

# Understanding Guidelines and Strategies for Using ARP-HCY Funds

Presentation for the National  
Association of the Education for  
Homeless Children and Youth

July 23, 2024



# Presenters



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## Presentation Topics

1. Overview of ARP-HCY
2. Obligation Requirements
3. Opportunity of Liquidation Extension
4. ARP-HCY Use of Funds
5. ARP-HCY Sustainability and Fiscal Resources
6. Q & A



## Opportunities & Outcomes

1. *Improve* identification of students experiencing homelessness
  - Including historically underserved students
2. *Impact* student success
  - Address urgent needs of SEH - including social, emotional, and mental health needs
  - Close academic gaps for SEH
  - Increase participation in enrichment programming
3. *Build* capacity
  - Create partnerships with community-based organizations



# ARP-HCY Timelines

## Liquidation and Obligation Requirements

Program	Obligation Deadline	Liquidation Deadline (Statutory 120 days)	Liquidation Extension Deadline (Up to 14-months)
ARP-HCY	September 30, 2024	January 28, 2025	March 28, 2026

- Resources:
  - [Fiscal Information](#)
  - [ARP-HCY Liquidation Extension SEA Request Template](#)
  - [Technical FAQs for ARP-HCY Liquidation Extension](#)



# Liquidation and Obligation Requirements

## What does it mean to “obligate” funds?

The regulations at [34 C.F.R. § 76.707](#) govern when an obligation of Federal funds by a State or subgrantee such as an LEA occurs. Specifically, for the purchase of products or services provided through a contract, the obligation is made on the date that the State or subgrantee makes a binding written commitment to obtain the services, work, or products. For rental or lease of real or personal property, the obligation is made when the property is used.



# Obligation Requirements 34 CFR 76.707

If the obligation is for -	The obligation is made
a) Acquisition of real or personal property	On the date on which the State or subgrantee makes a binding written commitment to acquire the property.
b) Personal services by an employee of the State or subgrantee	When the services are performed.
c) Personal services by a contractor who is not an employee of the State or subgrantee	On the date on which the State or subgrantee makes a binding written commitment to obtain the services.
d) Performance of work other than personal services.	On the date on which the State or subgrantee makes a binding written commitment to obtain the work.
e) Public utility services	When the State or subgrantee receives the services
f) Travel	When the travel is taken
g) Rental of real or personal property	When the State or subgrantee uses the property
h) A pre-agreement cost that was properly approved by the Secretary under the cost principles in 2 CFR part 200, Subpart E - Cost Principles	On the first day of the grant or subgrant performance period



# Contracts During Liquidation Extension

- A Contract with an organization or agency for items or services is considered a timely obligation of funds if a binding written commitment has been signed by 9/30/24, even if the items or services will not be provided until after 9/30 (i.e., During the liquidation period.)
- Under 34 CFR 76.707(g), funds for rental of real or personal property are not obligated until the property is used so a contract with a motel prepaying for rooms, for example, would not be a timely obligation of funds.
- An SEA or LEA may contract with a CBO to provide short-term housing placement services (e.g., placement of students in hotel/motel rooms) for students experiencing homelessness. If a binding written commitment (i.e., is signed by 9/30/24), this would be a valid obligation because the contract is for the provision of services.





# ARP-HCY Uses of Funds During Liquidation Extension

- Licenses and subscriptions:
  - Provided that a contract is signed by 9/30/24, the invoice may be paid during the liquidation period, and the license or subscription may extend beyond the liquidation period
- Supplies (e.g., school and hygiene supplies, clothing, non-perishable food) and prepaid debit, store or gas cards:
  - May be used during and after the liquidation period in limited circumstances (see question E.3.d from [ESSER and GEER Use of Funds FAQs](#))



# Applying for Liquidation Extension before 9/30/24

- SEAs may apply as soon as they have all the necessary data compiled (i.e., complete, timely, and valid information for all LEA subgrantees included in the request)
- SEAs and LEAs may continue to obligate ARP-HCY funds through 9/30/24



## Allowable Activities Under EHCY or ARP-HCY

When assessing whether a proposed use of funds is allowable under the ARP-HCY program, SEAs and LEAs should consider:

