



American Rescue Plan - Homeless Children and Youth II Entitlement Grant

Responsibilities and Resources for Consortia

This document is available from:

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May 2022

Introduction to ARP Homeless II – Entitlement Grant

The American Rescue Plan Act (ARP), Congress' most recent package for COVID-19 relief, provided Arizona with a total allocation of \$16,914,124 for ARP Homeless Children and Youth (ARP-HYC) funds, with \$9,520,398 set aside for grant allocation for the ARP Homeless II. This set-aside funding is referred to as the ARP Homeless II – Entitlement funds.

ADE will distribute the \$9,520.398 in ARP Homeless II – Entitlement funds to all eligible Local Education Agencies (LEAs). Allocations were determined by a formula set forth by the United States Department of Education (USDE) based equally on the proportional share of an LEA's allocation under Title I-A for 2020-21, and the LEA's proportional share of the number of homeless children and youth identified by each LEA relative to all LEAs in the State, using the greater of the [certified number of homeless children and youth in either the 2018-19 or 2019-20 school year for each LEA](#).

Due to the extraordinary impact of the pandemic, children and youth experiencing homelessness have specific and urgent needs, especially in accessing consistent and equitable educational opportunities, and social, emotional, and mental health supports. These needs, which have been amplified by the pandemic, can be attributed to barriers that have impacted identification and school enrollment, consistent classroom instruction, and the navigation of services for shelter/housing, clothing and school supplies, food, and childcare. Accordingly, the ARP Homeless II – Entitlement funds are specifically dedicated to support the identification, enrollment, retention, and educational success of children and youth experiencing homelessness.

Introduction to ARP Homeless II – Entitlement Consortia

According to the American Rescue Plan Act, an LEA must have a minimum allocation of \$5,000 to receive an ARP Homeless II – Entitlement subgrant. LEAs with an allocation less than \$5,000 may receive a subgrant only as part of a consortium. Consortia are eligible to receive a subgrant if the total of their combined allocations is at least \$5,000. For the purpose of this grant, a consortium means a subgrantee that consists of more than one LEA. ([86 FR 36222](#))

All LEAs who received a preliminary allocation of less than \$5,000 are encouraged to join a consortium to receive funds rather than return the funds to ADE. Each consortium must designate a member to serve as the consortium leader.

- There is no limit to the number of LEAs that can join a consortium.
- There is no limit to the number of consortia that receive subgrants.
- Each consortium must have a combined allocation of at least \$5,000 among all participating LEAs.

The following contains information on the responsibilities of a consortium leader and of consortium members.

Responsibilities of the Consortium Leader

The consortium leader is responsible for acting as the fiscal agent for the consortium and ensuring all requirements are met. Responsibilities of the fiscal agent include:

- Co-creating a plan for how funds will be used or distributed, including any services to be provided to consortium members that meet the needs of students experiencing homelessness in all member LEAs (see [Conducting a Needs Assessment section](#) for more information).
- Developing and collecting Memoranda of Understanding (MOU)/agreements signed by all consortium member LEAs that reflect the needs of students and plan for the use of funds.
- Completing the ARP Homeless II – Entitlement application and budget in Grants Management Enterprise (GME).
- Managing the budget and submitting claims in GME.
- Completing all reports required by ADE.

Consortium leaders may reserve a reasonable and necessary amount of combined consortium funds to cover costs relating to direct administration activities (such as staff time to submit applications, claims and reports). Consortium leaders may also charge an indirect cost rate to the grant. All consortium members should come to an agreement about administration costs before agreements are signed and grant funds are surrendered to the consortium leader.

Responsibilities of a Consortium Member

An LEA choosing to join a consortium to receive ARP Homeless II – Entitlement funds will select an LEA or ESA to manage their funds when the grant application is available in GME. By joining a consortium, the LEA is electing to transfer the management of their ARP Homeless II – Entitlement allocation to the consortium leader.

Consortium members will engage with the consortium leader to co-create a plan for how funds will be used to support the unique needs of students experiencing homelessness in their LEAs. All consortium members should come to a collective agreement about the use of funds and services provided before the LEA elects to transfer fund management to the consortium leader. The consortium leader and all consortium members will complete a memorandum of understanding (MOU) that reflects this plan. ADE does not require a specific MOU form but has provided a [sample MOU for consortium leaders](#). To this end, please ensure that the content of the MOU reflects the fiscal agreements, whether to pool funds to provide services to all participating consortium members or if each consortium member will receive their proportional share of the original ARP-HCY II funds. Additionally, each consortium member will need to sign the [FY22 ARP Homeless II Consortium Member Assurances](#). Both the MOU and the FY22 ARP Homeless II Consortium Member Assurances will need to be uploaded into GME by the consortium leader.

Conducting a Needs Assessment

It is important that all parties in a consortium come to an agreement on how the consortium grant will best support students experiencing homelessness in their LEAs. To facilitate this, consortia are encouraged to conduct needs assessments to determine the specific needs of the students experiencing homelessness in their member LEAs.

Needs assessments typically involve a process of reviewing stakeholder input, data and systems to determine areas of improvement related to the target population. As part of the needs

assessment, applicants are encouraged to review data from their local Student Information Systems (SIS) and enrollment/in-take documents. Data points to consider are the number of children and youth enrolled as homeless, academic benchmark assessment data, graduation rates, attendance rates, absenteeism rates, and dropout rates.

Needs assessments may also include looking at the Title I-A homeless reservation and getting assistance from district business managers to determine the amount of local funds used in a typical year to support students experiencing homelessness and the services or items on which those funds are spent.

Data is not the only important piece of a needs assessment. There may be emerging needs in LEAs due to the COVID-19 pandemic that will not be reflected in the data. It is crucial to engage homeless liaisons and other LEA staff working with students experiencing homelessness to determine the immediate needs present for students.

