasonable to presume it would be a civil rights violation if students in poverty, in foster care, experiencing homelessness, or in other vulnerable positions, are not able to access school meals, while other students are accessing meals.

8. Has anyone figured out a good grocery delivery option for families, in case communities begin shelter-in-place?

Delivery services are in flux in terms of availability and timing. However, Amazon, CostCo, Kroger, Albertsons, Walmart, Sprouts, and many other delivery options are available. It depends which services are available and working in your area.

9. Supplemental funding from Congress is now available so that all households with children who were receiving free or reduced price meals at school before their school closed, are now eligible to receive cash benefits through the Supplemental Nutrition Assistance

Program (SNAP), even if they were not receiving SNAP previously. Can we share this information with parents and youth now? Or will there be state-specific guidance sent out?

All households with children who were receiving free or reduced price meals at school before their school closed, are now [eligible to receive cash benefits through the Supplemental Nutrition Assistance Program](#) (SNAP), even if they were not receiving SNAP previously. This is called the Pandemic-EBT (P-EBT) program, and 49 states have now been approved to participate. The process for obtaining benefits varies by state, which makes it difficult to provide blanket directions, but the Food Research and Action Center has a terrific [FAQ and map](#) you can click on to get to each state's website for more information. Some states are mailing P-EBT cards to anyone who qualifies, but given the address issues for youth and families experiencing homelessness, they might need to provide a current mailing address to get their card. States generally have a process for that, though it varies. Other states are requiring an application, and those deadlines are coming up over the remainder of the summer, so it would be great if liaisons could help students apply before they miss out.

Academics, Testing, and Internet Connectivity

1. How are states and school districts supporting full academic participation for students at this time, with schools closed?

[Spectrum](#), [Comcast](#), [Xfinity Wifi](#), and [Cox](#) are offering free internet offers, with some restrictions. [ATT](#) also has an internet promotion available. Digital Wish offers [Mobile Beacon Hotspots](#) for \$120 per year. [T-Mobile's EmpowerED](#) program offers a hotspot with unlimited high speed data for \$20 a month. There probably are other local providers offering internet and hotspot specials, as well.

Recently, we have received reports of at least one internet company automatically continuing enrollment past the promotional period, billing families, and sending bills to collection agencies when families cannot pay. We suggest advising families to contact internet providers immediately to cancel subscriptions with significant costs and ask about lower-priced options. We also have received reports of families receiving bills for exceeding the speed and data included in the free plans.

- In Idaho: Some districts have been working with local internet providers, and many have added additional wifi routers to dead spot areas. Most rural districts are doing a hybrid

of "packet" learning in addition to on-line learning options, to address areas where wifi and cell signals do not reach.

- In Florida:
 - The Florida Department of Education and K-12 school districts are instructed to redirect unspent 2019-2020 funds from Reading Scholarship Accounts, the Reading Instruction Allocation, the Digital Classroom Allocation and the Teachers Classroom Supply Assistance Program to help low-income students purchase digital devices and establish Internet services.
 - In order to facilitate the remote connection between teachers and students, K-12 school districts are further permitted to redirect unspent Title 2 funds to help low-income students purchase digital devices and establish Internet services.
 - K-12 school districts are permitted to redirect unspent 2019-2020 funds from the Safe Schools and Mental Health allocations to virtual and telephonic mental health counseling services for students who need emotional support due to COVID-19.
- New Orleans Public Schools has purchased 5,000 hotspots and 10,000 Chrometables. McKinney-Vento students will be offered these tools first.
- Hernando County Public Schools, FL: "We are prioritizing McKinney-Vento students in the distribution of school-issued laptops and reaching out to all unaccompanied youth to ensure they have the free Sprint phones and that we are following up on their basic and housing needs."
- Green Bay, WI: "We sent our students home with Kajeets, which are mobile hotspots that provide their households with wifi. Our district has a certain number of these devices that we purchased and can loan out to students and families in need."
- Spokane, WA: "Our district has provided school supplies, books, laptops, mobile hot spots, and lots and lots of educational fun games to our emergency shelters (games provide positive ways for parents to interact with children in ways that create thinking and problem solving skills). Our shelters were most excited for the games. For some time, our district has maintained mobile hot spots that could be checked out for online learning courses. Our district just expanded this."
- White River School District: "We have provided every student grade 2-12 a Chromebook for Distant Learning. We have given mobile hotspots, as well."
- Virginia Beach: "Social workers are contacting all of their families/students. We are in the process of getting wi-fi access to McKinney-Vento students who need it."
- North Thurston, WA: "Our students have 1:1 Chromebooks in secondary and hotspots at elementary. We are putting out Chromebooks and hotspots to PreK-5 students now. The powering up is tricky. All our schools have open wifi in all parking lots. The hotspots are disks for the students' Chromebooks. We were already providing them for all families that needed them, but now we have expanded to provide them to all students who request them."
- The Community Partnership Charter School, NY: "We have purchased pre-paid phones for their students in transitional housing and find that they are working well for access to digital instruction."

