



# NAVIGATING NEW AND FLEXIBLE FUNDING STREAMS FOR KIDS DURING COVID-19

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A guide from **Children's Funding Project**

Published April 2020

## About this guide

Recognizing the challenges that states, localities, and child and youth-serving organizations are facing in the midst of COVID-19, this guide is intended to help leaders at all levels take advantage of new funding opportunities from the COVID-19 Congressional stimulus packages and respond to the crisis by leveraging the flexibilities of new and existing funding. As the landscape of the COVID-19 response is quickly changing, Children's Funding Project will update this document periodically. Please be sure to follow CFP on [Twitter](#) and [LinkedIn](#) for new versions as they are released. **Also, we are constantly looking for examples of states and communities that are creatively serving children and youth in this challenging time. If you have an example to share, let CFP know and we can highlight it in future versions!**

## Who is this guide for?

This guide is for anyone who is part of a group that is able to impact funding for the child-and-youth-focused serves that may have been impacted by COVID-19: Members of state and local children's cabinets; leaders within collective impact partnerships, community schools, Promise Neighborhoods, Promise Zones, Choice Neighborhoods, Performance Partnership Pilots, and even the Federal Interagency Working Group on Youth Programs; and child and youth advocates. Essentially it is for those who are concerned that without a coordinated approach, so many of the gains we have made in improving child and youth well-being may be lost.

## How to use this guide

The guide is divided into two sections. The first section **New Federal Funding for COVID-19** provides a child and youth-centered overview of the stimulus packages passed by Congress as part of the COVID-19 legislative response. This is where local leaders can find information on accessing stimulus funds.

The second section **Flexibility of Large Federal Programs during Emergencies** focuses on how select federal funding streams, including new stimulus funds, can be used *flexibly* to address the needs of children and youth based on built-in policies and COVID-specific guidance from the federal government. Where possible, we include examples of how states and communities are actively using these flexibilities to better serve children and youth during this time. Programs and funding streams are in order of the ages of children and youth served: Early Childhood; Middle Childhood; Older Youth; and General (all ages).

## About Children's Funding Project

Children's Funding Project is a social impact organization that uses strategic financing to close equity and opportunity gaps for children. We provide research, coaching, and facilitation to state and local leaders on leveraging existing funding, generating new revenue, and administering funds. Founded in 2018 to strengthen the child and youth field's budget prowess, Children's Funding Project is a nonprofit based in Washington, DC.

## Table of Contents

Click on any section heading to go directly to the information you are seeking.

<b>PART 1: New Federal Funding for Kids During COVID-19.....</b>	<b>4</b>
<b>What is it and what does it fund? .....</b>	<b>4</b>
#1 - Coronavirus Preparedness and Response Supplemental Appropriations Act: HR - 6074.....	4
#2 - Families First Coronavirus Response Act: HR - 6201 .....	4
#3 - CARES Act (Coronavirus Aid, Relief, and Economic Security Act): HR - 748 .....	5
#4 - Paycheck Protection Program and Health Care Enhancement Act (pending Senate and Presidential approval) .....	5
<b>How can states, localities, and providers access these funds? .....</b>	<b>6</b>
Opportunities for States and Localities .....	6
Opportunities for Childcare and Out of School Time Providers, and Other Small Businesses and Organizations .....	7
<b>PART 2: Federal Funding Flexibility During Emergencies .....</b>	<b>9</b>
<b>Office of Management and Budget COVID-19 Guidance .....</b>	<b>9</b>
<b>Early Childhood .....</b>	<b>11</b>
Child Care and Development Fund (CCDF) and Child Care Development Block Grant (CCDBG).....	11
Maternal, Infant, and Early Childhood Home Visiting Program (MIECHV) .....	13
Head Start and Early Head Start.....	13
Healthy Start.....	15
Title V Maternal and Child Health Services Block Grant (MCH Services Block Grant) .....	16
The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC).....	17
Other Programs and Funding to Consider .....	18
<b>Middle Childhood .....</b>	<b>18</b>
Title I Part A.....	18
IDEA Part B & C.....	19
Project AWARE.....	21
Child Nutrition Programs .....	21
21st Century Community Learning Centers (21st CCLC) .....	23
Youth Mentoring.....	24
Other Programs and Funding to Consider .....	24
<b>Older Youth .....</b>	<b>25</b>
WIOA Youth Training Program.....	25
Career and Technical Education Grants to States.....	26
Consolidated Runaway and Homeless Youth Programs .....	27
Healthy Transitions .....	27
Other Programs and Funding to Consider .....	28
<b>General Funding for Children and Youth .....</b>	<b>29</b>
Supplemental Nutrition Assistance Program (SNAP).....	29
The Emergency Food Assistance Program (TEFAP).....	31
Child and Adult Care Food Program (CACFP).....	31
Temporary Assistance for Needy Families (TANF).....	33
Community Development Block Grants (CDBG) .....	33

*Last updated: April 21, 2020*

Community Services Block Grants (CSBG) .....	34
Children’s Health Insurance Program (CHIP) & Medicaid .....	35
Other Programs and Funding to Consider .....	36
<b>Conclusion.....</b>	<b>38</b>

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# PART 1

## New Federal Funding for Kids During COVID-19

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### What is it and what does it fund?

So far, Congress has passed three distinct relief packages in response to the COVID-19 pandemic. The third - the Coronavirus Aid, Relief, and Economic Security Act (CARES) - was passed on March 27, 2020 and provides arguably the greatest opportunities for funding children's services. *This section will be updated as additional information comes in regarding the fourth pending stimulus package*

#### #1 - Coronavirus Preparedness and Response Supplemental Appropriations Act: HR - 6074

[HR 6074, the Coronavirus Preparedness and Response Supplemental Appropriations Act](#), is the first bill to pass as part of the coronavirus stimulus package and signed into law on March 6, 2020. It focuses on funding the public health response to coronavirus. The legislation provides **\$8.3 billion** of new funding, including support for state and local health agencies, vaccine and treatment development, and loans for affected small businesses to lessen the economic blow of this public health emergency.

#### #2 - Families First Coronavirus Response Act: HR - 6201

The **second coronavirus bill**, [HR 6201 Families First Coronavirus Response Act](#) was signed into law March 18, 2020.

The **\$104B bill** guarantees free coronavirus testing through various means, provides paid leave (applies to certain public employers and private employers with fewer than 500 employees - [see the details of the paid leave policies here](#)<sup>1</sup>), and strengthens food security initiatives through additional investments in WIC, food banks, and senior nutrition. **The bill also provides**

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<sup>1</sup> Small businesses with fewer than 50 employees may qualify for exemption from the requirement to provide leave due to school closings or child care unavailability if the leave requirements would jeopardize the viability of the business as a going concern.

*Last updated: April 21, 2020*

**mechanisms for access to food for children who depend on free and reduced priced meals. Child and youth serving programs that are receiving additional funding from the Families First Coronavirus Response Act are noted throughout this document's section on funding flexibility.**

### **#3 - CARES Act (Coronavirus Aid, Relief, and Economic Security Act): HR - 748**

The third phase of Congress's coronavirus response, the [CARES Act](#) was signed into law on March 27, 2020. This **\$2 trillion stimulus bill** is significantly larger than the first and second phase and is focused on mitigating the economic impacts of the pandemic on individuals and businesses. In broad strokes, the CARES Act provides business loans and cash payments to qualifying individuals and families, creates a temporary Pandemic Unemployment Assistance (PUA) program, funds coronavirus response efforts by state and local governments, and allocates supplemental funding for public education. Key features of the bill relevant to children and youth are spelled out in a section titled "Children and Families Services Programs," in Title VIII of the Act which allocates \$1.874 billion total to programs including Community Services Block Grant activities and Head Start programs. Additionally, the bill provides some targeted support for the childcare sector, including \$3.5 billion for the Child Care and Development Block Grant, which will allow for continued payments to childcare providers even in the case of closures or decreases in enrollment related to COVID-19.

### **#4 – Paycheck Protection Program and Health Care Enhancement Act (to be updated pending Senate and Presidential approval)**

The Senate is poised to vote on a fourth stimulus package as of April 21, 2020—tentatively known as the Paycheck Protection Program and Health Care Enhancement Act. Though the specifics of the bill have yet to come to light, voters can expect a replenishment of the Paycheck Protection Program and supplemental funding for other small business disaster relief. It appears that the PPP will receive another \$310 billion, with defined amounts reserved for the smallest organizations. It does not seem at the time of this writing that Congress has reserved any additional funding for childcare or other specific youth services, despite advocates calling for increased dedicated, flexible funding for a childcare system that was already struggling prior to COVID-19. [Read NAEYC's specific recommendations regarding early childhood relief funding here.](#) Nonprofit organizations that largely serve children and youth have signed on in support of the Save Organizations that Serve (SOS) America Act which prioritizes the charitable sector for aid. At the local level, the [U.S. Conference of Mayors have asked for a package](#) that offers additional CDBG funding directly to cities with fewer than 500,000 people. And governor's will most certainly be [requesting increased aid for states](#) given the requirement to balance their budgets at the same time as revenue drops and spending increases to meet the need in fighting off COVID.

## How can states, localities, and providers access these funds?

With the size and scope of the various stimulus packages, it may be overwhelming for states, localities, and individual businesses to navigate the system and acquire newly available funding. Below we highlight several key funding opportunities within the CARES Act that states, localities, school districts, and providers/other small businesses may be able to use to support their child-and youth-serving programs and services.

