



# America's Schools Provide Much More than Lessons; Children Out of School Need Congressional Action Now

In 1974, the Children's Defense Fund's first report, [Children Out of School in America](#), found that children with disabilities, children from low-income and unemployed families, children living in rural communities, and children of color made up a disproportionate number of the nearly two million children ages 7 to 17 that were not attending school—and usually they were not out of school by choice, but rather because they had been excluded. **Today, across the country, the same children are falling through the cracks.**

The COVID-19 pandemic has caused an education crisis unlike anything we've seen before, and it will impact this generation of students for the rest of their lives. In March, [55.1 million children](#) across the country had their education and lives swiftly upended: children left school on a Friday without any indication that they would not be back in their classrooms for the rest of the school year or beyond. School districts scrambled to adapt, and while many provided some level of distance learning opportunities, children with disabilities, children from low-income and unemployed families, children living in rural communities, and children of color are facing many barriers to accessing this modified education, which has carried into the fall in districts across the country.

These barriers include insufficient access to internet-connected devices, parent work schedules that do not allow for adequate support for their children's online learning, and some children's inability to effectively learn via the delivery of curriculum in this format, among many others. A shocking number of students may not have even had the chance to access modified education: [a survey of 477 school districts across the country](#) this spring found that only 1 in 3 had explicitly communicated an expectation that teachers would provide some level of instruction while schools were closed. All of this has created a well-documented crisis of learning loss. Children are facing a "COVID-19 slide" because of the disruption to their 2019-2020 school year that [research suggests](#) could mean a loss of 30 percent of the year's learning gains in reading and losses from more than 50 percent to as much as a whole year's worth of learning gains in math. As these conditions persist into the 2020-2021 school year, the perils grow, and the stakes for equity are magnified. Because the pandemic is hitting cities and communities of color hardest, we're seeing cases [even within individual cities](#) of higher-income white children returning to classrooms, while lower-income students of color continue struggling with insufficient virtual learning.

School districts are also facing a massive financial crisis that could force them to make budget cuts [even larger than those made as a result of the Great Recession](#), from which our nation's schools had still not recovered when this pandemic began. Even before the pandemic, budget inequities were acutely felt, as children living in poverty and children of color were already [more likely to attend schools that were poorly funded](#) than students living in lower-poverty school districts. **The impacts of this learning loss and the hit to school budgets will be felt for years to come, especially by children of color and children in already under-funded schools.**

"I do what I can, whenever I can, for my children." [Terri Johnson](#) has struggled to ensure her four children could keep up with school work since their school building closed in March. The only internet-connected device they have is a cell phone, so one Friday in March found her 16-year-old daughter, siblings in tow, sitting in the local McDonald's parking lot, connected to their Wi-Fi and completing an essay for English class. As the school shut-down continued, Terri's children tried to complete their offline packets and were able to complete some of their online assignments, but they were falling behind. When her cell phone broke, Terri's children lost the opportunity to even attempt a portion of their virtual learning.

When children are not attending school in person, they are not only missing out on vital education that is hard to deliver virtually; they are also abruptly without services they rely on and support from educators and professionals trained to connect them with resources and ensure their most urgent needs are met. As many schools returned to virtual instruction this fall, students are approaching almost a full year without those supports and services—which include access to healthy food, care for their physical and mental health, caring adults tasked with ensuring their safety, and federally mandated supports for marginalized students. Furthermore, while mortality rates for children remain lower than rates for adults, we know that children are not immune to either the health or economic impacts of this devastating pandemic. A [recent Center for Disease Control report](#) found that Black and Hispanic children are impacted much more severely by COVID-19 than their white peers, which means that many of the same children who are most harmed by the continued closure of schools are also the children who would face elevated health risks if schools were to reopen before it was safe to do so. In many ways, schools and administrators are facing a [“lose-lose quandary.”](#)

Congress has thus far provided some financial relief for the education system, including [\\$13.2 billion for K-12 schools in the CARES Act](#) passed by Congress in March, but most analyses suggest [the investment will fall far short of what is needed](#). The reality is children have been suffering from unmet needs ever since schools closed their doors, making their needs this fall that much more dire. As schools remain unsure of how they will safely reopen, there is not currently an end date to this suffering. **Congress must fully fund the programs and systems that support our nation’s children while they are out of school and invest in the public school system so that when schools can safely reopen, they will do so ready to meet the needs of children who have experienced significant learning loss, children newly experiencing poverty or homelessness, and children experiencing types of trauma that we cannot yet fully comprehend.**