- Sumner School District, WA: A local church donated \$700 to our program, so we could ensure that all McKinney-Vento eligible students had insurance on their Chromebooks...should they get lost, damaged or stolen.
- Central Valley School District, WA: Is FedEx-ing Chromebooks to students who are enrolled in the district but had to move out of the area due to loss of housing, so they can remain enrolled and advance academically. They students expect to return to the area.

2. Can you recommend a short tip sheet on cybersecurity, with our students doing virtual classes, and knowing that youth experiencing homelessness are at disproportionate and grave risk of trafficking?

Yes, there is a short [tip sheet for youth, parents, and school personnel](#) available from the Readiness and Emergency Management for Schools Technical Assistance Center.

3. Are there waivers or exceptions for standardized testing, graduation and grades?

On March 20, 2020, the US Department of Education [announced](#) that it would not enforce federal standardized testing requirements for K-12 schools. The Department also will consider waivers of [accountability](#) determinations and chronic absenteeism measures and consequences.

In Florida:

- All remaining assessments for school readiness, voluntary prekindergarten and K-12 assessments are cancelled for the 2019-2020 school year.
- Requirements for graduation and promotion, and final course grades will be evaluated as though those assessments which were cancelled did not exist.

Young Children Birth to Six

1. Is there any guidance available for child care programs that are still open?

Yes. The CDC has released [supplemental guidance](#) for child care programs. The CDC also issued a [Child Care Reopening Decision Tool](#). Also, the Alliance for Early Success has a state-by-state guide to [Child Care Subsidy and Payment Changes](#) in Response to COVID-19.

2. Is there any particular guidance for Head Start programs?

Yes. Head Start and Early Head Start programs should refer to their [General Disaster Recovery Flexibilities Information Memorandum](#).

3. What are schools doing to support children who are too young to be enrolled in K-12 school?

SchoolHouse Connection has a [checklist of five strategies](#) for young children experiencing homelessness during (and after) the COVID-19 crisis. In NC, some districts have developed "educational kits" to support the needs of young children birth to five years old who are not in an early learning program to help parents experiencing homelessness. The plan is to provide the kits every other week to families at food distribution sites or deliveries. The kits include age appropriate workbooks, educational toys or projects with the supplies to complete the project, a resource list from PBS and a communications resource list.

Housing

1. How are school districts providing temporary housing to students?

- Mesa Public Schools, AZ has a partnership with a local agency (Community Bridges). They have access to motel vouchers. They are prepared to take new referrals from our McKinney-Vento families if needed.
- Hernando Public Schools, FL: "We are collaborating with shelters to assist with emergency shelter."
- The City of San Antonio will not evict anyone, and utilities will not be shut off.
- WA state has a moratorium on rental evictions, motel evictions, campground evictions, and transitional housing evictions..
- Sumner School District, WA: We were able to keep two families sheltered in motels for two weeks through outside agency support and private donors.

2. Is there a sustainable framework being developed to help homeless youth and families shelter in place to keep them safe? Is there additional funding for shelter or housing?