### Opportunities for States and Localities

- **Education Stabilization Fund:** The [Education Stabilization Fund](#) allocates a total of \$30.75 billion to four grant programs: a [Governor's Emergency Education Relief Fund](#) (approx. \$3 billion); an [Elementary and Secondary School Emergency Relief Fund](#) (approx. \$13.2 billion); and a [Higher Education Emergency Relief Fund](#) (approx. \$14 billion). The U.S. Department of Education is also reserving [Education Stabilization Fund Discretionary Grants](#) (approx. \$307.5 million) for states hardest hit by coronavirus. While most of the funds will be disbursed to State Education Agencies (SEAs), Local Education Agencies (LEAs), and Institutes of Higher Education (IHEs) according to various formulas, governors must apply for their share of the Governor's Emergency Education Relief Fund. Governors can apply for funds by [completing this application](#) and emailing it to [GEERF@ed.gov](mailto:GEERF@ed.gov).
- **Coronavirus Relief Fund:** As mentioned earlier, the \$150 billion [Coronavirus Relief Fund](#) will be disbursed to states and territories based on share of population. Local governments with populations greater than 500,000 are eligible to bypass the state and receive a share of state's allocated funding directly but must certify with the Department of the Treasury that they meet the requirements to receive that funding directly.

All entities, states, territories, tribal governments and eligible units of local government, should receive this disbursement within 30 days. [See this helpful chart](#) from the Center on Budget and Policy Priorities to get a better sense of how much funding your state may receive, and what share of that funding will go to qualifying local governments. Keep in mind that local governments [eligible to receive direct payments](#) had to have [submitted required certification information](#) by an April 17, 2020 deadline to receive payment.

## Opportunities for Childcare and Out of School Time Providers, and Other Small Businesses and Organizations

- **Child Care and Development Block Grant:** State CCDF lead agencies will receive their share of the \$3.5 billion in CCDBG funding at the discretion of the federal government and have significant flexibility in determining how to allocate the funds. The CARES Act provides childcare funding for essential workers regardless of income eligibility, provides funding to reduce or eliminate revenue disruptions due to closures or decreased enrollment, and expands eligibility for these funds to childcare providers that were not previously receiving CCDBG assistance. CLASP provides [an overview of Immediate Considerations for State CCDF Lead Agencies here](#).
- **Emergency relief for small businesses:** This includes \$10 billion in **Economic Injury Disaster Loans (EIDLs)**, \$350 billion for a **Paycheck Protection Program (PPP)**, and \$17 billion in relief for small businesses with existing **Small Business Administration (SBA)** loans. It is important to note that many childcare providers, including nonprofits that were formerly unable to access these types of funds, may be eligible for some type of relief under this part of the legislation.
  - **Economic Injury Disaster Loans:** Providers with under 500 employees can now apply for Economic Injury Disaster Loans (EIDLs) of up to \$2 million dollars and receive an emergency loan advance of up to \$10,000 (\$1,000 per employee) to cover immediate costs incurred as a result of coronavirus [using this application](#). This forgivable \$10,000 advance is available to businesses even if they do not qualify for any additional EIDL funding after applying.
  - **SBA Debt Relief:** If providers currently have an SBA loan, the SBA will pay the principal and interest of new and current 7(a) loans for up to 6 months.
  - **Paycheck Protection Program:** Under the Paycheck Protection Program (PPP) administered by the SBA through its network of 1,800 lenders, small businesses, self-employed individuals, independent contractors and others can apply for loans of up to \$10 million (or 250% of an employer's average monthly payroll

### Community Development Financial Institutions (CDFIs) as Lenders

CDFIs are mission-driven institutions that offer financial services and support to small businesses in low-income communities using federal and private dollars. Many small and home based child care providers face barriers to accessing or are ineligible to receive the SBA loans offered through the CARES Act due to lack of existing relationship with a large national bank and/or banks having minimum lending amounts that small providers cannot meet. Therefore, CDFI's have an opportunity to make a major impact in supporting the child and youth providers through this time. CDFIs can forgive loans, become a PPP lender and make new low-cost loans, provide coaching to help providers maintain payroll and can offer support to providers when they are ready to re-open. There are several large CDFIs that lend to childcare centers and home based child care including: Justine Peterson Housing, Dreamspring, IFF, FINANTA and [First Children's Finance](#) (the only place-based CDFI solely focused on childcare lending).



*Last updated: April 21, 2020*

cost from February 15, 2019 to June 30, 2019). These loans (or portions of them) can eventually be forgiven if recipients maintain payroll and continue paying bills throughout the pandemic. The degree of forgiveness depends on payroll costs for employees below \$100,000 in annual income, mortgage and rent costs, and the like. To access this funding opportunity, providers and other small businesses should reach out to their lender and confirm that the institution is one of the lenders in the SBA network. If not, [they can go visit this website](#) to find a participating lender. If a truly small nonprofit or business is struggling to find a lender to work with they might pursue a CDFI lender in their community. (see section on CDFIs).

For additional guidance, you may find these resources helpful:

- A [flowchart](#) from the Committee on Small Business detailing EIDL grants and the PPP
- The First Five Years Fund [guide for childcare providers](#) applying for SBA loans and the PPP
- The National Council of Nonprofits [guide to loans](#) available for nonprofits in the CARES Act

### CDFIs in Action

Justine Petersen (JP), based in St. Louis, is the largest SBA microlender in the US and also has a CDFI subsidiary ([Great Rivers Community Capital](#)) that makes small business loans. In total, JP has \$1.62 million in outstanding loans to 77 small and home-based child-care providers. In response to COVID-19, JP is implementing a 6-month deferral period to all affected businesses. Also, JP is an approved PPP Lender. They deployed 43 PPP loans to local businesses for a total of \$1.9 million, some for as little as \$15,000 and several to child-care providers. They continue to package PPP request to be ready when Congress acts.

The owner of Good Shepherd Infant & Toddler Center reached out to her bank and was told that their PPP loan application would take several weeks. She currently has a loan with Justine Petersen for two daycare centers. She applied for a PPP loan with JP instead and was approved the same day she submitted all required documentation. She initially had to shut her daycare center due to COVID-19, but with the PPP loan, she will be able to pay her facilities' rent, rehire the staff and start preparing the Center to resume childcare services.

# PART 2

## Federal Funding Flexibility During Emergencies

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During emergencies, certain federal funding streams can be utilized in relatively unconventional ways to meet unexpected needs. **What follows is a cursory overview of how some of these funding streams and programs, separated by age served, can be used flexibly in times of disaster, and particularly during COVID-19.** *This section will be regularly updated based on federal guidance, including OMB directives and agency-specific announcements.*

### Office of Management and Budget COVID-19 Guidance

Since mid-March, the Office of Management and Budget has released several memos authorizing increased levels of flexibility for federal grant programs. While some of the policy implications of certain parts of these memos are not yet clearly understood, here is an overview of key directives issued from select memos issued from March 19 to April 10, 2020.

**This landscape is constantly shifting. Please use the following information on flexibilities as a starting point for reaching out to your own funding administrator to ensure proper procedure. Stay up to date with OMB directives by bookmarking [this page](#).**

#### **M-20-17<sup>2</sup> Administrative Relief for Recipients and Applicants of Federal Assistance Directly Impacted by the Novel Coronavirus (March 19, 2020)**

This memo reduces administrative requirements to allow for more efficient administration of relief funds

- Awarding agencies are able to waive the requirement for active System for Award Management (SAM) registration at time of award application.
- Current active SAM registrants with registrations expiring before May 16, 2020 are afforded a 60-day re-registration extension.
- Awarding agencies can be flexible with application deadlines.
- Awarding agencies that issue competitive grants and cooperative agreements can publish Notice of Funding Opportunities (NOFOs) for less than 30 days.
- Awarding agencies can offer no-cost extensions for awards active as of March 31, 2020 and scheduled to expire prior or up to December 31, 2020 for up to 12 months.

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<sup>2</sup> Expanded the applicable audience for OMB M-20-11, *Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus* (COVID-19 (March 9, 2020)

*Last updated: April 21, 2020*

- For continuation requests scheduled between April 1 and December 31, 2020, awarding agencies are able to accept brief statements of verification from recipients.
- Awarding agencies may allow grant recipients to continue to use grant funding for salaries and benefits consistent with recipients' salary funding source policies. Accordingly, activities necessary to resume project activity may be charged to grants.
- Awarding agencies can allow recipients to charge costs related to event cancellation, halted travel, or other activities affected by the public health emergency to grants.
- Awarding agencies can waive prior approval requirements in order to address the COVID-19 response.
- Some procurement requirements regarding geographical preferences and contracting small and minority businesses, women's business enterprises, and labor surplus area firms can be waived.
- Awarding agencies can extend deadlines for financial, performance, and other reports for up to three months beyond the due date.
- Awarding agencies can issue extensions of currently approved indirect cost rates for up to a year.
- Awarding agencies can allow grantees to delay submission of pending reports required to closeout expired projects for up to one year.
- Awarding agencies should allow recipients and subrecipients to delay the submission of their Single Audits 6 months beyond the normal due dates.

### **M-20-20 Repurposing Existing Federal Financial Assistance Programs and Awards to Support the Emergency Response to the Novel Coronavirus (COVID-19) (April 9, 2020)<sup>3</sup>**

The most sweeping directive issued yet, this memo instructs the heads of executive departments and agencies to "marshal all legally available federal resources to combat the crisis...OMB is issuing a class exception that allows Federal awarding agencies to repurpose their federal assistance awards (in whole or in part) to support the COVID-19 Response, as consistent with applicable laws." The memo therefore:

- Authorizes agencies to allow fund recipients to donate medical equipment purchased with federal assistance funds as well as donate labor, supplies, and contract services. This is the only direct guidance on repurposing of funds in this memo and leaves much to individual agency interpretation.
- While these instructions seem to give agencies and departments a wide berth with few guardrails, the memo does note that "any such donation or repurposing of funds as permitted here complies with all legal requirements associated with such funding, including but not limited to compliance with the purpose of the appropriations and any restrictions to programmatic statutes, appropriations, and fiscal laws."
- Additionally, agencies are instructed to advise recipients that should donations or fund repurposing cause a shortage of funds for the originally intended purpose, new funds may not be available.