**In addition to the responsibility our schools have to educate our children and prepare them for a successful transition to adulthood, we ask of them so much more. We ask K-12 schools to provide invaluable support to children by meeting some of their most basic needs, including access to healthy meals and basic physical and mental health care.**

## **Nutrition:**

Children can count on at least one complete meal per day at school, and many receive two meals a day. For too many children, these are the only meals they can count on. [More than half of students rely on free- or reduced-price meals](#), and in some parts of the country the percentage is even greater: 78 percent of children qualify for free- or reduced-price meals in Louisiana and 85 percent qualify in West Virginia.

Congress authorized some relief to children who would normally receive breakfast, lunch, or after-school snacks at school, including by authorizing the **Pandemic Electronic Benefits Transfer (P-EBT) program** in the Families First Act. This program was meant to provide money for families to buy groceries when school is closed and helped to lift [2.7 to 3.9 million children out of hunger](#). Yet, significant

difficulties remain in distributing benefits, identifying eligible children, and ensuring all children benefit. Furthermore, while school personnel were on the front lines trying to get meals to children who need them (these efforts included building grab-and-go lines at schools and delivering meals via bus routes), these efforts did not reach all of the children who needed and previously benefited from free- or reduced-price school meals.

Child hunger has always been a shameful truth in America, where we have vast wealth and yet do not feed our most vulnerable children. Now, continued unemployment and school closures are increasing childhood hunger, with [a third of households with children](#) not getting enough food each day.

A recent [Household Pulse Survey](#) suggested that during the pandemic, as many as 17 million children were not eating enough because their household couldn't afford it.

Congress must immediately invest in [solutions to get food on families' tables now](#), such as providing

emergency relief for school nutrition programs, extending and expanding eligibility for P-EBT, and increasing funding for programs like CACFP and WIC. It is also vital that we implement a long-term strategy to ensure children have what they need to thrive and do not go to bed hungry.

"It's overwhelming every day," said [Detroit resident Glenda Miggins](#), who struggles with the impossible choice of paying her rent and bills or feeding her son Artee, who is in the fourth grade. Artee relied on school meals before school buildings closed, but his mother's lack of a vehicle makes it difficult for her to get to schools or food pantries to pick up free meals. Glenda adds, "people don't know what you have to sacrifice, or who you may have to call or beg" for help.

## Health Care:

Children and families also rely on schools to access health care. Health services available at schools vary, from school nurses who help children care for their daily medical needs to school-based health centers (SBHCs) that provide far more comprehensive services to children and their families. The common thread is that children rely heavily on services provided by these health professionals in schools. Children and their families can count on SBHCs for a [full range of age-appropriate health care services](#), which include primary medical care, mental and behavioral health care, dental and oral health care, and much more.

These SBHCs serve [high percentages of low-income children](#): 89 percent of SBHCs serve at least one Title I school, and on average, 70 percent of students in schools with access to SBHCs are eligible for free- or reduced-price school lunch.

Mental health is just as important for our children's well-being as physical health. The number of children who receive critical mental health services and

interventions represents far too small a percentage of the number of children who show signs or symptoms of a mental health disorder and those who experience trauma. However, schools play that role for a massive number of the students who are getting the services they need. Of those children who do receive mental health services, [70-80 percent receive them at school](#). Without this support, particularly during a time of great stress for adults and children alike, our country's children are undoubtedly lacking the support they need to cope with fear, anxiety, and trauma, which could be detrimental to their mental health and other health outcomes for years to come.

Children are missing these health services in the midst of a global public health crisis, at a time when too many children are also missing [well-child exams and age-appropriate immunizations](#) because of fears related to COVID-19. Access to these preventive services is critical for [children's health, development, and even academic success](#).

Tanya Arnold's 7-year-old daughter had "just gotten on top of anxiety issues" under the care of mental health professionals at their "beloved" school-based health center. Then, COVID-19 hit, upending not just her education, but her health care, too. "One of the big triggers for my daughter is change," Arnold said, "so we immediately saw things start to spiral." In addition to losing the stability and consistency that school offers, Arnold's daughter lost that vital connection to school-based counselors. The realization that she wouldn't be reporting to school for the rest of the school year was "one of the biggest blows imaginable," according to [the Colorado Trust](#).

