



**AMERICAN RESCUE PLAN – EDUCATION FOR HOMELESS CHILDREN AND YOUTH
PART A: APPLICATION COVER SHEET
(CFDA 84.425W)**

<p>Legal Name (State Educational Agency):</p> <p>Tennessee Department of Education</p>	<p>DUNS Number:</p> <p>_879016251_ _ _ _ _</p>
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<p>To the best of my knowledge and belief, all of the information and data in this application are true and correct. I acknowledge and agree that the failure to comply with all Assurances and Certifications in this application or any applicable law or regulation may result in liability under the False Claims Act, 31 U.S.C. § 3729, et seq.; OMB Guidelines to Agencies on Governmentwide Debarment and Suspension (Nonprocurement) in 2 CFR part 180, as adopted and amended as regulations of the Department in 2 CFR part 3485; and 18 U.S.C. § 1001, as appropriate.</p>	

For ARP Homeless I:

- 1. How the SEA has used or will use up to 25 percent of funds awarded under ARP Homeless I for State-level activities to provide training, technical assistance, capacity-building, and engagement at the State and LEA levels, including support to LEAs to increase access to summer programming in 2021. This must include how the SEA has supported LEAs to plan for and provide wrap-around services, in collaboration with State and local agencies for**

immediate needs this spring 2021, and how it will support LEAs for school year 2021-2022. This should include the extent to which the SEA has or plans to build capacity in LEAs that have not received an EHCY subgrant in the past in order to ensure that these LEAs are well-prepared to utilize the funds provided in ARP Homeless II.

The SEA made 75 percent of ARP Homeless I funding available to the Tennessee's 24 current McKinney-Vento Grant subgrantees through a competitive grant. Twenty of those LEAs applied for and were awarded ARP Homeless I funds on July 2, 2021. Because ARP Homeless funds were not made available to the state until the spring of 2021, helping LEAs address immediate needs with these particular funds was challenging. As planning for ARP Homeless was underway, support was provided through the nearly 1.3 billion dollars allocated to LEAs through ESSER 1.0 and ESSER 2.0. LEAs across the state utilized ESSER funds to provide needed services through the spring and summer of 2021. Further, the SEA has worked diligently since the pandemic began to support LEAs in continually assessing and identifying the needs of their students resulting from the pandemic. In March of 2020, the Commissioner began tri-weekly calls with Tennessee superintendents to disseminate information in real time, which was especially beneficial given how quickly the information was changing. Each week, TDOE hosted officials from partner agencies (Tennessee Department of Health, TSSAA, Department of Health and Human Services, TEMA) to address available supports and services. Further, Q&A lines were made open for direct inquiries on topics at hand or for future planning. Slide decks, notes, and email blasts followed these engagement calls to collect the information for relevant parties to review and address. In addition, regular office hours were hosted by TDOE to support districts on the allowable use of the CARES Act relief funding designed to address the immediate needs of students, families, teachers, and districts. These office hours allowed TDOE staff to provide and tailored support for districts.

Additionally, partially funded through ARP Homeless I state funds, the SEA's McKinney-Vento Grant Manager provided and continues to provide ongoing guidance and support to Tennessee's LEAs. Supports include a webinar on the ARP Homeless I application and a technical application guide to assist LEAs with the ARP Homeless I program and application. These resources provided information on the allowable use of funds, spending priorities (including wrap-around services and summer programming), spending plan requirements, budget expectations, and fiscal considerations. All ARP Homeless resources were posted for LEA and public view in ePlan (the SEA's grant management system). Updates and guidance were also provided in the monthly Federal Programs Update newsletter as well as the weekly Commissioner's Update for Directors. Additionally, the McKinney-Vento Grant Manager sends out frequent reminders and updates pertaining to ARP Homeless to LEAs via email and provides ongoing, on-demand technical assistance to LEAs via both phone and email. Wrap-around services and summer programming were covered and discussed in detail during the ARP Homeless I webinar and associated guidance. Emphasis was placed on evaluation of student needs and developing plans and budgets addressing the need for support services.