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<sup>3</sup> As stated above, it is not yet completely clear how the directives included in this memo will be or should be received by agencies and departments.

## **M-20-21 Implementation Guidelines for Supplemental Funding Provided in Response to the Coronavirus Disease 2019 (COVID-19) (April 10, 2020)**

- Directs agencies to “leverage and continue to employ existing transparency and accountability mechanisms wherever possible” while still deploying funding quickly and efficiently.
- Directs agencies to be aware of program overlap and find ways to improve efficiency where there are common funding recipients.
- Regarding accountability and transparency, this memo directs the Office of Inspector General community and the Pandemic Response Accountability Committee (PRAC) to “work closely with OMB and the agencies to coordinate COVID-19 related oversight efforts, leverage available technology to minimize burden and duplicate efforts, and re-prioritize lower priority audit work to allow agencies and OIGs to better support higher priority COVID-19 work.”
- This memo also includes a number of specific reporting directives.

## **Early Childhood**

The following programs and funding streams cover services for infants, toddlers, and children up to age 5. For information on IDEA Part C, please see “IDEA Part B and C” in the Middle Childhood section of this report.

### **Child Care and Development Fund (CCDF) and Child Care Development Block Grant (CCDBG)**

In the case of COVID-19, states are able to take advantage of new appropriations for CCDF/CCDBG brought about by the CARES Act. There are also a number of flexibilities that states can leverage to better support children and providers during the crisis. For additional guidance on priority considerations for state CCDF agencies, see [this article](#) from CLASP.

#### **COVID-19 Resources for CCDF**

- **As noted in Part I of this document, the CARES Act affords additional funding and additional flexibility for CCDF funds beyond the standard recommended flexibility strategies (see below).** Please see [this resource](#) from the Office of Childcare to learn more about CCDF flexibility as it relates specifically to COVID-19.

#### **General Flexibilities**

- **Change eligibility/priority/requirements:** Lead agencies can broaden, waive, or otherwise target requirements to ensure continuity of care (especially if jobs are lost during the emergency) and permit emergency eligibility. Agencies have the authority to focus eligibility requirement changes on certain geographic parts of the state—there is no requirement that changes must apply statewide. Lead agencies also have some flexibility to define what counts as income.

- **Improve assistance to displaced families using quality dollars:** CCDF quality dollars may be used to provide emergency childcare of the highest quality (complying with [45 CFR 98.53](#)) that is reasonably practicable given the particular circumstance of displaced families, particularly in areas where existing childcare facilities are not operating or have been rendered unsafe. As we see more families experiencing homelessness in the wake of COVID-19, states can consider utilizing this flexibility strategy.
- **Waive co-payments for displaced/affected families:** Lead Agencies have the option to waive family co-payment requirements for families that meet criteria established by the Lead Agency.
- **Use quality dollars to provide grants to providers:** Lead Agencies may use existing quality improvement dollars to provide supply-building grants or contracts to providers for equipment, supplies, professional development and staffing, or other costs. These dollars can be targeted to areas of highest need at the discretion of the Lead Agency.
- **Increase resources available to CCDF families using other streams of assistance funding.** For example, states have the authority to transfer TANF dollars to CCDF for the purpose of funding childcare services, though at this juncture states should avoid taking this measure if possible, as more families will likely need direct payments from TANF in the coming months.
- **Utilize the federal early childhood training and technical assistance system.** Though not a direct funding resource, the Early Childhood Training and Technical Assistance System provides Lead Agencies, grantees, and providers with a library of resources for addressing emergencies and other extraordinary circumstances.
- **Submit a temporary waiver request for extraordinary circumstances.** As mentioned above, states can apply for waivers in the event of an emergency that can exempt Lead Agencies from standard CCDF requirements. For example, Lead Agencies can submit a temporary waiver that eases

## States Using CARES Act CCDBG Funding Strategically

- Governor of Virginia [Ralph Northam recently announced](#) that the state will be using its CCDBG dollars from the CARES Act in part to pay current subsidy providers and waive co-payments for families already receiving federal subsidies. These dollars will also go to ensuring that emergency childcare centers are accessible to children of essential personnel, some of whom are also Head Start parents with few childcare options while Head Start and Early Head Start centers are closed.
- New Jersey's Department of Human Services [is waiving](#) certain requirements, including parent co-pays. The state is also providing an additional \$100 per child per month to childcare providers.
- Arizona Governor Doug Ducey [has launched Arizona Enrichment Centers](#) to offer childcare for essential workers.
- Similarly, Colorado Governor Jared Polis [has established an Emergency Childcare Collaborative](#) to provide childcare for essential workers.
- North Dakota is offering [Child Care Emergency Operating Grants](#) to childcare providers to cover extra costs associated with COVID-19.

For more, See the [National Governors Association \(NGA\) Center for Best Practices](#). Link to publication forthcoming.

Last updated: April 21, 2020

health and background check requirements, as in the event of increased childcare demand.<sup>4</sup>

## Maternal, Infant, and Early Childhood Home Visiting Program (MIECHV)

The Maternal, Infant and Early Childhood Home Visiting Program (MIECHV) is administered by the Health Resources and Services Administration in partnership with the Administration for Children and Families. It provides evidence-based home visiting services for expecting and new mothers that meet income eligibility requirements through formula and competitive grants to states, territories, tribal entities and some nonprofit organizations.

### COVID-19 Resources for MIECHV

HRSA has released [a complete set of guidelines](#) for its Maternal and Child Health Bureau's program responses to coronavirus, including for MIECHV. Here are some of the MIECHV policies and flexibilities applicable to state and territorial agencies and nonprofit organizations while handling COVID-19:

- MIECHV-funded Local Implementing Agencies can use funds to continue to pay staff using those funds only if they are performing approved MIECHV activities within the scope of the grant. Some emergency activities are within the scope of the grant, including emergency planning and providing other support to families in response to COVID-19.
- Agencies are encouraged to continue to substitute face-to-face home visiting virtually or via their home visiting model's preferred or recommended method.
- Despite OMB's granting the option for no-cost extensions for grant awards that end before December 31, 2020, HRSA is not electing to offer extensions for MIECHV grantees.

### General Flexibilities

- With MIECHV's requirement that at least 75% of its formula funds in a jurisdiction go to evidence-based programs (e.g. Parents as Teachers, Nurse Family Partnership, Healthy Families America), flexibility can be limited. However, after its most recent authorization in 2018, jurisdictions can now use up to 25% of funding for pay-for-success initiatives that must demonstrate evidence of effectiveness based on successful outcomes. [Learn more here.](#)

## Head Start and Early Head Start

Head Start and Early Head Start promote school readiness of low-income children under 5 through education, health, social and other services in different settings depending on the needs

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<sup>4</sup> Administration for Children and Families, U.S. Department of Health and Human Services. ["Flexibility in Spending CCDF Funds in Response to Federal or State Declared Emergency Situations."](#) December 6, 2017.

Last updated: April 21, 2020

of the community. With Head Start and Early Head Start programs serving over one million children annually by way of over 1,500 local agencies, grantees can face immense challenges and administrative roadblocks in the event of a natural disaster or other emergency.

### COVID-19 Resources for Head Start and Early Head Start<sup>5</sup>

- **As part of the CARES Act, Congress authorized \$750 million in supplemental funds for Head Start, with \$250 million allocated to COVID-19 response and \$500 million allocated to supplemental summer programs.** See [this key guidance](#) from ACF on applying for and using these new funds.
- **Staff working at Head Start and Early Head Start centers are NOT expected to report to work and OHS is directing programs to continue to pay staff during COVID-19 closures.**
- **OHS recommends programs to maintain contact with children and families via alternative means like virtual communication and other “creative outreach that limits exposure and risk.”** OHS is *not* recommending face-to-face home visiting or other family outreach while COVID-19 is still a risk.
- In addition to leveraging the flexibilities provided by other nutrition programs (CACFP, SNAP and WIC for example), **Head Start programs are encouraged to use Head Start funds to provide meals and snacks to Head Start families in the community.** If funds are insufficient to cover costs, programs can request supplemental funding later this year.
- **Under the Head Start Act, programs can request a waiver to omit their 20% share of costs because of an emergency or disaster.** As Head Start programs have an administrative cost cap of 15%, programs [can request a waiver](#) for this limitation if greater administrative costs are presented by the pandemic.
- Additionally, ACF has authorized grantees to shift up to \$250,000 (or 25% of their annual funding between budget categories without prior approval.<sup>6</sup>

### General Flexibilities

According to [general disaster guidance](#) put forth by ACF in 2019, “The Administration for Children and Families (ACF) and the Office of Head Start (OHS) are very concerned about the devastation resulting from disasters affecting Head Start programs, children, families and staff. In the event of a significant disaster, such as a hurricane, wildfire, or tornado, OHS is removing barriers to make it easier for Head Start agencies to meet the needs of children and families, especially newly homeless children and families. Head Start programs serve a critical role in the recovery of impacted communities.” **Head Start and Early Head Start can take advantage of the following flexibilities in times of disaster:**

- **Even when physical Head Start facilities are closed or inoperable, HS staff can continue to support families by helping to connect them with alternative care for children,**

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<sup>5</sup> Head Start Early Childhood Learning & Knowledge Center. [“Responding to Head Start Grantee Questions on COVID-19: Updated March 31, 2020.”](#)

<sup>6</sup> Head Start Early Childhood Learning & Knowledge Center. [“General Disaster Recovery Flexibilities ACF-IM-HS-19-01.”](#) Last accessed April 14, 2020.

Last updated: April 21, 2020

and provide assistance with meeting basic needs, including nutrition, health, and mental health support.