The services and support offered in school are particularly important for our country's most vulnerable children. Children with disabilities, those in or at risk of entering the child welfare system, those experiencing or at risk of experiencing homelessness, and those in need of extra academic support all rely on education professionals and services offered at schools to keep them safe and help them thrive.

## Support for Children with Disabilities:

The aforementioned 1974 Children's Defense Fund report, *Children Out of School in America*, and the organizing that followed, led to the passage of what is now the Individuals with Disabilities Education Act (IDEA), the first law that guaranteed all children a right to a free, appropriate public education. Nearly [one in seven public school students](#)—that's 7.1 million children in total—received special education services through IDEA during the 2018-2019 school year. Students receive special education services for a wide range of disabilities, including specific learning disabilities, speech and language impairments, health impairments, autism, developmental disabilities, intellectual disabilities, emotional disabilities, hearing and/or visual impairments, orthopedic impairments, and even traumatic brain injuries. American Indian/Alaska Native students and Black students are [more likely than their classmates to receive services under IDEA](#).

A child's Individualized Education Plan (IEP) under IDEA specifies the support and services the child will receive to enable them to be successful in school. These supports [may include accommodations](#) to the way the child receives directions or absorbs the lesson, to the way they complete assignments,

to the setting in which they learn, or to the timing and schedule on which they have to complete tasks or tests, or they may include modifications to assignments or the curriculum. Some students may even receive support for overall wellness and functioning, including speech, occupational, and physical therapy. The accommodations, modifications, and support services that children with disabilities receive are particularly difficult to deliver virtually, and we're seeing examples across the country of children not receiving the services to which they are entitled during this pandemic. Children and their parents are being left out of decisions about how to meet students' needs while children are not reporting to schools, and there are even documented examples of parents being asked to [actively waive their rights](#). Schools are understandably struggling to meet the requirements laid out in IEPs, but [as the U.S. Secretary of Education noted](#), IDEA offers enough flexibility that schools should still be able to find a way to meet students' needs and protect their civil rights. If children with disabilities are not receiving the free, appropriate public education to which they are entitled, then we are failing to uphold our promise to America's children.

[Waylon Hendricks](#) is a busy active four-and-half-year-old who has been non-verbal since birth. Before the pandemic, he was enrolled in a pre-K individualized education program that provided him the structure, personalized attention, and therapeutic services he needed to thrive. According to his mother, Michelle, "he was doing really well, making progress, and all of a sudden COVID happened. They closed the schools." Now, as she and her husband also work full-time, they are struggling to provide the support Waylon needs. "He's just continually behind."

## Child Welfare:

When children are regularly attending school, they are in close contact with caring adults who are responsible not only for ensuring the children are safe in school, but also for noticing and addressing any signs that children may not be safe outside of

school. Educators were responsible for [21 percent of the 4.3 million referrals](#) regarding possible child abuse and neglect that were made in 2018; and while the majority of these referrals were unsubstantiated, we have reason to be

concerned about children who are falling through the cracks. Importantly, teachers' ability to see early warning signs lead schools to be among the most important partners in connecting families with support services in the community so that families stay strong and children stay safe. With students out of school, they are less likely to have access to trusted teachers, counselors, and other adults who children might feel comfortable confiding in and seeking support from and who—in the absence of that kind of confidence—might notice signs that families are struggling or of possible neglect or abuse. This is especially concerning during a public health crisis and the resulting economic crisis, which have undoubtedly led to increased stress and anxiety for many families. [“The stress of unemployment and financial insecurity have strained relationships between children and those who care for them,”](#) at

the same moment that caring adults in other parts of their lives are losing contact with them. There is reason to be concerned that the unprecedented stress and challenges facing families during the pandemic may lead to more children at risk of abuse and neglect; the National Sexual Assault Hotline has seen a [dramatic increase in calls from minors](#) and hospitals are reporting [more severe cases of abuse](#). While the data is still unclear on whether the pandemic will lead to a spike in child maltreatment cases, we know there are clear, actionable steps we can take now to ensure families are able to weather this stress. By investing in community-based programs, such as home visiting and family resource centers, which are continuing to provide vital services during the pandemic, we can help keep families strong so children are not only safe, but are ready to learn and thrive when they return to school.