1. Availability of other district and community resources
2. Statutory requirements of the McKinney-Vento Act
  - a. Purpose of EHCY/ARP-HCY (McKinney-Vento Act § 721)
  - b. Statutorily delineated uses of funds (McKinney-Vento Act § 723(d)(1-16))
  - c. Comparability (McKinney-Vento Act § 722(g)(4))
3. Allocability requirements (2 CFR § 200.405)
4. “Necessary & reasonable” requirements (2 CFR § 200.404)



## Types of Efforts ARP-HCY Can Support

Examples from the [Dear Colleague Letter issued by ED](#) include:

- Implementing transition strategies that reduce absences and dropouts by collaborating with the feeder school, hiring mentors, supporting summer bridge programs or transition year academies.
- Providing or coordinating wrap-around services.
- Providing early childhood education to children who are not otherwise enrolled in an LEA program.
- Paying for fees related to early college, dual enrollment, or career and technical education programs.
- Paying for short-term, temporary housing (including a hotel or motel) on a case-by-case basis (e.g., ensuring a student can complete a week of school before a housing change). The cost should be reasonable and necessary for the student to attend school.



## **Can LEAs Use ARP-HCY Funds for Internet Access or Devices for Use by Homeless Students?**

Yes. The Department has responded to several questions since March 2020 about using ARP and EHCY funds for internet access and IT-related devices and other equipment. Allowable uses include:

- Internet service provider start-up and monthly fees for a doubled-up household, shelter study room, etc.
- Purchase of wifi extenders, MyFi or hotspot devices, etc.
- Additional devices or equipment such as headphones or earbuds if LEAs do not provide them to all students.
- On-site support by a tutor for online classwork or homework.



## Can ARP-HCY Funds be Used to Purchase Store or Gas Cards?

- The use of gift cards, store cards, or prepaid debit cards for a parent/guardian or youth experiencing homelessness to purchase school, clothing, or hygiene supplies is allowable.
- SEAs and LEAs and Title I, Part A programs can opt not to allow these methods due to elevated concerns about fraud, waste, or abuse.
- LEAs that allow the use of prepaid debit cards should have procedures to reduce the likelihood of fraud, waste, or abuse, for example, by asking for receipts of items purchased with the gift card.
- The Department does not recommend that prepaid debit cards be the primary method for LEAs to distribute supplies to students experiencing homelessness.
- The excess cost of school of origin transportation may be defrayed by providing gas cards or mileage reimbursement to a parent/guardian or youth experiencing homelessness.



## Can ARP-HCY Funds be Used for Stakeholder Engagement?

- Yes. States and LEAs can use EHCY or ARP-HCY funds to engage stakeholders (including youth, parents, and caregivers) with lived experience of homelessness.
- Engagement with these stakeholders may take many forms, including allowing stakeholders to serve as:
  - Advisory committee members
  - Youth advisory board members (e.g., as for Youth Homelessness Demonstration grants administered by HUD).



# Title I, Part A LEA Homeless Set-aside Planning for SY 24-25

SY 24-25 Title I, Part A LEA homeless set-aside consultations should include need, outcome, and expenditure data on students experiencing homelessness from ARP-HCY funding period

- Consider liaison salaries, transportation costs, and student service needs

Achievement gap data between homeless and economically disadvantaged or all students can include:

- Achievement in reading/language arts, mathematics, and science
- Adjusted-cohort graduation rates (ACGR)
- Chronic absenteeism rates





# Long-Term ARP-HCY Sustainability Planning

**Sustainability** ensures the lasting or ongoing impact of program activities when the grant period is over, or the funds are spent. NCHE issued reports last fall on two pertinent topics:

- [A Guide to Effective Collaborations with Community-Based Organizations to Support Students Experiencing Homelessness](#)
- [Using ARP-HCY Funds for Sustainable Impact: A Guide for Education for Homeless Children and Youth Programs](#)

Please review these with SEA colleagues and LEA subgrantees.