- **Programs that have operable facilities are encouraged to open them up to displaced Head Start families** for supervised use including bathrooms, rest areas, laundry facilities, kitchens, computer and charging access. Additionally, grantees should do what they can to support families in accessing relief.
- **Grantees near impacted areas should consider the full spectrum of physical resources like equipment and supplies as well as staff that might be of assistance to Head Start programs and Head Start-eligible families in the affected areas.**
- While it is recommended that grantees only resume services when it is safe to do so for both staff and children, the goal for programs and administrative staff should be to resume services as soon as possible. **To accelerate resumption of services, OHS will consider issuing waivers to grantees directly affected by disaster. For instance, if a grantee is unable to comply with a certain standard or requirement that *does not endanger the health and safety of children or constitutes fraud or misuse of federal funds*, ACH and OHS may grant a waiver.**

## Healthy Start

Healthy Start is a grant program administered by the Health Resources and Services Administration (HRSA) that is aimed at reducing maternal and infant mortality via intervention. These interventions include risk assessments, health education, medical and psychosocial reports and referrals. Healthy Start aims to reduce infant mortality rates, increase access to early prenatal care and remove barriers to healthcare access. Healthy Start grants are discretionary and go to localities and nonprofit organizations.

### COVID-19 Resources for Healthy Start

The Health Resources and Services Administration is offering a number of waivers and other provisions to help programs manage the effects of COVID-19.

- **Once a Healthy Start grantee assesses potential acceptable work-from-home activities, HRSA states that “allowable costs awarded under a HRSA grant, would be permissible for reimbursement to an employee approved to work on grant duties at home** (due to COVID-19; Ref: 2 CFR § 200.403, 2 CFR § 200.404, 2 CFR § 200.405)...”<sup>7</sup>
- **Healthy Start grantees and sub-recipients can only use award funding for purposes described in the funding opportunity.** This means that grantees have limited flexibility when it comes to using funds for the purpose of responding to COVID-19, or more specifically, “costs that are not described in the funding opportunity or based in the referenced grant program statute are not approvable under a HRSA grant. Items that would not have been approved prior to COVID-19 are not allowed under the OMB M-20-17 flexibilities.

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<sup>7</sup> Health Resources & Services Administration. [“COVID-19 grantee frequently asked questions.”](#)



Last updated: April 21, 2020

- **HRSA's Division of Grants (DGP) can authorize extensions for grant applications.** Potential grantees can email [DGPWaivers@hrsa.gov](mailto:DGPWaivers@hrsa.gov) to request an extension.

## Title V Maternal and Child Health Services Block Grant (MCH Services Block Grant)

Title V Maternal and Child Health Services Block Grant (MCH Block Grant) is a grant given to states and other jurisdictions with the aim of increasing access to quality health care for mothers, children and their families. MCH Block Grant funds support programs that help reduce infant mortality, provide access to prenatal and postnatal care as well as access to preventive services and rehabilitative services for children, and promote community-based systems of coordinated care. Like MIECHV and Healthy Start, MCH Block Grant funding is administered by the Health Resources & Services Administration and is therefore subject to many of the same flexibility guidelines.

### COVID-19 Resources for Maternal and Child Health Block Grant

HRSA has published some [direct suggestions](#) for states to use their MCH Services Block grant funding to help in the response to COVID-19 in communities:

- “Offering the support or leadership of Title V epidemiologists, in partnership with other state staff, to an outbreak investigation.
- Providing support in educating the MCH population about COVID-19 through partnerships with other state agencies, medical providers, and health care organizations.
- Working closely with state and local emergency preparedness staff to assure that the needs of the MCH population are represented.
- Funding infrastructure that supports the response to COVID-19. For example, Public Health Nurses who are routinely supported through the Title V program may be able to be mobilized, using Title V funds or separate emergency funding, to support a call center or deliver health services.
- Partnering with parent networks and health care providers to provide accurate and reliable information to all families.
- Engaging community leaders, including faith-based leaders, to educate community members about strategies for preventing illness.”

As long as activities supported by the fund line up with state fiscal policies and comply with the MCH block grant requirement that 30% of federal funds support preventive and primary care services for children, 30% of federal funds be used for Children with Special Health Care needs (CSHCN), and a cap of 10% on administrative costs (the 30/30/10 rule). States can request waivers in extraordinary circumstances to relax the 30/30/10 rule.<sup>8</sup>

### General Flexibilities

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<sup>8</sup> U.S. Department of Health and Human Services, Health Resources and Services Administration. “Understanding Title V of the Social Security Act.” 7. Last accessed April 12, 2020.

*Last updated: April 21, 2020*

States have a good deal of discretion when it comes to using their MCH Block Grant funding, with the following constraints. Prohibited uses of grant funding include: most in-patient services; direct cash transfers to people receiving health services; funding new infrastructure or purchase of major medical equipment; transfer block grant funds to any other program; or used for research or training at a private nonprofit.<sup>9</sup>

## The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)

The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) gives grants to states to serve low-income women and their children up to age 5 by helping them access nutritious foods and providing nutrition and breastfeeding education.

### COVID-19 Resources for WIC

- Under the Families First Coronavirus Response Act (FFCRA), WIC has received an additional \$500 million to remain available through September 30, 2021, in order to accommodate additional program participation.
- As noted below under General Flexibilities and made explicitly available by the FFCRA, the USDA is able to grant waivers to states to remove the requirement that WIC applicants and participants show physical presence in order to enroll.
- Accordingly, states can obtain a waiver to remove the requirement that WIC participants physically pick up WIC EBT cards and instead authorize remote benefit issuance.
- Taking the interruptions to supply chains into account, the USDA has the authority to grant waivers that allow states to substitute certain types and amounts of some WIC-eligible foods for others.<sup>10</sup> [You can view the waivers granted to your state here.](#)

### General Flexibilities

The resources and services provided by WIC are important at all times but are especially crucial when disaster strikes. That said, unlike SNAP's D-SNAP program WIC does not have a built-in disaster relief allotment. According to the Food and Nutrition Service, "WIC's role in responding to disasters is minimal, as the program is neither designed nor funded to meet the basic nutritional needs of disaster survivors who would not otherwise be eligible to receive WIC benefits. Since there is no additional funding designated for WIC disaster relief, WIC programs must operate within its current program context and funding level even in disaster circumstances."<sup>11</sup><sup>12</sup> However, FNS does offer some suggestions to WIC Programs operating in the midst of a disaster:

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<sup>9</sup> Congressional Research Service. "[The Maternal and Child Health Services Block Grant: Background and funding.](#)" April 28, 2016. Last accessed April 12, 2020.

<sup>10</sup> USDA. [FNS Response to COVID-19.](#)

<sup>11</sup> USDA. "[Special Supplemental Nutrition Program for Women, Infants and Children \(WIC\): Guide to coordinating WIC services during disaster.](#)" 2017. 7.

<sup>12</sup> Except in the case of emergency appropriations, as with COVID-19.

Last updated: April 21, 2020

- “Persons with a serious illness that may be exacerbated by coming in to the WIC clinic may be exempt from the physical presence requirement (this would also apply if applicants/family members are under a voluntary quarantine).
- State agencies may extend the certification period for breastfeeding women, infants, infants and children by up to 30 days to accommodate difficulty in scheduling appointments.
- When WIC participants are unable to use their food instruments (checks or EBT cards) because they or another family member are under quarantine (voluntary or involuntary), they have the option to designate a proxy to redeem WIC benefits on their behalf.”<sup>13</sup>

## Other Programs and Funding to Consider

### Preschool Development Grant (PDG)

Though there is no specific guidance on how states who were recently awarded PDG should respond to COVID-19, they should consider how the use of these grant funds might be modified in the coming months and year.

#### Using Preschool Development Grants to Respond to COVID-19

So far, we have seen one example of a state with a PDG (Birth-Five) grant using funds to respond to COVID-19. Kansas’s Children’s Cabinet and Trust Fund announced \$500 Child Care Action Lab Grants for childcare providers in Kansas. They were ultimately able to give these grants to 180 providers (See the [Hunt institute](#) and [Kansas Children’s Cabinet Trust Fund’s Twitter page](#) for more information)

## Middle Childhood

### Title I Part A

The Title I, Part A Program is administered by the Department of Education and offers funding to schools and LEAs with higher percentages of children from low-income families. These funds support additional instruction in academic fundamentals and provide additional preschool, afterschool and summer opportunities to help children and youth meet or exceed state standards and otherwise thrive.

#### COVID-19 Resources for Title I Part A

- As part of the CARES Act, SEAs can request a waiver for LEAs to carry over more than 15% of their Title I allotment through the next fiscal year (19/20 funds) (See [the most](#)

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<sup>13</sup> USDA, “Special Supplemental Nutrition Program for Women Infants and Children (WIC)...” 7.

[recent template](#) for this waiver and others released in a streamlined format by the Department of Education).

### General Flexibilities

In the event of a disaster, the U.S. Department of Education can waive the requirement that State or LEA contributions to Title I Part A programs do not dip below 90% of the previous fiscal year's investment (this is known as the Maintenance of Effort requirement (see page 26 of [this guiding example](#) regarding the use of Title I funding increases as part of the American Reinvestment and Recovery Act).

## IDEA Part B & C

The Individuals with Disabilities Education Act (IDEA) requires that states and public agencies provide a free and appropriate education to the more than 6.5 million infants, toddlers, and children with disabilities in America. Meeting the requirements of IDEA is of course complicated by the closure of schools due to a national emergency such as COVID-19.