FEMA has funding available for "hotels, motels, dormitories, or other forms of non-congregate sheltering." FEMA [Regional Coordinators](#) can provide a template funding request letter that applicants can use. In addition, Template Project Worksheets are currently being developed. FEMA [State Hazard Mitigation Assistance administrators](#) also have information available. FEMA's March 31, 2020 [FAQ](#) on these funds provides some guidance.

On Friday, March 27, the president signed the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), H.R. 748. This \$2 trillion package includes a wide range of funding and policy

measures to respond to the coronavirus outbreak, including emergency shelter and homeless assistance funds:

- \$25 million for Runaway and Homeless Youth Act grants to supplement existing funds, without matching requirements. Find RHYA grantees [here](#).
- \$4 billion for Emergency Solutions Grants (ESG).
 - Up to \$2 billion of these funds must be distributed to 2020 grantees under the FY2020 formula; allocations must be made within 30 days.
 - Remaining funds must be allocated to states or local units of government by a formula determined by the Secretary; these allocations must be made within 90 days.
 - Individuals considered to be at “at risk of homelessness” are eligible for prevention activities funded under ESG. This includes children and youth identified as homeless by schools and school districts.

On April 2, the U.S. Department of Housing and Urban Development (HUD) announced the release of \$1 billion in ESG funds to [current HUD grantees](#). These funds can be used for motel/hotels, emergency shelter, and services. While HUD’s definition of homeless excludes the vast majority of homeless children and youth served by schools, the CARES Act ESG funds can be used to serve families and youth HUD considers to be “at risk” of homelessness, which includes all children and youth defined as homeless under education law. To access these ESG funds for families and youth, liaisons need to contact the [entity that received funds locally](#) and attempt to access the resources.

3. Are you aware of any schools / districts / states that have implemented (or plan to implement) a program to use schools as overnight shelters for students / families experiencing homelessness, particularly as we’re likely to see more unsheltered people once eviction moratoriums expire?

So far, the only example of using schools as shelters that has come to our attention, post-COVID-19, is in [San Antonio](#), where a school was used to shelter homeless single adults, not families. Pre-COVID, there was [a school in San Francisco](#) that was being used to shelter families experiencing homelessness, and [Los Angeles](#) was exploring the idea. But we haven’t heard of any developments in the wake of COVID-19.

4. Are there any protections from evictions from apartments or motels at this time?

We have not seen national hotel eviction protections yet. We have heard reports of some local governments, such as Clark County, NV, putting such protections in place. Some state

landlord/tenant laws do cover motels that are being used as long-term residences (maybe 90 days or more). But this varies greatly and depends on state laws and even local ordinances, so you would need to check locally.

Washington state just extended its eviction moratorium to cover hotels/motels, Airbnb rentals, public campgrounds, and other transitional housing. When the moratorium eventually is lifted, landlords will not be allowed to turn unpaid rent into enforceable debt, unless they offer a reasonable payment plan, and the tenant fails to comply with that plan.

There are limited national protections from evictions from apartments. The CARES Act provides that eligible landlords who receive forbearance of their mortgage payments on rental properties (available for 90 days) cannot evict renters or charge late fees or penalties for nonpayment of rent. Also, federally-backed mortgages cannot be put in foreclosure until at least May 17.

Some states also have taken similar action. Eviction Lab has created a [state-by-state summary of eviction protections](#). Eviction Lab also has a policy tracker where you can select your state to [view both state and local eviction protections](#).

Some landlords who are not required to provide extra time for renters to pay the rent are offering extensions anyway, in recognition of the economic burdens of the time.

5. Are Runaway and Homeless Youth Act programs receiving additional funding, or getting waivers?

Yes and yes. Runaway and Homeless Youth Act (RHYA) programs received \$25 million in supplemental funding in the CARES Act. Our partners at the [National Network for Youth](#) are seeking much more funding in upcoming relief bills, which we support. Also, the Family and Youth Services Bureau (FYSB) issued [waivers and flexibilities](#) for some program elements on March 30. Additional updates from FYSB will be posted on the website of their technical assistance center, [RHYTTAC](#).