In preparation of ARP Homeless II, the state ensured that all LEAs had access to the information provided on ARP Homeless I and provided additional resources from organizations such as the National Center for Homeless Education (NCHE) and Schoolhouse Connections around the allowable use of funds and program priorities. Additionally, the McKinney-Vento Grant Manager discussed ARP Homeless and gathered feedback from the SEA's McKinney-Vento Committee of Practitioners (CoP). Members of the CoP, including LEAs who are not McKinney-Vento subgrantees, were asked to provide feedback on the design of the program and the types of support they need. Because ARP Homeless II is available to all LEAs, additional supports have been and will be put in place for LEAs who are not as familiar with McKinney-Vento. These include regular office hours during the application window and beyond, more in-depth guidance around the allowable use of funds, and quarterly professional development and collaboration sessions.

Additionally, the following state activities are in development:

- The SEA is currently in the process of procuring two part-time contractors to assist with ARP Homeless programming. These contractors are retired McKinney-Vento homeless liaisons from various areas of the state. The contractors will help with the development of professional development, technical assistance, and other program requirements.*
- The SEA will host an annual statewide McKinney-Vento & ARP Homeless Conference in 2022 and beyond (dates TBD). The conference will be in the middle of the state, so all LEAs have equal access to attend.*
- The McKinney-Vento Grant Manager will provide quarterly webinars for ARP Homeless grantees. Webinars will be focused on a specific topic, including wrap-around services. A session focused specifically on working with community-based organizations was provided in November 2021.*
- The McKinney-Vento Grant Manager will hold monthly office hours for ARP Homeless grantees or any homeless liaison to offer support and opportunities for collaboration.*
- The SEA will either subcontract with an organization or utilize the SEA's internal resources to develop a McKinney-Vento data dashboard. The dashboard will allow LEAs to view all their homeless student data in one location and will contain information covering both academics and support services. Having greater access to in-depth data will allow LEAs to better identify and address barriers and gaps in wrap-around services and other programming.*
- The SEA is developing a competitive grant for LEAs to receive funds to subcontract with a qualified and experienced CBO to develop a system navigator to assist students and families in transition with wrap-around and other services.*

2. How the SEA has used or will use their funds for State-level activities to provide support to LEAs to increase access to summer programming and plan for and provide wrap-around services for summer 2021, in collaboration with State and local agencies and other community-based organizations.

ARP Homeless I funds were awarded to LEAs on July 2, 2021 and LEAs had until Aug. 2, 2021 to budget their funds. Because 2021 summer programming was required by Tennessee state law, LEAs had already developed, and in some cases, implemented summer programming by the time ARP Homeless I was awarded. LEAs had access to funds from both ESSER I and ESSER II, along with other funds provided to LEAs by the state to implement summer programming, and the McKinney-Vento subgrant (as applicable). ARP Homeless state funds are partly utilized to fund the McKinney-Vento Grant Manager who was able to provide information on summer programming and wrap-around services through webinars, guidance documents, and technical assistance to LEAs.

3. How the SEA has used or will use at least 75 percent of funds awarded under ARP Homeless I for distribution to LEAs in accordance with all requirements of EHCY. This must include the extent to which the SEA has or will use funds to supplement existing EHCY subgrants to allow for more rapid fund distribution to address the needs of students experiencing homelessness, and the extent to which the SEA analyzed and reviewed where there are significant concentrations of students and families experiencing homelessness across the State (including in LEAs that are not existing EHCY subgrantees), and how it has or will ensure that supports from ARP Homeless I can urgently reach them.

Based on ED's recommendations to distribute funds quickly, the SEA awarded 75 percent of the state's ARP Homeless I allocation through a competitive grant for current McKinney-Vento subgrantees. Twenty out of 24 subgrantees applied for and were awarded funds on July 2, 2021. In planning for the allocation of ARP Homeless I, the SEA explored several options for the distribution of funds, including:

- Distributing funds only to existing McKinney-Vento subgrantees*
- Distributing funds to LEAs with the highest concentrations of students and families experiencing homelessness*
- Distributing funds to both existing McKinney-Vento subgrantees and LEAs who do not receive a subgrant but have a high number of students and families experiencing homelessness*

In order to determine how APR Homeless, I might have the grantees impact, the SEA analyzed the state's homeless data to determine where there are significant concentrations of students and families experiencing homelessness across the state. In the SEA's data review, it became apparent that many of the state's McKinney-Vento subgrantees are also the LEAs with the highest concentration of students and families experiencing homelessness. Therefore, the SEA concluded that distributing ARP Homeless I funds to existing McKinney-Vento subgrantees was the best and most efficient way to provide support to students most in need as quickly as possible.