### COVID-19 Resources for IDEA Part B & C

- **IDEA Part B Guidance**
  - According to the Department of Education, during the COVID-19 outbreak LEAs can use funds to disseminate COVID-19 related information that is related to children with disabilities. See [this document](#) from the Department of Education for details on what is and is not an acceptable use of funds.
  - LEAs *cannot* provide general COVID-19 guidance not specific to children with disabilities or use LEA Part B funds to administer any COVID-19 vaccinations to children.
- **IDEA Part C Guidance**
  - Like IDEA Part B, IDEA Part C funds [can be used](#) to disseminate health and COVID-19 information to LEA's networks. Part B, Part C funds cannot be used to administer future COVID-19 vaccinations.
  - If the offices of the state lead agency or Early Intervention Services (EIS) program/provider are closed, then they are not required to provide EIS infants and toddlers during the time of the closure. However, "if the offices remain open, but Part C services cannot be provided in a particular location (such as in the

### Supporting Children with Special Needs During COVID-19

Despite having closed schools for the duration of the COVID-19 emergency, the State of New Mexico is ensuring that school districts support the transition of children from early intervention into preschool education. To do this, the State is requiring schools that offer behavioral health services for this purpose to remain open.

For more, See the [National Governors Association \(NGA\) Center for Best Practices](#). Link to publication forthcoming.

*Last updated: April 21, 2020*

child's home), by a particular EIS provider, or to a particular child who is infected with COVID-19, then the lead agency must ensure the continuity of services by, for example, providing services in a different location, by using a different EIS provider, or through alternate means, such as consultative services to the parent.”<sup>14</sup>

- When offices reopen post-closures, providers must assess each child's individualized family service plan (IFSP) to determine if any changes need to be made after the lapse in services.
- If face-to-face Part C services are not practical or safe for various reasons, then the EIS provider or service coordinator can consult with parents virtually via teleconference, email or other means.

### General flexibilities

IDEA Part B includes provisions related to formula grants that assist states in providing a free appropriate public education in the least restrictive environment for children with disabilities ages three through 21. Part B grants are fairly inflexible and ineligible for most waivers, as fulfilling the purpose of the program (to ensure that students with disabilities have a free and appropriate public education or in the case of private schools, equitable access to education, is paramount. In general, for IDEA Part B, if schools are required to provide instruction (remote or otherwise) to students in the general population then they are also required to provide equitable instruction to students with disabilities. During school closures, IEP teams are not required to meet in person, but can teleconference as needed. After extended closures, IEP teams are required to determine whether a student needs compensatory education for any skills lost during a closure.<sup>15</sup>

IDEA Part C includes provisions related to formula grants that assist states in providing early intervention services for infants and toddlers birth through age two and their families. The general guidance for Part C grants is captured below, as the COVID-19 guidance does not deviate significantly from standard disaster protocol.

### **Important note for state and local education agencies regarding IDEA Part B flexibility:**

The federal Secretary of Education has the authority to waive the requirement for state maintenance of effort (MOE) for special education and related services for one fiscal year at a time in the event of uncontrollable circumstances (States should contact the State Lead in the Office of Special Education Programs (OSEP) if they are interested in this waiver). At the local level, an LEA is expressly permitted to reduce its local MOE requirement in the event of a number of non-disaster related circumstances ([see here for more information on the specific circumstances](#))

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<sup>14</sup> Ibid, 7.

<sup>15</sup> U.S. Department of Education. [“Regulatory guidance on flexibility and waivers for grantees and program participants impacted by federally declared disasters.”](#) September 2017. 14.

## Project AWARE

Project AWARE (Advancing Wellness and Resiliency in Education), administered by the Substance Abuse and Mental Health Services Administration (SAMHSA), is a discretionary grant issued to State Educational Agencies for building capacity within SEAs, State Mental Health Agencies (SMHAs) and LEAs. It has a three-fold goal of increasing awareness of mental health issues among school-aged youth, training adults who work with youth to recognize and respond to mental health problems and helping to connect youth with behavioral health issues to necessary services.

### COVID-19 Resources for Project AWARE

Regarding flexibility related to COVID-19, Project AWARE grants fall under [SAMSHA's general COVID-19 authority/guidance](#). Flexibility highlights include:

- "...grant recipients may re-budget funds to other activities because of the current situation, as long as the activities are allowable under the FOA and in line with statutory requirements of the award."
  - To submit a COVID-19 related budget revision or modification, grant recipients should submit the request through eRACommons using the "COVID-19" post award amendment application.
- Grant recipients are empowered to complete grant activities virtually where possible, in most cases without a budget modification request.
- SAMHSA grant funding can be used to purchase personal protective equipment for authorized grant personnel carrying out grant-related activities (as of the writing of this guidance, SAMHSA grant funding **cannot** be used to purchase PPE for non-grant related purposes--though the OMB directives in M-20-20 may adjust these guidelines)
- SAMSHA grant funds can be used to purchase electronics (laptops and other devices) to deliver training and services under the grant, but **NOT** for clients.
- FY 2020 New Funding Opportunity Announcement deadlines will not be extended because of SAMSHA's one-year appropriation schedule.

It is worth noting that [applications for FY 2020 SEA grants](#) close on April 23, 2020 (deadline extended). SEAs interested in building this kind of capacity, which may be especially important during and after the pandemic, should consider applying.

## Child Nutrition Programs

The following programs are administered by the Food and Nutrition Service under the banner of "Child Nutrition Programs" and are subject to COVID-19 waivers:

- [National School Lunch Program](#) - provides free or reduced-price lunches to children as established under the National School Lunch Act (1946).
- [School Breakfast Program](#) - reimburses states for administering nonprofit breakfast programs in schools and residential childcare programs.
- [Summer Food Service Program](#) - provides meals and snacks to children and youth when school is not in session.

*Last updated: April 21, 2020*

- **Child and Adult Care Food Program** (described in detail under “General” funding for children and youth)

Though each program has a slightly different target population and mission, they all aim to ensure that no children go hungry, whether or not school is in session. This important mission becomes all the more critical during extended periods of school closures like the kind we are seeing in response to COVID-19.

### COVID-19 Resources for FNS Child Nutrition Programs

As alluded to above in the discussion of the Child and Adult Care Food Program, the Food and Nutrition Service has issued a series of waivers pursuant to the Families First Coronavirus Response Act that are valid through June 30, 2020 (or when the federally declared public health emergency ends, whichever comes first). These waivers relax certain requirements for program administrators. **The following waiver descriptions come directly from the FNS (CACFP dedicated waivers excepted):**

- **[Nationwide Waiver of Onsite Monitoring Requirements in the School Meals Programs](#)** - “FNS waives, for all State agencies and school food authorities (SFAs) that elect to be subject to this waiver, school meals onsite monitoring requirements included at 7 CFR 210.8, 210.18 and 220.8(h)...State agencies and SFAs should, to the maximum extent practicable, continue monitoring activities of Program operations offsite (e.g., through a desk audit)...In instances where an SFA is closed, the State agency may postpone the administrative review until school year 2020-2021. State agencies may request an extension of their current administrative review cycle to accommodate these postponements.”
- **[Nationwide Waiver of Onsite Monitoring Requirements for Sponsoring Organizations in the Summer Food Service Program](#)**- “...FNS waives, for all SFSP sponsoring organizations that elect to be subject to this waiver, that SFSP monitoring requirements included at 7 CFR 225.15(d) be conducted onsite.”
- **[Nationwide Waiver of Onsite Monitoring Requirements for State Agencies in the Summer Food Service Program](#)**- “... FNS waives, for all State agencies that elect to be subject to this waiver, that SFSP monitoring requirements included at 7 CFR 225.7(d)(2)(ii) be conducted onsite.”

**FNS is also issuing waivers pursuant to the COVID-19 Child Nutrition Response Act that relax certain requirements to make it easier for children who are not in school to receive meals. They are the following:**

- **[CN COVID-19 Meal Times Nationwide Waiver](#)** - This waiver allows programs participating in the National School Lunch Program, School Breakfast Program, Summer Food Service Program, and Child and Adult Care Food Program to serve meals outside of the standard meal times.
- **[CN COVID-19 Non-congregate Feeding Nationwide Waiver](#)** - This waiver removes the requirement that meals be served in group settings for programs participating in the

Last updated: April 21, 2020

National School Lunch Program, School Breakfast Program, Child and Adult Care Food Program, and Summer Food Service Program.

- [CN COVID-19 Afterschool Activity Waiver](#) - This waiver allows programs participating in the National School Lunch Program, School Breakfast Program, Child and Adult Care Food Program, and Summer Food Service Program to serve meals and snacks outside of the standard afterschool setting.
- [COVID-19 Nationwide Waiver to Allow Parents and Guardians to Pick Up Meals for Children](#) - This waiver allows parents and guardians in states that have been approved for non-congregate feeding to pick up meals for eligible children without the child being present.
- [COVID-19 Nationwide Waiver to Allow Meal Pattern Flexibility in the Child Nutrition Programs](#) - This waiver allows programs participating in the National School Lunch Program, School Breakfast Program, Child and Adult Care Food Programs, and Summer Food Service Program to relax compliance with meal pattern requirements.

### States Taking Advantage of FNS Waivers

Washington is one example of a state that is using the recently announced FNS waivers proactively. The state recently leveraged the Non-congregate Feeding Waiver as well as a waiver that allows Summer Food Service Program operation in non-Area eligible schools and locations.

For more, See the [National Governors Association \(NGA\) Center for Best Practices](#). Link to publication forthcoming.

## 21st Century Community Learning Centers (21st CCLC)

[21st Century Community Learning Center \(21st CCLC\)](#) grants support the creation of community learning centers that provide out-of-school time opportunities for students who attend high-poverty and low-performing schools.

### COVID-19 Resources for 21st Century Community Learning Centers

With schools and other community facilities closed to prevent the spread of COVID-19, 21st Century Community Learning Centers are also widely closed. As of April 9, 2020, it appears that state education agencies are directing the coronavirus response policies of 21st CCLCs in their jurisdictions.