Mental Health

1. How are school districts supporting the mental health needs of children, youth and families?

- Florida K-12 school districts are permitted to redirect unspent 2019-2020 funds from the Safe Schools and Mental Health allocations to virtual and telephonic mental health counseling services for students who need emotional support due to COVID-19.
- Hernando County Public Schools, FL: “We are reaching out to all unaccompanied youth to ensure that we are following up on their basic and housing needs; following up with all existing McKinney-Vento students/families to do needs assessments and connect with services. We are trying to work closely with district staff to ensure we are assisting McKinney-Vento to our fullest capacity.”

2. Can you suggest resources for how to talk to children about coronavirus?

The National Association of School Psychologists has some [excellent mental health resources](#), including one for [talking with children about coronavirus](#). Our friends at Sesame Street also came out with some resources, available at <https://www.sesamestreet.org/caring>.

Special Education

1. How can districts do IEP meetings with schools closed?

It is allowable to hold IEP meetings virtually, over the phone or via video conference. For example, in Georgia, IEP and 504 meetings are continuing as scheduled through web based video meetings.

2. Doing IEP meetings virtually is great, but how can we deliver services for students that struggle with an emotional or behavioral disorder or some other disability that generally relies on in-person connection?

The Department of Education has provided some [guidance](#) on this question:

- “If an LEA continues to provide educational opportunities to the general student population during a school closure, the school must ensure that students with disabilities also have equal access to the same opportunities, including the provision of FAPE. (34 CFR §§104.4, 104.33 (Section 504) and 28 CFR §35.130 (Title II of the ADA)). SEAs, LEAs, and schools must ensure that, to the greatest extent possible, each student with a disability can be provided the special education and related services identified in the student’s IEP developed under IDEA, or a plan developed under Section 504”
- “The Department understands there may be exceptional circumstances that could affect how a particular service is provided.”
- “IEP teams may, but are not required to, include distance learning plans in a child’s IEP that could be triggered and implemented during a selective closure due to a COVID-19 outbreak. Such contingent provisions may include the provision of special education and related services at an alternate location or the provision of online or virtual instruction, instructional telephone calls, and other curriculum-based instructional activities, and may

identify which special education and related services, if any, could be provided at the child's home."

As the situation changes daily, safety for children, families, and instructional personnel must be considered. Some face-to-face services will not be able to be delivered at this time.

The [SETDA Coalition for eLearning](#) recently offered a webinar on the topic of [Supporting Students with IEPs During eLearning Days](#).

3. Are there any resources or guidance on providing special education services during COVID-19 and in the coming school year?

Yes. On June 4, 2020, from 2 to 3 p.m. ET, the Department's Office of Special Education Programs (OSEP) is hosting the [first in a series of webinars](#) focused on ready-to-use resources, tools, and practices from OSEP-funded grantees to support the educational, developmental, and social-emotional needs of infants, toddlers, children, and youth with disabilities through remote and distance learning.

Also, on June 1, the National Association of School Psychologists and the American School Counselor Association released [School Reentry Considerations for Supporting Student Social and Emotional Learning and Mental and Behavioral Health](#).

4. Is there any guidance on IDEA dispute resolution procedures in the context of COVID-19?

Yes. On June 22, the Office of Special Education Programs (OSEP), within the U.S. Department of Education's (Department) Office of Special Education and Rehabilitative Services, issued two Question and Answer (Q & A) documents on dispute resolution procedures under IDEA [Part B](#) and [Part C](#) in the current COVID-19 environment.

English Language Learners and Migrant Children

1. Has the U.S. Department of Education put out any guidance on serving English Language Learners or Migrant Children during school closures?

Yes. On May 18, 2020, the Department issued a [Fact Sheet on Providing Services to English Language Learners During the COVID-19 Outbreak](#). On May 11, the Department issued a Fact Sheet on [Addressing the Risk of COVID-19 While Serving Migratory Children](#).