The ARP Homeless I application and application process were designed to ensure that all EHCY requirements are met. This was achieved through the application questions, budget pages, associated assurances, and a two-level SEA application review process. LEA awards for ARP Homeless I am funding were based on LEA need, the number of homeless students served, and the quality of the LEA's spending and programming plan. Opening ARP Homeless I funds to current subgrantees who were already familiar with the requirements McKinney-Vento requirements and who already serve a large proportion of the SEA's students in transition, allowed the SEA to distribute funds according to ED's recommendations – quickly and with an emphasis on some of the greatest areas of need.

For ARP Homeless II:

- 1. How the SEA will use up to 25 percent of funds awarded under ARP Homeless II for State-level activities to provide training, technical assistance, capacity-building, and engagement at the State and LEA levels, including support to LEAs to plan for and provide wrap-around services, in collaboration with State and local agencies, for school year 2021-2022.**

Partially funded through ARP Homeless I SEA funds, the state's McKinney-Vento Grant Manager provided and continues to provide on-going guidance and support to Tennessee LEAs. Supports include a webinar on the ARP Homeless II application and a technical application guide to assist LEAs with the ARP Homeless II program and application. These resources provided information on the allowable use of funds, spending priorities (including wrap-around services), spending plan requirements, budget expectations, and fiscal considerations. More specifically, wrap-around services were covered and discussed in detail during the ARP Homeless II webinar and associated guidance. Emphasis was placed on the evaluation of student needs and developing plans and budgets addressing the need for support services. Increased support is also being offered for ARP Homeless II through monthly office hours to provide LEAs not as familiar with McKinney-Vento with additional technical assistance and opportunities for collaboration. Further, in November of 2021, the SEA provided a live webinar for LEAs on utilizing CBOs within the McKinney-Vento program. This webinar included examples of how LEAs could collaborate with CBOs to provide needed wrap-around services to students and families experiencing homelessness. The SEA has also provided and will continue to provide LEAs with professional development/resources from other organizations such as the National Center for Homeless Education (NCHE) and SchoolHouse Connection (SHC) to LEAs on identification and outreach strategies, including how to plan and implement wrap-around services.

Additionally, the following SEA activities are currently in development:

- SEA is developing a competitive grant for LEAs to receive funds to hire or subcontract with a CBO to develop a system navigator to assist students and families in transition with wrap-around and other services.*

- *The SEA will host an annual statewide McKinney-Vento & ARP Homeless Conference in 2022 and beyond (dates TBD). The conference will be located in the middle of the state, so all LEAs have equal access to attend. Assessing needs and providing appropriate wrap-around services will be a major focus of the conference.*
- *The McKinney-Vento Grant Manager will provide quarterly webinars for ARP Homeless grantees. Webinars will be focused on specific topics, including wrap-around services. As noted above, a session focused specifically on working with community-based organizations to meet student needs was provided in November 2021.*
- *The McKinney-Vento Grant Manager will hold monthly office hours for ARP Homeless grantees or any homeless liaison to offer support and opportunities for collaboration.*
- *The SEA will either subcontract with an organization or utilize TDOE internal resources to develop a McKinney-Vento data dashboard. The dashboard will allow LEAs to view all of their homeless student data in one location and will contain information covering both academics and support services. Having greater access to in-depth data will allow LEAs to better identify and address barriers and gaps in wrap-around services.*
- *The SEA is developing a competitive grant for LEAs to receive funds to subcontract with a qualified and experienced CBO to develop a system navigator to assist students and families in transition with wrap-around and other services.*

2. How the SEA will use at least 75 percent of funds awarded under ARP Homeless II for distribution to LEAs in accordance with the final requirements. This must include a description of how the SEA will distribute funds in accordance with the required formula to address the needs of students experiencing homelessness and the extent to which the SEA has encouraged or will encourage the creation of consortia for those LEAs that may not meet the required minimum formula amount.

At least 75 percent of the SEA's ARP Homeless II funds were made available to LEAs on Sept. 1, 2021. The grant was based on ED's formula using an LEA's FY20 allocation under Title I, Part A, and either 2018-19 or 2019-20 homeless data, whichever year was higher. Based on guidance from ED, all LEAs must have met a threshold of at least \$5,000 to be considered a stand-alone LEA. As noted above, a webinar was held to communicate all requirements of ARP Homeless II, including consortia requirements.