If an LEA or consortium wishes to conduct an informal needs assessment, the National Center for Homeless Education has an informal LEA Needs Assessment process that may be useful:
<https://nche.ed.gov/wp-content/uploads/2018/10/lea-needs-assess.docx>

Allowable Use of Funds

Overall, all costs must be deemed “reasonable and necessary” and align with the purpose and other requirements in the McKinney-Vento Homeless Assistance Act. Consortia should consider the extraordinary impact of the pandemic on students experiencing homelessness when making decisions about how to use funds.

The 16 activities authorized under the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11433(d)) are listed below:

- (1) The provision of tutoring, supplemental instruction, and enriched educational services that are linked to the achievement of the same challenging state academic standards as the state establishes for other children and youths.
- (2) The provision of expedited evaluations of the strengths and needs of homeless children and youths, including needs and eligibility for programs and services (such as educational programs for gifted and talented students, children with disabilities, and English learners, services provided under Title I of the Elementary and Secondary Education Act of 1965 or similar state or local programs, programs in career and technical education, and school nutrition programs).
- (3) Professional development and other activities for educators and specialized instructional support personnel that are designed to heighten the understanding and sensitivity of such personnel to the needs of homeless children and youths, the rights of such children and youths under this subtitle, and the specific educational needs of runaway and homeless youths.
- (4) The provision of referral services to homeless children and youths for medical, dental, mental, and other health services.
- (5) The provision of assistance to defray the excess cost of transportation for students under section 20 USC. sec. 722(g)(4)(A), not otherwise provided through federal, state, or local funding, where necessary to enable students to attend the school selected under section 20 USC. 722(g)(3).

- (6) The provision of developmentally appropriate early childhood education programs, not otherwise provided through federal, state, or local funding, for preschool-aged homeless children.
- (7) The provision of services and assistance to attract, engage, and retain homeless children and youths, particularly homeless children and youths who are not enrolled in school, in public school programs and services provided to non-homeless children and youths.
- (8) The provision for homeless children and youths of before- and after-school, mentoring, and summer programs in which a teacher or other qualified individual provides tutoring, homework assistance, and supervision of educational activities.
- (9) If necessary, the payment of fees and other costs associated with tracking, obtaining, and transferring records necessary to enroll homeless children and youths in school, including birth certificates, immunization or other required health records, academic records, guardianship records, and evaluations for special programs or services.]
- (10) The provision of education and training to the parents and guardians of homeless children and youths about the rights of, and resources available to, such children and youths, and other activities designed to increase the meaningful involvement of parents and guardians of homeless children and youths in the education of such children and youths.
- (11) The development of coordination between schools and agencies providing services to homeless children and youths, as described in section 722(g)(5) of the McKinney-Vento Act.
- (12) The provision of specialized instructional support services (including violence prevention counseling) and referrals for such services.
- (13) Activities to address the particular needs of homeless children and youths that may arise from domestic violence and parental mental health or substance abuse problems.
- (14) The adaptation of space and purchase of supplies for any non-school facilities made available under section 723(a)(2) of the McKinney-Vento Act to provide services under section 723(d) of the McKinney-Vento Act.
- (15) The provision of school supplies, including those supplies to be distributed at shelters or temporary housing facilities, or other appropriate locations.
- (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.

Activities under ARP Homeless II – Entitlement may include any expenses necessary to facilitate the identification, enrollment, retention, or educational success of homeless children and youth to enable homeless children and youth to attend school and participate fully in school activities, such as:

- providing wraparound services (which could be provided in collaboration with and/or through contracts with community-based organizations, and could include academic supports, trauma-informed care, social-emotional support, and mental health services);
- purchasing needed supplies (e.g., personal protective equipment, eyeglasses, school

supplies, personal care items);

- providing transportation to enable homeless children and youth to attend school and participate fully in school activities;
- purchasing cell phones or other technological devices for unaccompanied, homeless children and youth to enable such children and youth to attend school and fully participate in school activities;
- providing access to reliable, high-speed internet for students through the purchase of internet-connected devices/equipment, mobile hotspots, wireless service plans, or installation of Community Wi-Fi Hotspots (e.g., at homeless shelters), especially in underserved communities;
- paying for short-term, temporary housing (e.g., a few days in a motel) when such emergency housing is the only reasonable option for COVID-safe temporary housing and when necessary to enable homeless children and youth to attend school and participate fully in school activities (including summer school); and
- providing store cards/prepaid debit cards to purchase materials necessary for students to participate fully in school activities.

Accordingly, suggestions for using ARP Homeless II – Entitlement funds to support students experiencing homelessness include:

- increasing outreach and identification by adding additional staff;
- enhancing communication options with students and families;
- increasing counseling and social work services;
- facilitating the enrollment and retention of students experiencing homelessness;
- hiring “systems navigators” to help families and youth access education;
- contracting with community-based organizations to provide services to students and assistance to districts in specific regions;
- providing academic coaching, in-person enrichment opportunities, and access to summer learning;
- offering early childhood education services for young children experiencing homelessness;
- making systems and processes more McKinney-Vento friendly;
- helping meet rising mental health needs;
- providing more and better transportation options; and
- providing homeless children and youth with wrap-around services to address the challenges of COVID-19.

Sample Memorandum of Understanding (MOU)

*This is a sample only. Consortium leaders should ensure MOUs follow their agency's policy and procedures. Content of MOUs should be reviewed by the agency's business manager, administrator, or legal counsel as appropriate to ensure that all fiscal agreements between the consortium lead and each participating LEA consortium member is accurate.

[Click here to open a blank, editable version of the sample MOU](#)