2. Are there resources available in other languages to help with our outreach and identification?

Yes. SchoolHouse Connection has a [“Know Your Rights” flyer](#) available in Spanish, as well as a basic [McKinney-Vento training in Spanish](#) (Power Point file and recorded presentation, featuring a SHC Scholar). The National Center for Homeless Education has educational rights posters for [parents](#) and [youth](#) in Spanish. The McKinney-Vento program in the state of Washington offers [posters in seven other languages](#). Check with your McKinney-Vento State Coordinator to see if there are state-specific resources available in language other than English.

Higher Education

1. How are colleges helping their students access food, besides keeping their food pantry open?

- National Resource: Students, parents of students and graduates can apply for \$200 in cash assistance. Applications are accepted on a rolling basis. <https://myscholly.com/relief/>
- In New Orleans: “Local colleges are allowing any student with a University/College ID to eat on campus.”
- In Washington: “The Office of Superintendent of Public Instruction (OSPI), Department of Children, Youth and Families (DCYF), Washington Student Achievement Council (WSAC) and College Success Foundation (CSF) are checking in with our former foster care students and our unaccompanied homeless youth in college to provide information and resources re: food, financial aid, work study, etc.”
- Butte Community College in Chico and Oroville CA opened their food pantries for students to access between 9 am and 4 pm.
- University of Tennessee Chattanooga: “We are looking for homeless students, and we have services available on campus for them.”
- Georgia's EMBARK network has adapted their pantries, see [here](#).

2. Is there any federal guidance on supporting college students at this time?

The U.S. Department of Education has put out [guidance](#) for institutions of higher education. This guidance provides flexibility on financial aid, distance education, federal work study payments, and other issues, and includes a [FAQ document](#).

The [Children’s Bureau released guidance](#) to child welfare leaders calling on agencies to immediately contact all youth in or formerly in foster care who may need assistance finding or

securing housing while their college or university is closed during the COVID-19 pandemic. The letter notes that agencies should also be prepared to offer youth assistance with food, health care, and emotional support.

We encourage states and universities to do the same for students experiencing homelessness. Many McKinney-Vento liaisons are still in touch with recent graduates in college and could reach out. At institutions of higher education, student services, campus life, housing, and professors may know of students struggling with homelessness. Reviewing FAFSA data to identify unaccompanied youth who are independent students also should trigger additional outreach. Finally, those institutions that have [homeless liaisons on campus](#) are best positioned to know who their homeless students are, what they need, and how to reach them.

3. When college students lose their federal work study job due to campus closures or their job closing, can they still get paid?

Yes. The U.S. Department of Education has issued [guidance](#) stating that:

“For students enrolled and performing [federal work study (FWS)] at a campus that must close due to COVID-19, or for a FWS student who is employed by an employer that closes as a result of COVID-19, the institution may continue paying the student Federal work-study wages during that closure if it occurred after the beginning of the term, the institution is continuing to pay its other employees (including faculty and staff), and the institution continues to meet its institutional wage share requirement.”

4. Has USDA made any changes to SNAP eligibility for college students? Many college dining halls are closed, or students have had to leave campus, and they cannot meet their work requirements.

Work requirements have not been waived for college students. Right now, students are still required to work 20 hours a week in order to qualify for benefits. Several states petitioned USDA to waive the work requirement for college students, recognizing that many student are out of work. However, USDA denied those waiver requests. SHC is advocating with Congress to waive work requirements for college students.

5. Are student loans in deferral status at this time?

Yes. The U.S. Department of Education has put [all federal student loan borrowers in an administrative forbearance](#), which allows borrowers to temporarily stop making monthly loan

payments without fines or penalties. This suspension of payments will last until Sept. 30, 2020. The forbearance is automatic, but borrowers can continue to make payments if they choose.