“Much of my day was spent with counselors and social workers addressing crises in teenagers’ lives. Child protective services was called, on average, once a month. Combating truancy, school phobia, student depression, and drug dependency were part of our everyday work...Students at risk can easily slip through cracks. Due to the isolation of remote learning, those cracks have become crevices.” - [Carol Burris, former high school principal, Long Island, NY.](#)

## Homelessness:

Children experiencing homelessness receive resources and support at school, but many are missing out on that support while schools are closed. A shocking [1.5 million children experiencing homelessness](#) were enrolled in public schools during the 2017-18 school year. Under the federal [McKinney-Vento Homeless Assistance Act](#), students experiencing homelessness have rights that guarantee them equal access to the same free, appropriate public education that all other students receive. In order to ensure children experiencing homelessness are able to participate fully in school and be successful, local educational agencies (LEAs) are required to designate a liaison for children experiencing homelessness, who is responsible for ensuring that barriers to identification, enrollment, and retention in school are identified and removed. These liaisons are also tasked with ensuring children have access to the services for which they are eligible or the referrals they need to find support, including Head Start and early intervention services, health and

mental health care services, and more.

Children, especially children of color, experiencing homelessness are hard to reach in schools, but physical separation from students is making it even more difficult for these liaisons to identify children who have recently started experiencing homelessness. We know that [55 percent of households](#) with a child under the age of 18 had at least one adult lose employment income since the start of COVID-19, and as key supports like expanded unemployment benefits and eviction moratoriums expire, we are [likely to see an increase in evictions nationwide](#)—for Black and Latinx households in particular—and a corresponding increase in children newly experiencing homelessness. Right now, because of the pandemic, job loss, and loss of income, households with children are in a dire situation. By the middle of July, [1 in 4 of the 30 million renter households with children were behind](#)



[on rent](#). As liaisons for youth experiencing homelessness are already experiencing difficulties reaching the students who rely on their services,

## Out-of-School Time Opportunities:

In addition to missing out on the education and enrichment that children receive in-person during school hours, many children abruptly lost access to the out-of-school time supports that they rely on when schools closed their doors in March. Before school, after-school, and summer learning opportunities complement the traditional school day in a number of ways, providing a range of academic and social-emotional support that extend the impact of the school day. Some high-quality programs focus on lessening the large achievement gap that persists in this country—and is widening due to the impact of school closures from COVID-19. The CDF Freedom Schools® program is one such out-of-school time program that is intended to support our country's most marginalized learners. *CDF Freedom Schools* sites serve predominantly low-income children of color, who are also the children disproportionately impacted by the inequities and injustices magnified by COVID-19. Children who attend *CDF Freedom Schools* programs during the summer [have shown](#) statistically-significant and practically-significant positive learning gains. In 2019, nearly 85 percent of our scholars either improved or maintained their reading skills over the course of the six-week program and avoided the summer learning loss often suffered by children not participating in summer enrichment.

Out-of-school time programs also support the social-emotional development of school-aged children. Children who attend *CDF Freedom Schools* programs [have been shown](#) to have more social and academic confidence and demonstrated that they have learned new ways to resolve conflict. [Afterschool Alliance reports](#) that access to caring mentors, safe and supportive environments, and opportunities to develop protective factors like “positive self-concept, competence, self-efficacy, agency, self-regulation,

it will also be very difficult for them to identify and support children who are newly in need of their help.

problem solving and decision making, interpersonal skills, and belonging and connectedness” are all benefits of out-of-school time programs, particularly for adolescents. Young people [have reported](#) that involvement in after-school and summer learning opportunities have “helped them work well with their peers” and “communicate productively.” At a time when children and young people are experiencing unprecedented adversity and barriers to their learning and development due to the pandemic, the loss of these opportunities is an additional blow.

The *CDF Freedom Schools* model also focuses on parent and family engagement and on building a love of learning; in a school year where children may struggle to learn in an unfamiliar learning environment and where “face time” with educators may be extremely limited, our schools must prioritize the same. *CDF Freedom Schools* sites operated across the country this summer, maintaining support for scholars and their families when they needed it most. Many of our sponsor organizations went the extra mile and delivered meals and materials directly to the homes of families, to ensure their needs were still met amidst the pandemic. We are currently offering virtual out-of-school time programming across the nation, as well. In doing so, we are exposing scholars to culturally relevant texts and lesson plans that create safe spaces for children and families to discuss current events and their ability to make a difference. We are also amending the model to build in homework time to support scholars who are learning virtually and have set up partnerships to deliver meals to families in need. Building real connections with families and understanding their situations will help schools and educators meet children where they are, thereby increasing the chances of educational success.