# ARP-HCY Fiscal Resources

Cross-cutting ARP-HCY administrative and fiscal information is available at:

- [Frequently Asked ARP-HCY Questions and Answers - Office of Elementary and Secondary Education](#)
- [Resources - Office of Elementary and Secondary Education](#) (webinar slides)
- [ARP-HCY program website homepage](#) (guidance letters)
- [Fiscal Information - Office of Elementary and Secondary Education](#) (liquidation extension)



# National Center for Homeless Education Resource Overview

July 2024



# National Center for Homeless Education (NCHE)

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Housed at SERVE, University of North Carolina at Greensboro

Operates U.S. Department of Education's homeless education technical assistance & information center. NCHE has:

- Comprehensive website: <http://nche.ed.gov>
- Toll-free helpline: Call 800-308-2145 or e-mail [homeless@serve.org](mailto:homeless@serve.org)
- Information briefs & awareness materials
- Live and pre-recorded webinars
- Listserv: <https://nche.ed.gov/resources/>



# Our Team



# SERVE/NCHE Team



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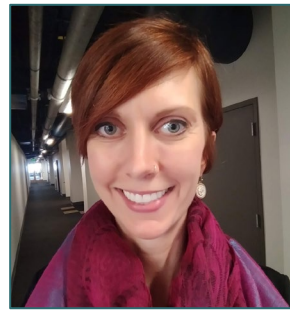
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# Goal for the Presentation

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Connect you with available resources to support the education of students experiencing homelessness

# NCHE Webinars and Videos – Live or Self-Paced

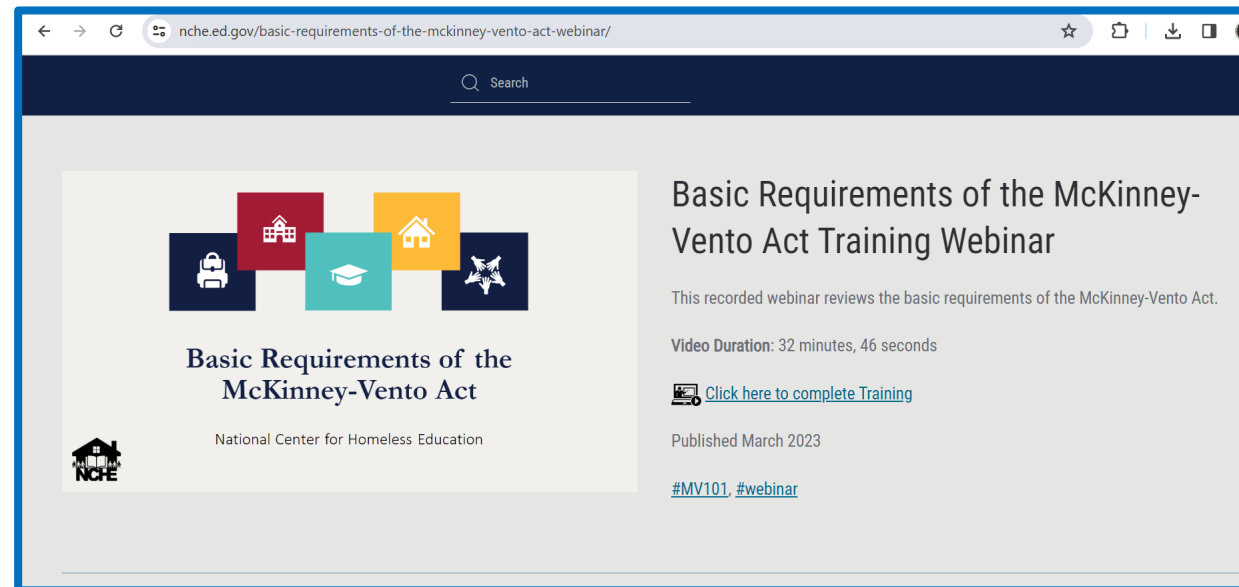
- Upcoming live webinars

- Use this link for future live webinars: <https://nche.ed.gov/group-training/>

- Self-paced recorded webinars/videos

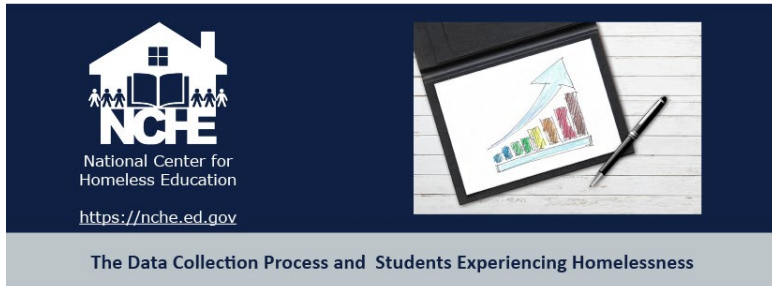
- Use this link for recorded webinars/videos: <https://nche.ed.gov/self-paced-online-training/>