6. Are colleges and universities receiving supplemental federal funding due to COVID-19?

Yes. The CARES Act created the Higher Education Emergency Relief Fund, providing \$14 billion to institutions of higher education, at least half of which must be used for emergency financial aid grants to students for expenses related to the disruption of campus operations due to coronavirus (including eligible expenses under a student's cost of attendance, such as food, housing, course materials, technology, health care, and child care). The emergency financial aid grants are [not taxable income](#) to the students. On April 9, the U.S. Department of Education announced the availability of over \$6 billion to institutions of higher education for emergency financial aid grants to be provided directly to students. An FAQ document regarding eligibility for and uses of this funding is available from ED, [here](#). The document notes that most students who are not U.S. citizens or legal permanent residents will not be eligible for the emergency financial aid grants. Based on the FAQ, it appears that students with Deferred Action for Childhood Arrivals (DACA) status are not eligible. A list of distribution of CARES Act higher education funding, by institution, including the minimum allocation for emergency financial aid grants, is [here](#).

7. Can the CARES Act emergency financial aid grants go to high school seniors who have filled out FAFSA?

No. The CARES Act higher education funds and emergency financial aid grants are only for college or university students.

Jobs/Unemployment/Income

1. For youth and parents who have lost hours at work, but have not been fired or laid off, can they get unemployment benefits?

Maybe. The CARES Act [increased and expanded eligibility](#) for unemployment benefits. The CARES Act provides an extra \$600 per week in emergency federal unemployment compensation through July 31, 2020, in addition to state benefits. The CARES Act also provides funding for states that want to provide benefits for workers who lose hours, but are not laid off. However, not every state provides those benefits. State-specific details are available [here](#), or by visiting your state's Department of Labor website. There often are long wait times on the phone, so filing on-line (if possible) is recommended.

A very basic Q&A on new unemployment benefits that we have found helpful is available [here](#).

2. When college students lose their federal work study job due to campus closures or their job closing, can they still get paid?

Yes. The U.S. Department of Education has issued [guidance](#) stating that:

“For students enrolled and performing [federal work study (FWS)] at a campus that must close due to COVID-19, or for a FWS student who is employed by an employer that closes as a result of COVID-19, the institution may continue paying the student Federal work-study wages during that closure if it occurred after the beginning of the term, the institution is continuing to pay its other employees (including faculty and staff), and the institution continues to meet its institutional wage share requirement.”

3. Are unaccompanied homeless youth in high school or college eligible to receive Recovery Rebate (stimulus) payments on their own behalf?

The Recovery Rebate is only available to youth who cannot not be claimed as a deduction on someone else’s tax return. The IRS will be looking at 2018 and 2019 tax returns to determine if someone was allowable as a dependent on someone else’s return. We know that many parents continue to claim unaccompanied youth as dependents, even if that is fraudulent. We also know many parents may have been caring for their children in 2018 or even early 2019, but then later, the youth became unaccompanied homeless youth. We are working on advocacy to make it express that all unaccompanied homeless youth, and all students considered independent on the FAFSA, can receive the benefit regardless of whether their parents claimed them on their taxes for 2018 or 2019. We will share updates on that advocacy as soon as they are available.

In the meantime, it's very important that unaccompanied youth file their 2019 taxes for themselves, as soon as possible-- especially if they didn't file for themselves in 2018. There is [free tax return software](#) available. Unaccompanied homeless youth with no income can complete an [online registration](#) offered by the IRS. If possible, youth should provide direct deposit information to the IRS (either on their tax return or through the online registration). Direct deposit information, of a bank account or prepaid debit card, will help them receive the funds much more quickly. It will take the IRS months to send out paper checks. We have a [fact sheet with this information](#), which we put together with our partners the National Network for Youth and Baker McKenzie.

We will be offering a webinar with some tax attorneys to explain the process and provide tips for supporting unaccompanied youth. More on that as soon as possible.

4. Are documented or undocumented immigrants eligible to receive Recovery Rebates and unemployment compensation?

Recovery Rebates are available only to individuals and children with valid Social Security numbers. Unemployment compensation is available only to people who are legally authorized to work. Workers with legal permanent residence (“green cards”), visas or other legal status that provides work authorization, such as Deferred Action for Childhood Arrivals (DACA), can be eligible for unemployment compensation.