For more details, see the [Afterschool Alliance's COVID-19 resources](#).



## 21<sup>st</sup> Century Community Learning Center Policy Directives

For examples of SEA policy directives, see [Ohio](#), [Vermont](#), and the [District of Columbia](#).

Common characteristics of these directives include:

- Learning Centers are encouraged to implement distance learning and enrichment programs to target students' academic needs.
- 21st CCLC staff can continue to be paid with 21st CCLC grant funds for work (including remote work) that advances the mission of programs.
- Grantees should keep careful records of activities completed during COVID-19 closures.

## Youth Mentoring

Administered by the Department of Justice's Office of Justice Programs and the Office of Juvenile Justice and Delinquency Prevention, Youth Mentoring grants fund community-based organizations (nonprofit, for-profit and faith based) that provide mentoring programs to at-risk youth who are or have been involved in the foster care system, justice system, and/or reentry programs. See [the most recent FOA](#) that closed on April 13, 2020 for additional information about the types of youth mentoring grants available.

### COVID-19 Resources for Youth Mentoring

In response to OMB memo M-20-17, the Office of Justice Programs [released guidance](#) for its award recipients on additional grant flexibilities in relation to COVID-19. Key takeaways from the guidance include:

- Recipients can continue to use funds to pay salaries and benefits, including the cost of leave, as consistent with the recipient's policies.
- Most OJP awards can receive a no-cost extension of up to 12 months
- Grantees can request closeout extensions up to 90 days before the award's end-date.
- Progress and performance measurement report due in March and April 2020 receive a 60 day extension.
- Award recipients that are holding OJP-sponsored conferences are encouraged to either substitute with virtual meetings and events or postpone or cancel as needed.

## Other Programs and Funding to Consider

### GEAR UP

With K-12 schools and higher education institutions closed for COVID-19, in some places indefinitely, GEAR UP programs have to find innovative ways to connect with the youth they serve. The National Council for Community and Education partnerships has curated [an excellent list](#) of resources offered by GEAR UP programs across the country to help GEAR UP educators transition productively to virtual instruction and connection with students.

Last updated: April 21, 2020

## Full-Service Community Schools

The [Full-Service Community Schools \(FSCS\) program](#), which is funded under the Fund for the Improvement of Education (FIE), encourages coordination of academic, social, and health services through partnerships among (1) public elementary and secondary schools; (2) the schools' local educational agencies (LEAs); and (3) community-based organizations, nonprofit organizations, and other public or private entities. Those running community schools may be well positioned to take a lead on the kind of coordination of resources that is possible with the newfound flexibility outlined in this guide. See the [Coalition for Community Schools](#) for insights into what community schools can do to better handle COVID-19.

## Older Youth

### WIOA Youth Training Program

The Workforce Innovation Opportunity Act Youth (WIOA) Youth Program provides training and job opportunities for 14-24 year-olds who are facing barriers to education, training and employment for post-secondary education and the workforce. It is estimated that 65% of young people participating in the WIOA Youth Training Program are under age 18.<sup>16</sup> Funding is disbursed to local and regional Workforce Investment Boards and is allocated via a fairly inflexible formula. For example, a minimum of 75% of WIOA Youth funds must be used to provide services to out-of-school-youth and 20% of funds must be used for paid and unpaid work experiences.<sup>17</sup>

#### COVID-19 Resources for the WIOA Youth Training Program:

Though not directly attached to the WIOA Youth Training Program, the [Department of Labor did announce the availability](#) of up to \$100 million in dislocated worker grants (DWGs) to states, tribal areas and territories supported by the Workforce Innovation and Opportunity Act of 2014 “to help address the workforce-related impacts of the public health emergency related to COVID-19, also known as novel coronavirus.”

### Workforce Development Boards Responding to COVID-19

In addition to this high-level federal investment, individual local Workforce Development boards are already working to provide resources to the youth they serve. For example, check out [Workforce Solutions Capital Area](#) in the Austin, TX region for some innovative youth-focused COVID-19 recovery resources.

<sup>16</sup> First Focus on Children: *Children's Budget 2019*. 113.

<sup>17</sup> Workforce Innovation and Opportunity Act: WIOA Youth Program Fact Sheet. 2. [Access here](#). Last Accessed April 12, 2020.

## General Flexibilities

Using the guidelines set forth by the Department of Labor's [Workforce Innovation and Opportunity Act Waiver Request Tool](#), states can request waivers from certain provisions. **Items prohibited from the Secretary's waiver authority include:** wage and labor standards, allocation of funds to local areas, non-displacement protections, eligibility of providers or participants, worker rights, establishment and functions of local areas and local Workforce Development Boards, participation and protection of workers and participants, procedures to review and approval of State and local plans, grievance procedures and judicial review, funding of infrastructure costs for One-Stop Centers, nondiscrimination, and other requirements related to the basic purposes of WIOA Title I.<sup>18</sup> **Examples of waivers approved in the last two years include:**

- **Waiver** of the obligation of eligible training providers (ETPS) to collect and report on the performance data on all students in a training program at WIOA Sections 116(d)(4)(A) and (B) and 122(d)(2)(A) and 20 CFR 677.230(a)(4) and (5) and 20 CFR 680.430(b)(5) - Submitted by Virginia Gov. Ralph Northam and approved by DOL on June 24 2019.
- **Waiver** of 20 CFR 681.550 in order to provide individual training accounts (ITAs) to in-school youth. Submitted by Utah Governor Gary Herbert and approved by DOL on June 12, 2018.

These are just two examples of ways that states are maximizing the innovative aspect of WIOA despite the relative inflexibility of funds. The waiver request opportunity may provide states the latitude to facilitate a more robust recovery after disasters like COVID-19. [See more waiver examples here.](#)

## Career and Technical Education Grants to States

Career and Technical Education Grants to States support the work of states and localities to provide high-quality career and technical education (CTE) for secondary and post-secondary students. Administered by the Department of Education, CTE grants are directed to states with lower per capita income and larger proportions of students from ages 16 to 20.

### COVID-19 Resources for Career and Technical Education

Recognizing the immense value provided by these programs and the administrators that run them at the state and local levels, the U.S. Department of Education announced [a number of procedural flexibilities](#) on March 31, 2020:

- The April 15, 2020 deadline for states to submit their Perkins V State Plans (plans for use of the funding granted under the Perkins Career and Technical Education Act of 2006) is extended to June 15, 2020.

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<sup>18</sup> U.S. Department of Labor, Employment and Training Administration, Workforce Innovation and Opportunity Act, [Waivers](#). Last accessed April 12, 2020.

*Last updated: April 21, 2020*

- States can authorize a subgrant under Perkins V to local recipients prior to fully approving its local application for funding.
- States are empowered to provide local recipients that are unable to apply by the typical deadline of July 1, 2020 with additional time to complete applications. DOE is making this possible by giving states the authority to extend the duration of the FY19-20 grants by three months.

States and localities may be able to take advantage of some of this procedural freedom to adapt their State and local applications for funding to better suit the future needs of their communities as they recover from the effects of COVID-19.

## Consolidated Runaway and Homeless Youth Programs

Consolidated Runaway and Homeless Youth Program (RHY) grants fund local facilities that provide temporary residential care and counseling and establish a national toll-free hotline. Examples of grantee programs include [Basic Center](#), [Transitional Living](#), and [Street Outreach](#). The funding for these programs is mostly relegated to allowable uses and therefore, generally, fairly inflexible in times of disaster. That said, the mission and services of programs funded via these grants are especially critical in times of disaster and economic downturn. To that end RHY programs are required to have emergency preparedness plans in place.<sup>19</sup>

### COVID-19 Resources for Consolidated Runaway and Homeless Youth Programs

The CARES Act allocated \$25 million in supplemental funding for programs funded under the Runaway and Homeless Youth Act. As noted previously, HHS has released [COVID-19 specific guidance](#) for programs that fall under the purview of the Administration for Children and Families. A summary of these flexibilities as they relate to RHY programs can be found [here](#).

## Healthy Transitions

The purpose of the Healthy Transitions Program, administered by the Substance Abuse and Mental Health Services Administration (SAMSHA), is to improve access to treatment and support services for youth and young adults, ages 16-25, who have had a serious emotional disturbance (SED) or a serious mental illness (SMI). Grants are made to state, tribal and territorial agencies in charge of delivering services to young adults with serious mental disorders.

### COVID-19 Resources for Healthy Transitions

Regarding flexibility related to COVID-19, Healthy Transitions grants fall under [SAMSHA's general COVID-19 authority/guidance](#). Flexibility highlights include:

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<sup>19</sup> 34 U.S.C. §§11222(a), 11212(b)(13) and 45 C.F.R. §1351.239g

*Last updated: April 21, 2020*

- “...grant recipients may re-budget funds to other activities because of the current situation, as long as the activities are allowable under the FOA and in line with statutory requirements of the award.”
  - To submit a COVID-19 related budget revision or modification, grant recipients should submit the request through eRACommons using the “COVID-19” post award amendment application.
- Grant recipients are empowered to complete grant activities virtually where possible, in most cases without a budget modification request.
- SAMHSA grant funding can be used to purchase personal protective equipment for authorized grant personnel carrying out grant-related activities (as of the writing of this guidance, SAMHSA grant funding **cannot** be used to purchase PPE for non-grant related purposes--though the OMB directives in M-20-20 may adjust these guidelines)
- SAMSHA grant funds can be used to purchase electronics (laptops and other devices) to deliver training and services under the grant, but **NOT** for clients.
- FY 2020 New Funding Opportunity Announcement deadlines will not be extended because of SAMSHA’s one-year appropriation schedule. This does not impact Healthy Transitions as of 4/13/20, as no FOA has been released for FY20.

### General Flexibilities

Funding granted under Healthy Transitions is allocated at the discretion of the state agencies who receive it and therefore comes with some degree of flexibility within the confines of the grant purposes.