- *Determining Eligibility*
    - *School Selection*
    - *Doubled-Up*
    - *Unaccompanied Homeless Youth*
    - *Paving the Way to College*





# Data-Driven Decision-Making



Each year, states are asked to meet a number of legislative requirements under the McKinney-Vento Homeless Assistance Act (McKinney-Vento Act) related to providing demographic and outcome data for students experiencing homelessness [42 U.S.C. §§ 11434(d), 11434(f), 11434(h)(1)]. Collecting data allows state coordinators and local liaisons to assess their implementation of the McKinney-Vento Act. Data also provides critical information that can be used to assess the educational development of students experiencing homelessness and design interventions that support learning. Similarly, the U.S. Department of Education (ED) uses data to determine the effectiveness of the Education for Homeless Children and Youth program and provide technical assistance to states.

The National Center for Homeless Education (NCHIE) developed a series of briefs focused on ensuring data submitted to ED meets quality standards and conforms to program requirements. As the first in the series, this brief provides an overview of the data collection process by addressing who is responsible for data collections, how and when data are reported, what to expect during the data quality review conducted by ED, and what resources and help are available. Subsequent briefs will examine common questions related to individual file specifications.

## Responsible Parties

Collecting data requires teamwork within the local educational agency (LEA), within the state educational agency (SEA), and between entities:

- Once liaisons identify students in coordination with other LEA staff members and community agencies, they must either enter relevant information into the student data system or provide the information to another staff member for entry. They also track information on the number of students served by McKinney-Vento subgrants.
- LEA data managers submit data to the SEA. They coordinate with liaisons to verify the accuracy and completeness of data and to draft data quality comments for the SEA.
- State coordinators work with SEA data managers to provide LEAs with guidance on what data to collect, when, and how to submit data. This information should be provided to liaisons in a format that they can easily share with others in their districts. They also review data and provide information for data quality notes to the ED*Facts* coordinators and submitters.<sup>1</sup>
- ED*Facts* coordinators and submitters work with state coordinators to submit data and related quality comments to ED. They also work with state coordinators to plan changes to state data systems that could

It is critical that liaisons review data prior to their submission to the SEA to ensure it accurately represents both homeless students and the LEA. Similarly, state coordinators should review all data prior to submitting information to ED*Facts* or the CSPP.

<sup>1</sup> ED*Facts* submitters may include SEA staff or contractors designated by the ED*Facts* coordinator. They extract data from the SEA's state longitudinal data system, input the information into the ESS, answer questions about the data, or address programming issues that arise during data submission or collection.

- Data supports and resources
  - *National Data Summary Briefs*
    - *Student Homelessness in America*
    - *Chronic Absenteeism Among Students Experiencing Homelessness*
    - *Graduation Rates among Students Experiencing Homelessness*
- State data maps and workbooks
- State data calls
- Data Collection Briefs



# New School Year 2022-23 Data Resources



- Stay tuned for more updates regarding updated national data on students experiencing homelessness
  - Webinar in mid-August
  - New National Summary Report this fall

# State Coordinators' Handbook



## State Coordinators' Handbook

National Center for Homeless Education

Revised September 2023  
Originally Published 2010

Produced by  
The SERVE Center at the University of  
North Carolina at Greensboro



## Main Sections

- Overview of roles
- Foundations for your work
- Key responsibilities
- Managing the work



# Elevating Lived Expertise

- Elevating voices with lived expertise webinar
- Voices Amplified Series
  - Supporting LGBTQ+ Students Experiencing Homelessness
  - Supporting Pregnant, Parenting, and Caregiving Students Experiencing Homelessness
  - Black Students Experiencing Homelessness



## Voices Amplified Podcast

Voices Amplified is a special four-part NCHÉ series. These listening sessions are meant to elevate the McKinney-Vento Act, partners in the field working with families, children and youth experiencing homelessness, provide insights, challenges, experiences, as well as opportunities for learning, growth, and partnership in the field. The first in the series is a "foundation setting" session, while the remainder of the listening sessions build on this foundation to highlight particular student populations experiencing homelessness including LGBTQI+ students, Black students as well as pregnant, parenting and/or caregiving students who are experiencing homelessness.