LEAs were notified of their ARP Homeless II allocations on Aug. 9, 2021. 12 LEAs who did not receive an allocation of at least \$5,000 also received additional information regarding the requirement that they participate in a consortium in order to accept funds. All LEAs were asked to complete a brief survey to indicate plans for either accepting or releasing funds and plans for consortia/fiscal agent participation. A special appeal was also made to current McKinney-Vento subgrantees to volunteer to act as a fiscal agent. Utilizing this strategy, the SEA was able to secure more than enough potential fiscal agents to serve the 12 impacted consortia LEAs. Once LEAs were notified of their allocation and consortia eligibility and the LEA completed the aforementioned survey, the McKinney-Vento grant

manager conducted extensive outreach to the 12 consortia LEAs. This outreach included discussions on how these funds, although under \$5,000, could significantly impact their homeless programs. While many consortia LEAs were initially interested in taking ARP Homeless II funding, all 12 opted out and plan to release their funds. Several of these LEAs stated that they turned down the funds specifically due to the consortia requirement, while other LEAs stated that they do not have a need for additional funding at this time due to the influx of other relief dollars.

For both ARP Homeless I and ARP Homeless II:

- 3. How the SEA will ensure that ARP-HCY supplements the support and services provided with ARP ESSER funds and does not replace the use of ARP ESSER funds to support the needs of students experiencing homelessness.**

As mentioned above, several webinars and guidance documents were released to LEAs regarding ARP Homeless funding. All of these resources provided extensive explanation of ARP Homeless requirements, including supplement not supplant provisions. To help ensure that all regulations are met, the SEA maintains a two-level review process for ARP Homeless I and II applications, ensuring that all applications go through multiple levels of review. Reviewers are trained on supplement, not supplant and all other requirements. Reviewers have also been trained to look at each LEAs ESSER (and other applicable) applications as needed to ensure that all requirements are being met. During the application review process, reviewers are able to send an application back to the LEA with a request for revisions. Applications will not be granted approval until all requirements are met. Additionally, the actual ARP Homeless I and II applications have been designed to help ensure that LEAs are aware of and follow supplement, not supplant provisions. This includes the addition of the following open response question: "Describe how educational and wrap-around services/purchases (1) coordinate with and (2) supplement the programs and services provided under other programs, including the Title I, Part A homeless set-aside, the McKinney-Vento subgrant, and ESSER 1.0, 2.0, and 3.0 as indicated above?" An assurance stating, "The LEA will use funds received under the grant to supplement, not supplant, funds used before the award of the grant for purposes of providing services to homeless children and youth, including the McKinney-Vento subgrant, and ESSER 1.0, 2.0, and 3.0." was also included in the application to ensure all requirements are met.

- 4. The extent to which the SEA will use its State-level activities funds to award subgrants or contracts to community-based organizations that are well-positioned to identify children and youth experiencing homelessness in historically underserved populations such as rural children and youth, Tribal children and youth, students of color, children and youth with disabilities, English learners, LGBTQ+ youth, and pregnant, parenting, or caregiving students experiencing homelessness, and connect them to educationally-related support and wrap-around services.**

The SEA is developing a competitive grant, using its state-level activity funds, for LEAs to subcontract with qualified and experienced CBOs. This grant would allow LEAs to work with a CBO in developing

a system navigator program to strengthen identification and assist eligible students and families with wrap-around and other services. As part of the application process, LEAs must describe how their proposed program and CBO partner would help identify children and youth experiencing homelessness in historically underserved populations such as rural children and youth, Tribal children and youth, students of color, children and youth with disabilities, English learners, LGBTQ+ youth, and pregnant, parenting, or caregiving students experiencing homelessness (as applicable), and connect them to educationally-related support and wrap-around services. Subgrant applications will be reviewed carefully, and all proposed programming will be evaluated to ensure that LEAs and CBOs are well-positioned to identify children and youth experiencing homelessness in historically underserved populations.

Further, the SEA will either subcontract with an organization or utilize TDOE internal resources to develop a McKinney-Vento data dashboard. The dashboard will allow LEAs to view all of their homeless student data in one location and will contain information covering both academics and support services. Having greater access to in-depth data will allow LEAs to better recognize and address barriers and gaps in identification.

5. How the SEA will encourage LEAs to award contracts to community-based organizations to help identify and support historically underserved populations experiencing homelessness.