## Other Programs and Funding to Consider

### TRIO

Composed of eight outreach and student services programs meant to provide support to individuals from disadvantaged backgrounds from middle school to post-baccalaureate programs. TRIO programs are funded by the U.S. Department of Education and therefore may be subject to some of the agency-wide COVID-19 flexibilities.

### Corporation for National and Community Service (CNCS)

The Corporation for National and Community Service (CNCS) operates AmeriCorps and SeniorCorps. As a major hub for mobilizing volunteers and community service efforts, leaders should keep up to date with [CNCS’s coronavirus guidance](#).

## Empowering Providers Through the COVID-19 Crisis and Beyond

The City of Orlando, Florida, is making great strides during this challenging time by supporting the professional development of providers through [the Families, Parks and Recreation Department](#). Thankfully, the department has not had to furlough any staff as a result of the crisis, and have even been able to provide professional development opportunities for staff and virtual learning opportunities for the youth they serve. By offering virtual online training to all staff, performing wellness check-in calls with students and families, and having AmeriCorps staff join the regular school day and provide tutoring, Orlando is setting both providers and youth up for success. The department has also developed a pilot program at one neighborhood center where youth can safely gather outside and staff can make sure they are staying on track in school.

## General Funding for Children and Youth

The following section discusses expanded flexibility for programs and funding streams that serve children, youth, and their families broadly.

### Supplemental Nutrition Assistance Program (SNAP)

The Supplemental Nutrition Assistance Program (SNAP) helps to ensure that low-income families have access to nutritious food. As more people experience unemployment and otherwise feel the effects of COVID-19 on the economy, SNAP is likely to gain participants in the coming months and play an important role in the COVID-19 recovery.

#### COVID-19 Resources for SNAP

- The CARES Act allocated \$15.8 billion to supplemental funding for SNAP available through September 30, 2021.
- As part of the Families First Coronavirus Response Act of 2020, the USDA has authorized state agencies to expand eligibility for SNAP benefits to SNAP and non-SNAP households with children whose schools have been closed for five or more days and who would be eligible for free or reduced-price school meals. Known as [Pandemic EBT \(P-EBT\)](#), this expansion provides additional benefits to households with eligible children. To operate a P-EBT program,

### States Leveraging SNAP Flexibilities

- Arkansas is suspending its SNAP work requirement through the end of April.
- Ohio is making it safer for SNAP recipients to shop for groceries with its [“Click and Collect” option](#) that enables recipients to order groceries online and pay with an EBT card either from their car or with a quick trip into the store.
- Connecticut [is extending](#) SNAP benefits to existing SNAP households so that all households will receive their maximum benefit.

For more, See the [National Governors Association \(NGA\) Center for Best Practices](#). Link to publication forthcoming.

states must submit a plan to USDA (see [State Guidance on Coronavirus Pandemic EBT](#)).

- Also secondary to the Families First Coronavirus Response Act of 2020, USDA is granting a number of waivers to states, including:
  - **Emergency Allotments:** Supplements for **existing SNAP households** based on a public health emergency declaration by the Secretary of Health and Human Services under section 319 of the Public Health Service Act related to an outbreak of COVID-19 when a state has also issued an emergency or disaster declaration.
  - **Extended Certification Periods:** Waiver that grants states the flexibility to adjust deadlines for participants to continue receiving SNAP benefits.
  - **Adjustments to Interview Requirements:** Under the Families First Coronavirus Response Act (section 2302), the Food and Nutrition Service is waiving some of the typical interview requirements for SNAP applicants through May 2020, for example:
    - Not requiring a household to complete an interview prior to approval, provided the applicants identity has been verified and all other mandatory verifications 7 C.F.R. 273.2(f)(1) have been completed.
    - Not offering a face-to-face interview or granting a request for a face-to-face interview to any household at application or recertification.
    - Not requiring that households that are eligible for expedited service to complete an interview prior to approval, provided that an applicant's identity has been identified and an attempt has been made to contact the household for an interview.
    - **Partially and temporarily suspending the Time Limit for Able-bodied Adults without Dependents (ABAWD):** Under the Families First Coronavirus Response Act, state agencies are prohibited from limiting "able-bodied adults without dependents participation in SNAP as laid out in section 6(o) of the Food and Nutrition Act of 2008.
  - **Flexibility for Quality Control Interviews:** States can conduct telephone interviews rather than face-to-face interviews for SNAP Quality Control purposes in March, April, and May 2020. States also have an optional 45-day extension on Quality Control case reviews that are due in April, May and June 2020. **States must notify the Food and Nutrition Service in advance if they choose to implement these flexibilities.**
  - **Flexibility for States with Increasing Workloads:** A flexibility introduced on February 6, 2020 independent from the COVID-19 pandemic response, USDA is allowing and encouraging state agencies to hire private vendors for call center operations--a way for these agencies to manage the increased caseload brought about by COVID-19.
- **A note regarding SNAP and the fourth stimulus package:** [Advocates are calling for](#) an increase in SNAP benefits and expansion of flexibility that will outlast the duration of the declared public health emergency.

## The Emergency Food Assistance Program (TEFAP)

Through The Emergency Food Assistance Program (TEFAP), the USDA distributes food to State Distributing Agencies. The amount of food distributed is commensurate with the number of unemployed people and those living below the poverty level and funds must, in part, be passed down to local agencies.

### COVID-19 Resources for TEFAP

- The Families First Coronavirus Response Act of 2020 **provided \$450 million in additional funding for TEFAP.**
- **Flexibilities to satisfy the requirements of social distancing:** TEFAP eligible recipient agencies (ERAS - i.e. food banks and food pantries) can distribute food via a drive-through system, central pick-up locations, and home delivery. This way, recipients can receive boxes of TEFAP foods with minimal social contact. Accordingly, if a state agency has a policy that requires recipients to provide a signature in order to receive food assistance, the state agency can amend its state plan to permit self-attestation in lieu of signatures.

### General flexibilities

- In the event of a presidential disaster declaration, **states have the authority to distribute existing inventories of USDA Foods to disaster relief organizations.**
  - Includes foods from TEFAP and other food assistance programs
  - Used for disaster responses in Florida, Texas, and Puerto Rico following Hurricanes Irma, Harvey and Maria in 2017.
  - With approval from USDA, states may release “commodity foods” and provide them to mass feeding sites. After the disaster is over, USDA replaces the commodities. If the president declares a major disaster, states may also distribute commodities directly to households.
- **State agencies can adjust TEFAP income eligibility guidelines at any time (7 CFR 251.6(b) and (c)).**

## Child and Adult Care Food Program (CACFP)

Via grants to states, the Child and Adult Care Food Program (CACFP) provides reimbursement to institutions that care for children, youth, older adults, and others with nutritious meals and snacks. These institutions include childcare centers, Head Start centers, out-of-school time centers, adult care centers, emergency shelters, and family childcare homes.

### COVID-19 Resources for CACFP

- **The Families First Coronavirus Response Act of 2020 allows for a number of COVID-specific waivers:**
  - [Nationwide Waiver of Monitoring Requirements for Sponsors in the Child and Adult Care Program:](#) This waiver relaxes monitoring requirements of



- CACFP facilities to account for closed facilities and the constraints of social distancing through June 30, 2020. Changes include:
- Sponsor organizations **only need to review each CACFP facility two times a year** (for the current review year) rather than three.<sup>20</sup>
  - Sponsor organizations only need to make **one unannounced facility review rather than two unannounced facility reviews**.<sup>21</sup>
  - The requirement that at least one unannounced review include observation of a meal service is waived.<sup>22</sup>
  - The requirement that not more than six months may elapse between facility reviews is waived.<sup>23</sup>
  - Though the requirement that sponsor organizations review each new facility during its first four weeks of Program operations<sup>24</sup> is **NOT** waived, **these reviews can happen via desk audit**.
- **Nationwide Waiver of Onsite Monitoring Requirements for State Agencies in the Child and Adult Care Food Program:**
- FNS waives the CACFP monitoring requirements included at Section 17 of the Richard B. Russell National School Lunch Act, as amended [42 U.S.C. 1766] as well as regulations at 7 CFR 225.5(b)(1) and 226.6(m)(6) **be conducted onsite**. Through 30, 2020 or until the federally declared public health emergency is over (whichever comes first), **FNS encourages State agencies to continue monitoring activities of Program operations offsite through a desk audit**.

### General Flexibilities

- In the event of a disaster, state CACFP agencies can use an expedited waiver process to apply to USDA for permission to temporarily relax program requirements. These waivers can relax program requirements such as defined meal components, record keeping, and enrollment and location requirements. Some states have disaster plans that include CACFP as part of a comprehensive response to disaster. Descriptions of some of these waivers are included in [this 2014 USDA memo](#).
- State agencies can designate any appropriate facility as an emergency shelter and provide all children through age 18 up to three meals a day using CACFP funds.<sup>25</sup>

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<sup>20</sup>Requirement at 7 CFR 226.16(d)(iii)

<sup>21</sup> Requirement at 7 CFR 226.16(d)(4)(iii)(A)

<sup>22</sup> 7 CFR 226.16(d)(4)(iii)(B)

<sup>23</sup> 7 CFR 226.16(d)(4)(iii)(D)

<sup>24</sup> CFR 226.16(d)(4)(iii)(C)

<sup>25</sup> California Department of Education, Disaster Response - Child Nutrition Programs. [Nutrition Services Division Management Bulletin](#). April 2015.

## Temporary Assistance for Needy Families (TANF)

Temporary Assistance for Needy Families (TANF) gives grants to states to provide cash assistance and other resources for low-income families with children.