“[My daughter] really enjoyed [the CDF Freedom Schools summer program], during the unfortunate events we are all experiencing. [She] was able to connect with others, meet new friends, and is excited about reading. She can’t wait till next summer.” - Parent of a CDF Freedom Schools scholar, summer 2020

## Policy Solutions

This fall, whether children are returning to their school buildings or not, they are in need of more support than ever. The country's most vulnerable children—a population that is only growing as the COVID-19 crisis has caused more families to fall into poverty—will need academic support and beyond.

### Nutrition:

That so many children could lose access to healthy meals as schools remain closed or reopen at reduced capacity this fall proves a massive failure, as a country, to protect our children and ensure their basic necessities. Even before the pandemic, [more than 11 million children—about 1 in 7—were going to bed hungry](#), and those numbers were worse for children of color. Throughout the remainder of the pandemic, [we must](#):

- **Provide emergency relief for school nutrition programs and higher reimbursement rates for meals served during the 2019-2020 and 2020-2021 school years.** Many school meal programs and schools are incurring additional costs to transport and package food but losing revenue as participation decreases. To sustain these essential feeding programs and prevent further cuts in education budgets, Congress must provide additional funding to cover their operating costs during the pandemic.
- **Increase funding for the Child and Adult Care Food Program (CACFP)** to help child care centers continue to serve free- or reduced-price meals and cover rising operating costs.
- **Extend the Pandemic Electronic Benefits Transfer (P-EBT) program through FY2021 and expand P-EBT to cover young children under six** to ensure children can continue to access food until schools, preschools, and child care programs can safely reopen or if they are forced to close due to another outbreak.
- **Increase funding for the Supplemental Nutrition Program for Women, Infants, and Children (WIC)**, raise the value of the WIC Cash Value Voucher (CVV) to \$35 per month for women and children throughout the duration of the public health crisis, and ensure participants can purchase groceries online.
- **[Strengthen SNAP](#)** by boosting benefits, suspending harmful rules, and waiving harsh work requirements.

### Health Care:

During a global pandemic, it's critical that we ensure children have access to affordable, appropriate health care. To keep our nation's children healthy, Congress must:

- **Provide an additional federal medical assistance percentage (FMAP) increase** of at least 5.8 percentage points for a total of 12 points to ensure Medicaid can continue to act as a powerful first responder for children, families, and communities and meet the needs of children who would otherwise have received health services in school.
- **Ensure that Medicaid providers can keep their doors open**, so that children who aren't receiving health services in their schools will be able to access these services in their communities.
- **Increase outreach and enrollment efforts** to ensure families are connected to needed health coverage. For the past three years, children have continued to lose health insurance, and even before the pandemic, [5.7 percent of children were uninsured](#). We know loss of health insurance has only worsened in recent months as high unemployment rates mean many families are losing access to job-based insurance. With the ongoing pandemic, it is more critical than ever to ensure families have the coverage they need.
- Provide children and families with ongoing **virtual access to mental health supports**.

## Support for Children with Disabilities:

While the impact of the crisis on the academic outcomes for a whole generation of students will be significant, children with disabilities are especially at-risk of missing vital instruction and supports that help them meet developmental milestones as long as in-person instruction is suspended. In order to support children with disabilities, state and local education agencies must ensure:

- Teams responsible for children's IEPs **involve parents in all decisions.**
- **Parents' rights to due process remain intact** as schools negotiate different instructional environments.
- Use of federal education funds **adhere to IDEA, the Rehabilitation Act**, the Americans with Disabilities Act, and other civil rights laws.