Published December 2023

- ▶ [Episode 1](#)
- ▶ [Episode 2](#)
- ▶ [Episode 3](#)
- ▶ [Episode 4](#)

# Resources to Support Equity



Viewing Your McKinney-Vento Homeless Education Program Through an Equity Lens



National Center for Homeless Edu...  
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- **Training:** *Viewing Your McKinney-Vento Homeless Education Program Through an Equity Lens*
  - <https://youtu.be/EX9nXqJsPZU?si=T6U9z6MUminxL5il>
- **Brief:** *Improving Equity in and Access to Quality CTE Programs for Students Experiencing Homelessness*
- **Resource Page:**  
<https://nche.ed.gov/equity/>



# Resources for Local Liaisons – Local Liaison Toolkit

## Homeless Liaison Toolkit | 2020 Edition

- Identification
- Eligibility
- Enrollment
- School Selection
- Transportation
- Dispute Resolution
- Working With Parents
- Data Collection



# Local Liaison Professional Learning Tip Sheets

## Topics for All School Personnel

1. <a href="#">Warning Signs of Homelessness</a>	4. <a href="#">McKinney-Vento Act Considerations and Supports for UHY</a>	7. <a href="#">Special Education</a>
2. <a href="#">McKinney-Vento Act Definition of Homeless and Unaccompanied Homeless Youth (UHY)</a>	5. <a href="#">Dispute Resolutions</a>	8. <a href="#">Trauma-Informed Care/Specific Services</a>
3. <a href="#">Determining Eligibility for McKinney-Vento Rights and Services</a>	6. <a href="#">Family Educational Rights and Privacy Act (FERPA)</a>	

- Contain links to topics for all school personnel and for specific audiences

## Topics for Specific Audiences

Target Audience	Suggested Topics & NCHE Resources	Considerations
<b>Data Managers &amp; Enrollment Staff</b>	<p><b>Suggested Topics</b> Enrollment procedures – district-wide protocol</p> <p><b>NCHE Resources</b> Homeless Liaison Toolkit, <a href="#">Chapter Fifteen: Managing the Work</a></p>	<ul style="list-style-type: none"> <li>• Establish a district-wide protocol for the identification and enrollment of eligible students, allowing for more standardized trainings and consistent implementation.</li> <li>• Utilize a housing questionnaire to incorporate non-invasive details about a student’s living arrangement as part of your district-wide protocol.</li> </ul>
<b>Transportation &amp; Nutrition Staff</b>	<p><b>Suggested Topics</b> Transporting children and youth experiencing homelessness</p>	<ul style="list-style-type: none"> <li>• Establish procedures to arrange school transportation and access to free/reduced-priced school meals – include procedures in</li> </ul>

- References considerations for each target audience to support the planning of professional learning



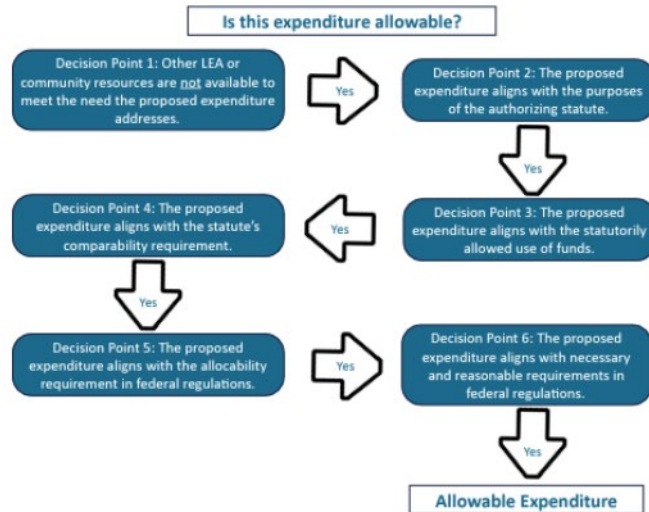
# Resources for Funding and ARP-HCY

National Center for Homeless Education  
Supporting the Education of Children and  
Youth Experiencing Homelessness  
<https://nche.ed.gov>