### <sup>26</sup>COVID-19 Resources for TANF

- As of April 9, 2020, no additional allocation of TANF funds have been announced related to COVID-19.
- The Administration for Children & Families Office of Family Assistance [published guidance](#) on implications of the pandemic for TANF.
- The National Governors Association released a helpful guide to leveraging TANF dollars in the wake of COVID-19 ([Using TANF Funds to Support Families Impacted by Covid-19](#))

### States Leveraging TANF Dollars for COVID-19 Response

The Tennessee Department of Human Services [is extending](#) up to two months of emergency cash assistance for certain families that have been affected by COVID-19.

### General Flexibilities

- **States typically do not receive additional TANF funds in the event of an emergency; rather, they must use what has already been allocated.** That said, states may be able to shape how existing TANF funding is used or construed to better serve the needs of families. The clearest and most common example of this is using TANF funds to supplement Child Care Development Block Grant funds, but there are a multitude of other ways for states to diversify and magnify the impact of their TANF allocation.
- See [“States Should Invest More of Their TANF Dollars in Basic Assistance for Families”](#) from the Center for Budget and Policy Priorities for additional ideas for maximizing flexible use of TANF dollars.

## Community Development Block Grants (CDBG)

The Community Development Block Grant program is administered by the Department of Housing and Urban Development and provides formula-based block grant funding to states and eligible localities for the purpose of improving communities via supporting planning and administrative activities, public works and public facilities, public services, economic development, and reduction of blight. Typically, CDBG funds are allocated separately to 1) eligible entitled cities (principal cities in Metropolitan Statistical Areas; cities with at least 50,000 people; and qualified urban counties with at least 200,000 people), and 2) states, which receive grants to disburse to non-entitlement communities.

<sup>26</sup> See the [National Governors Association \(NGA\) Center for Best Practices](#). Link to publication forthcoming.

## COVID-19 Resources for CDBG

As part of the CARES Act Congress allocated an additional \$5 billion to HUD's Community Development Fund, with \$2 billion going to supplement traditional CDBG funding (allocated via the FY2020 funding formula - [see grant amounts here](#)), \$1 billion going to states and insular areas outside of the formula (based on the severity of COVID-19's impact), and \$2 billion that will be distributed at the discretion of the HUD Secretary.<sup>27</sup> For additional guidance on leveraging new and existing CDBG funding for the purposes of responding to COVID-19, see HUD's "[Quick Guide to CDBG Eligible Activities to Support Coronavirus and Other Infectious Disease Response](#)."

## General Flexibilities

CDBG funds are inherently flexible with national objectives that are well-suited to supporting disaster response at the local level. For example, states and communities can use CDBG funding to:

- Build or improve public facilities to serve specific needs of affected populations
- Provide grants or loans to small businesses, including childcare providers and other youth serving organizations and help them avoid job loss.
- Increase the provision of public services in direct response to a disaster (with a public services spending cap)

In addition to the leeway states and localities have in putting CDBG funds to use, HUD also administers a [Community Development Block Grant Disaster Recovery Program](#) (CDBG-DR), with flexible grants to aid communities in disaster recovery when the President has issued a disaster declaration (See this [Community Development block Grant Disaster Recovery \(CDBG-DR\) Policy Guidance for Grantees 2019 for comprehensive information](#)). Other disaster-related CDBG programs include [CDBG Mitigation \(CDBG-MIT\)](#) and [CDBG National Disaster Resilience \(CDBG-NDR\)](#).

### CDBG-Funded Disaster Response to Benefit Kids

**One example of how a community has used CDBG-DR funds for the benefit of children and youth occurred in 2011, after a destructive tornado hit the city of Joplin, Missouri.** A part of the city's plan for the second round of CDBG-DR funding (with a \$113 million allocation) was the construction of an Early Childhood Center to meet the increased needs of families secondary to the disaster. [Joplin Early Childhood, officially completed in 2018](#), now serves more than 320 3-5 year-olds with half-day preschool childcare, and kindergarten in 20 classrooms. The city received \$10 million in CDBG funds for the project.

## Community Services Block Grants (CSBG)

The [Community Services Block Grant \(CSBG\) program](#), administered by the Office of Community Services (an office of the Administration for Children and Families and the Department of Health and Human Services), provides grants to states to alleviate the conditions

<sup>27</sup> Congressional Research Service. "[Community development block grants and the CARES act](#)." April 6, 2020

Last updated: April 21, 2020

of poverty in communities. [Community Action Agencies \(CAAs\)](#) at the local level can also receive discretionary CSBG grants. All CSBG grants have the intended purpose of increasing self-sufficiency, improving living conditions, and increasing ownership of and pride in communities, and building strong family and support systems.<sup>28</sup>

### COVID-19 Resources for CSBG

- The Administration for Children and Families released COVID-19 specific administrative flexibility guidelines for all of its grant programs [here](#).
- The CARES Act authorizes an additional \$1 billion in grants to states, territories and tribes through CSBG. While states have the built-in authority to raise the income eligibility threshold to 125% (over the standard threshold of the federal poverty line), the CARES Act raises that ceiling to 200% for services furnished in fiscal years 2020 and 2021.

### General Flexibilities

According to the Office of Community Services, “CSBG eligible entities--more commonly known as Community Action Agencies (CAAs)-- can serve a critical role in serving families in communities before and after major disasters. To help assure an efficient response to community needs, OCS supports state and community efforts to include CAAs in planning for disasters and removing barriers to recovery in response to disasters.” **Some ways states and CAAs can flexibly use CSBG resources and funds include:**

- **Serving as a hub or central point of contact** for the provision of direct services to people in need in a community after a disaster.
- **Using CSBG-funded agency facilities as shelters or other alternative uses.**
- **Serving as a point of referral** to families regarding alternative sources of services and supports when immediate support services for urgent needs through the CAA are unavailable.
- **Existing CSBG allocations can be used to aid in disaster response**, as long as funds are used for statutorily allowable activities. State agencies do not need to request a waiver to use CSBG funds for serving low-income families in the midst of disaster response.<sup>29</sup>

## Children’s Health Insurance Program (CHIP) & Medicaid

As the key health care funding stream for low-income children and adults as well as those with disabilities, CHIP and Medicaid are vital programs that inevitably have critical roles in disaster response, particularly in the event of a pandemic.

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<sup>28</sup> Office of Community Services. [“About Community Services Block Grants.”](#)

<sup>29</sup> Community Services Block Grant Program information Memorandum, Transmittal No. 154. [“Disaster Recovery and CSBG”](#) March 7, 2018.

*Last updated: April 21, 2020*

## COVID-19 Resources for CHIP and Medicaid

Both the Families First Coronavirus Response Act and the CARES Act addressed policy changes and new flexibilities within CHIP and Medicaid in response to COVID-19.

### CHIP and Medicaid Provisions (Families First Coronavirus Act as amended by CARES, valid while the federal public health emergency is active)

- Increases the Federal Medicaid Assistance Percentage (FMAP) by 6.2 points for states and territories. This increase also applies indirectly to CHIP, which will in practice increase the CHIP matching rate by 4.34 points for states
- Prohibits cost-sharing for COVID-19 testing
- States can extend Medicaid coverage to the uninsured in order to cover COVID-19 testing.

See [this helpful resource](#) from the Georgetown University Health Policy Institute Center for Children and Families for a comprehensive overview of Families First Medicaid and Chip Provisions.

### General Flexibilities

When faced with a disaster or emergency, a state can submit a CHIP State Plan Amendment (SPA) that will temporarily adjust policies and procedures related to enrollment, cost sharing requirements, and the like. (See this [CHIP Disaster Relief State Plan Amendment](#) template for an example)

A state can submit a Medicaid State Plan Amendment to make temporary changes similar to those available for CHIP. Templates and instructions for submitting these amendments [can be found here](#).

## Other Programs and Funding to Consider

### McKinney-Vento Education for Homeless Children and Youth

Established under 42 USC Chapter 119, Subchapter VI Part B, the McKinney-Vento Education for Homeless Children and Youth (EHCY) provides children and youth experiencing homelessness with support to ensure that they have access to high-quality education and an additional layer of security while they are enrolled in school.

At this time, it is especially important that LEA liaisons are empowered with the resources they need to connect with affected students and their families. Aside from the assistance provided to K-12 schools via the CARES Act's Education Stabilization Fund, no dedicated McKinney-Vento funding or targeted flexibility has been announced by the Department of Education--though funding from the Education Stabilization Fund can go to support programs authorized by the Every Student Succeeds Act (including McKinney-Vento Homeless Assistance).

*Last updated: April 21, 2020*

## Promise Neighborhoods

Because Promise Neighborhood funding goes to key community-based organizations, those organizations hold some responsibility for helping their communities face and overcome the challenges presented by COVID-19. A great example of an organization doing this well is one of the original Promise Neighborhood, the Harlem Children's Zone (HCZ). To support the coronavirus response in their community, [HCZ staffers had prepared 4,000 packages of food](#) for the families they serve as of March 30, 2020. Community partners in the West Philly Promise Neighborhood are doing something similar, including [producing a COVID-19 resource guide](#) for the community.

Current Promise Neighborhoods have the position and latitude to provide essential services and support to the families in their neighborhoods and should leverage all connections with localities and local partners to make that happen.

*Last updated: April 21, 2020*

## Conclusion

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In publishing and regularly updating this guide to new COVID-19 funding and flexibility for kids, our hope is it will help state and local leaders, child and youth advocates, and other individuals and organizations proactively manage the effects of this public health emergency and economic crisis. By leveraging new funding and the flexibilities within existing programs, we can mitigate the negative impacts on and better serve children and youth.

**Remember: please use the information in this guide as a starting point for reaching out to your own funding administrators to ensure proper procedure.**

Be sure to follow Children's Funding Project on [Twitter](#) and [LinkedIn](#) for new versions as they are released. Sign up for our newsletter at <https://www.childrensfundingproject.org/>