As noted above, the SEA has and will continue to provide webinars and guidance around the allowability of partnering with CBOs and the requirement to properly identify all students in transition, including those in underserved populations. Additionally, the McKinney-Vento Coordinator will host quarterly professional development webinars with McKinney-Vento and ARP Homeless I and II subgrantees. In November of 2021, the webinar was focused on best practices in community partnerships and how LEAs can work with leverage their relationships with CBOs to better serve students in transition, including those in underserved populations.

Further, the SEA is developing a competitive grant, using its state-level activity funds, for LEAs to subcontract with qualified and experienced CBOs. This grant would allow LEAs to work with a CBO in developing a system navigator program to strengthen identification and assist eligible students and families with wrap-around and other services. As part of the application process, LEAs must describe how their proposed program and CBO partner would help identify children and youth experiencing homelessness in historically underserved populations such as rural children and youth, Tribal children and youth, students of color, children and youth with disabilities, English learners, LGBTQ+ youth, and pregnant, parenting, or caregiving students experiencing homelessness (as applicable), and connect them to educationally-related support and wrap-around services. Subgrant applications will be reviewed carefully, and all proposed programming will be evaluated to ensure that LEAs and CBOs are well-positioned to identify children and youth experiencing homelessness in historically underserved populations.

AMERICAN RESCUE PLAN – EDUCATION FOR HOMELESS CHILDREN AND YOUTH PART C: OTHER ASSURANCES AND CERTIFICATIONS

The Chief State School Officer or his/her authorized representative assures or certifies the following:

- a. The SEA will conduct all its operations so that no person shall be excluded from participation in, be denied the benefits of, or be subject to discrimination under the ARP-HCY program or activity based on race, color, national origin (including a person’s limited English proficiency or English learner status and a person’s actual or perceived shared ancestry or ethnic characteristics), sex (including sexual orientation and gender identity), age, or disability. These non-discrimination obligations arise under Federal civil rights laws, including but not limited to Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments Act of 1972, section 504 of the Rehabilitation Act of 1973, and the Age Discrimination Act of 1975. In addition, the SEA must comply with all regulations, guidelines, and standards issued by the Department under any of these statutes.
- b. The State will comply with all applicable assurances in OMB Standard Forms 424B and D (Assurances for Non-Construction and Construction Programs), including the assurances relating to the legal authority to apply for assistance; access to records; conflict of interest; merit systems; nondiscrimination; Hatch Act provisions; labor standards; flood hazards; historic preservation; protection of human subjects; animal welfare; lead-based paint; Single Audit Act; and the general agreement to comply with all applicable Federal laws, executive orders, and regulations.
- c. With respect to the certification regarding lobbying in Department Form 80-0013, no Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the making or renewal of Federal grants under this program; the State will complete and submit Standard Form-LLL, “Disclosure Form to Report Lobbying,” when required (34 CFR part 82, Appendix B); and the State will require the full certification, as set forth in 34 CFR part 82, Appendix A, in the award documents for all subawards at all tiers.
- d. Any LEA receiving funding under this program will have on file with the State a set of assurances that meets the requirements of section 442 of the General Education Provisions Act (GEPA), 20 U.S.C. 1232e.
- e. To the extent applicable, an LEA will include in its local application a description of how the LEA will comply with the requirements of section 427 of GEPA, 20 U.S.C. 1228a.
- f. The description must include information on the steps the LEA proposes to take to permit students, teachers, and other program beneficiaries to overcome barriers (including barriers based on gender, race, color, national origin, disability, and age) that impede access to, or participation in, the program.
- g. The SEA will comply with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) requirements in Subpart D—Post Federal Award Requirements (2 CFR §§ 200.300-200.345) and Subpart E—Cost Principles (2 CFR

§§ 200.400-200.475) to ensure that LEAs, including charter schools that are LEAs, are using ARP-HCY funds for purposes that are reasonable, necessary, and allocable under the ARP Act and the McKinney-Vento Act of 1987, 42 U.S.C. §§ 11431-11435.

- h. The State and other entities will comply with the provisions of all applicable acts, regulations, and assurances; the provisions of the Education Department General Administrative Regulations (EDGAR) in 34 CFR parts 75, 76, 77, 81, 82, 84, 86, 97, 98, and 99; the OMB Guidelines to Agencies on Governmentwide Debarment and Suspension (No procurement) in 2 CFR part 180, as adopted and amended as regulations of the Department in 2 CFR part 3485; and the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards in 2 CFR part 200, as adopted and amended as regulations of the Department in 2 CFR part 3474.