## Use of Funds Tip Sheet for Serving Children and Youth Experiencing Homelessness with McKinney-Vento and the American Rescue Plan

This NCHE tip sheet provides educational administrators in local educational agencies (LEAs) with information and guiding questions to assist them in determining how to spend subgrant funds in their Education for Homeless Children and Youth (EHCY) program authorized by Subtitle VII-B of the McKinney-Vento Homeless Assistance Act (McKinney-Vento Act). The tip sheet also applies to subgrants distributed from American Rescue Plan-Homeless Children and Youth (ARP-HCY) funds.<sup>1</sup> LEA subgrantees should consider the following six decision points in the order in which they are listed when making funding decisions. A proposed expenditure must meet the requirements in each of these decision points to be allowable.



- Use of Funds Tip Sheet
- Making Use of Funds: Key Decision Points (Video)
- Other ARP-HCY resources: <https://nche.ed.gov/arp-hcy/>

<sup>1</sup> View the full statute of the American Rescue Plan Act of 2021: <https://www.congress.gov/117/bills/hr/1319/BILLS-117hr1319enr.pdf>. For additional information on the ARP-HCY program, view the ED ARP-HCY program web page: <https://oese.ed.gov/offices/american-rescue-plan/american-rescue-plan-elementary-secondary-school-emergency-relief-homeless-children-youth-arp-hcy/>. Also, view the ARP-HCY resources page of the National Center for Homeless Education: <https://nche.ed.gov/legislation/arp/>.





# Other Topical Resources Available from NCHE

## NCHE Topics Page

<https://nche.ed.gov/topics/>

### A-D

[American Rescue Plan Elementary and Secondary School Emergency](#)

[Relief – Homeless Children and Youth \(ARP-HCY\)](#)

[Best Interest and School Selection](#)

[Charter Schools](#)

[Children of Incarcerated Parents \(COIP\) | Incarceration](#)

[COVID-19 \(Coronavirus\)](#)

[Credit Accrual](#)

[Chronic Absence](#)

[Collaboration](#)

[Curricula: Educating Students and Others About Homelessness](#)

[Data and Statistics on Homelessness](#)

[Data Collection](#)

[Determining Eligibility for McKinney-Vento Rights and Services](#)

[Disaster Preparation and Response](#)

[Dispute Resolution](#)

[Domestic Violence](#)