## Child Welfare:

We must also fund and strengthen our country's child welfare system so that it can support families and keep children safe from child abuse and neglect, while also ensuring prevention and intervention systems can meet the challenges presented by the COVID-19 pandemic. Congress must strengthen the child welfare system by enacting the bipartisan Supporting Foster Youth and Families through the Pandemic Act (H. 7947) or [the Child Welfare Emergency Assistance Act](#) (S. 4172) and invest in keeping families strong by implementing the CAPTA provisions in the Coronavirus Child Care and Education Relief Act (S. 4112), which together would:

- **Increase funding to CAPTA Title II** Community-Based Child Abuse Prevention (CB-CAP) grants.
- **Increase funding to Title IV-B**, the MaryLee Allen Promoting Safe and Stable Families (PSSF) Program and the Stephanie Tubbs Jones Child Welfare Services (CWS) Program.
- **Raise the federal reimbursement rate** for the new Title IV-E Prevention Program to 100%.
- **Increase funding to kinship navigator programs.**
- **Increase funding for [the John H. Chafee Foster Care Program for Successful Transition to Adulthood](#).**
- **Increase funding to the Court Improvement Program.**
- **Increase funding to CAPTA Title I.**

## Homelessness:

More than 52 million people have filed for unemployment because of the pandemic, and more than half of households with children have lost income. The housing crisis that existed in this country before COVID-19 is likely to become even more dire, particularly for Black and Latinx families that have been disproportionately harmed by both the housing crisis and COVID-19. Families need urgent investment from Congress to prevent extreme hardship and skyrocketing homelessness.. Congress must:

- Provide at least [\\$100 billion in rental assistance](#) and [\\$11.5 billion in emergency assistance for people experiencing homelessness](#).
- Enact a uniform, nationwide **moratorium on evictions** for the next 12 months, to prevent families from newly experiencing homelessness as a result of the crisis.
- Increase and provide flexible funding for **the McKinney-Vento Education for Homeless Children and Youth (EHCY) program**, so that schools can support children who are already experiencing homelessness by providing access to school meals and other school-based services.



## Out-of-School Time Opportunities:

Out-of-school time programs like *CDF Freedom Schools* provide a standard for how schools can seek to meet the needs of their students in this new reality. Out-of-school time programs, like schools, will need to meet increased need when they are able to safely reopen, and they must be fully funded to equip them to do so. Congress must **increase funding for the Nita M. Lowey 21st Century Community Learning Centers program** by \$500 million to support current and new grantees to broaden the supports available for children, families, and communities.

- “This is my great worry. In a moment when we should be investing, we’re going to be seeing cuts because
- Congress apparently feels no urgency in addressing this issue as schools are trying to get ready for what is
- arguably the most important beginning of a school year that will happen in the lifetimes of these children.” -
- [Senator Tina Smith](#) (D-Minn.)

The CARES Act allocated [\\$13.2 billion for K-12 schools](#), but this does not even come close to meeting the needs of our public education system, as schools grapple with trying to safely reopen their doors or provide appropriate and sufficient education virtually this fall. The American Federation of Teachers estimates that [public schools need at least \\$116.5 billion](#) in order to safely reopen, and former Secretary of Education John B. King, Jr. called for [\\$500 billion for state and local governments and at least \\$175 billion for K-12 education](#). [CDF joined leading public health organizations](#) echoing the need for substantial funding, calling for at least \$200 billion in additional funding for K-12 education and programs that support marginalized students. Education leaders from across the country warned that without a large and urgent congressional investment in public education, our students are facing a “[perfect storm](#)” of problems: schools with scant budgets will be forced to make massive cuts, which will likely come from the parts of school budgets meant to provide critical resources to marginalized students, exactly at the moment when students are going to need more support than ever. And these are not short-term needs—the unprecedented disruption that has impacted every aspect of children’s lives will be felt for years to come. As detailed above, children across the country rely on schools and school personnel for so much more than instruction, and the children who rely on those services the most are at the greatest risk of being left unsupported without congressional action.

Because schools play such critical roles in children’s lives, it is important that school buildings reopen as soon as they can do so safely. However, [we strongly agree with guidance from the American Academy of Pediatrics, American Federation of Teachers, National Education Association, and AASA, the School Superintendents Association](#), which states science must drive the decision to reopen schools. It is important that health experts inform the decision to reopen schools when, and only when, it is safe for their communities to do so. In the meantime, **Congress must fund the programs detailed above that will allow our most vulnerable children to be safe and healthy while they are out of schools, while investing as it has not done in recent memory in a public education system that will need to meet unforeseeable new challenges when it does fully reopen.**