## Recent Specialized Topic Areas

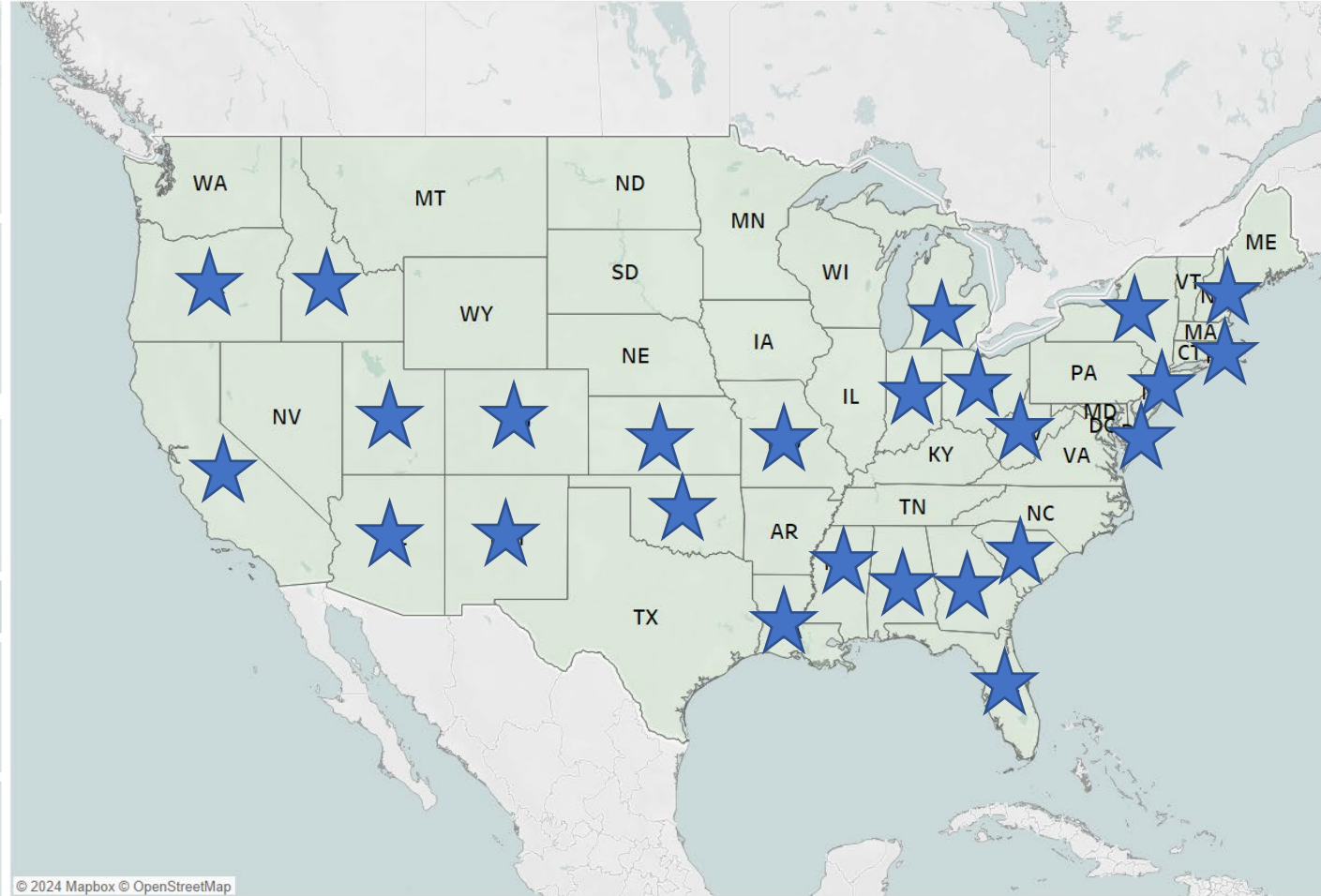
- Early Childhood
- High School Completion, Career-Technical Education & Postsecondary Transitions
- Disaster Response
- Newcomer & Refugee Students



# Customized Technical Assistance: Intensive TA Engagements Over the Past Two Years

## Topics included:

- General support for State Coordinators
- Support with data analysis and utilization
- Professional learning for local liaisons
- Understanding the McKinney-Vento Act and other applicable laws
- Assistance with subgrant processes
- Presentations to policymakers and interagency partners
- Strategic planning
- Program development, assessment, and improvement



# Additional Opportunities for TA

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**Support at the state and local levels:**



**Professional Learning**



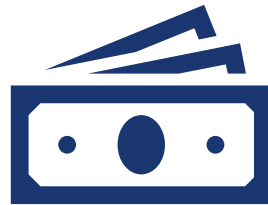
**Data-Driven Decision Making**



**Communities of Practice**



**Policy/Program Development**



**Grant Management**



**One-on-One Consultation**

# Contact Us!

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Comprehensive resource website for the ED TA Center: <https://nche.ed.gov>

Listserv: <https://nche.ed.gov/resources/>

Helpline email: [homeless@serve.org](mailto:homeless@serve.org)



Requests for additional support from our team: [info@serve.org](mailto:info@serve.org)





QUESTIONS





## Contact Us

- EHCY Program Office
  - [homeless@ed.gov](mailto:homeless@ed.gov)
- NCHE Helpline
  - [homeless@serve.org](mailto:homeless@serve.org)





**Thank You**

