

# *COLORADO*

## Approved State ARP Plan Analysis

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## COLORADO

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In early January, the U.S. Department of Education (ED) approved the final set of state applications for funds under the American Rescue Plan (ARP). This means that every state has received its final tranche of funding and it is now up to states to execute their plans. **We believe there is an important leadership role for states to play in ensuring that funding is directed efficiently, effectively, and equitably.**







Our analysis<sup>1</sup> is based on [guidance](#) co-released by Education Reform Now and nine other education and civil rights organizations and focuses on key sections of the application that have important implications for educational equity:

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<sup>1</sup> This analysis is based on our reading of long, complex state plans which may or may not fully capture how states are using or planning to use ARP funds. In many cases, we made subjective calls about whether states met our specific analytic criteria. Given that these are living documents and that others may interpret state plans differently, we welcome—and in fact are encouraging it through our recommendations—continued discussions about how states are using ARP funds to equitably address the needs of students.



- using data to understand the impact of the pandemic, especially for students from historically disadvantaged groups,
- stakeholder and community engagement,
- investing in evidence-based academic interventions,
- supporting LEAs in the creation and implementation of local plans,
- distributing funds equitably among and within LEAs, and
- publicly reporting uses of funds.

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| Overall Equity Rating:                        |   |   |   |  |
| Commitment to Data and Transparency<br><br> | State-Level Stakeholder Engagement<br><br> | Targeted, Evidence-Based Statewide Investments<br><br> | Funding Equity Protections<br><br> | Guardrails and Supports for Strong District Plans<br><br> |

Colorado’s plan is strong on stakeholder engagement, a commitment to targeting investments to address the needs of students disproportionately impacted by the pandemic, and providing frameworks and guidance for LEA plans. The plan has room for improvement or requires more clarity, however, on investments in mental health and monitoring and oversight of LEA plans.



## PLAN HIGHLIGHTS

### ➔ ***Using Data to Understand the Impact of the Pandemic***

- ◆ Colorado Department of Education (CDE) plans to modernize its current data collection system to make it easier to collect and report data, as well as update security.
- ◆ CDE has provided local education agencies (LEAs) with a suite of supports around understanding the impact of the pandemic including its COVID-19 Learning Impacts Toolkit and an accompanying Equity and Excellence Learning Series.

### ➔ ***SEA Stakeholder Engagement***

- ◆ CDEs engaged in significant stakeholder engagement efforts, conducting two needs inventories in 2020 to help direct state funds for ESSER I and II<sup>2</sup>—which also helped inform its ARP plan—and contracted with Keystone Policy Group to conduct specific stakeholder engagement that included focus groups and stakeholder surveys.

### ➔ ***Addressing Academic Impact of Loss Instructional Time***

- ◆ CDE is creating a new Data & Evaluation Office that will review funding opportunities offered via state ESSER funds, evaluate outcomes of investments, and share best practices.
- ◆ CDE has identified specific data it plans to use to target its ARP investments and, any subgrants will be prioritized based on those targeting students disproportionately impacted by the pandemic.

### ➔ ***District ARP Plan Requirements***

- ◆ LEAs must explain how their investments will address the disproportionate impact of the pandemic and specify which student groups will be served by each of its investments.

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<sup>2</sup> Elementary and Secondary School Emergency Relief (ESSER) funds had been allocated in the three federal COVID relief bills. ESSER I and II are from the bills passed in 2020, while ARP (or ESSER III) was passed in 2021 and is the subject of this analysis.



### **SEA Support of LEAs**

- ◆ CDE's COVID-19 Learning Impacts Toolkit includes clear guidance around doing root-cause data analyses to determine how to equitably target investments.
- ◆ CDE is partnering with Marzano Research to develop program evaluation training modules to support LEAs in evaluating the effectiveness of ESSER investments.



### **AREAS OF CONCERN**

#### **Lack of SEL/Mental Health Investments**

- ◆ Student mental health issues are included as a part of the linked Equity and Excellence Conference Series that occurred in Summer 2021, but social emotional learning and mental health are barely mentioned throughout CO's ARP plan.

#### **Fiscal Equity**

- ◆ While CO provided LEAs with needs assessments templates and guidance, the state has no specific requirements around the distribution of funds within LEAs as a part of its local plan template.

#### **Oversight of District Plans**

- ◆ Though CO has generally strong district plan requirements, given the state's large number of districts and a lack of clarity around the LEA plan review process, we're concerned that CDE doesn't have the internal capacity to ensure district plans are high-quality, equitable, and implemented with fidelity—something we're concerned about in states across the country.

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## KEY INVESTMENTS

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- 🔑 Supplementing the funding provided by state law to increase access to high-impact tutoring across the state.
- 🔑 Expanding funding for existing "Empowering Action for School Improvement" Grants which provide support to districts' working to develop their continuous improvement systems.
- 🔑 Allocating funds to districts, BOCES, and Tribal Nations that were not eligible for ESSER funds but still have high proportions of at-risk students.
- 🔑 Developing programs to increase the teacher workforce and mentorship programs to increase retention.
- 🔑 Creating new CTE programs, with a focus on rural districts—something identified through stakeholder engagement as a crucial need to re-engage students.

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## RECOMMENDATIONS FOR STATE ADVOCATES AND POLICYMAKERS

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- #1 Work with state department of education officials to make revisions to their ARP state plans.** While the state's plan is already approved by ED, the plan is intended to be—and given the limited information it contains, must be—a living document. Advocates should offer recommended changes to the plan based on the best practices and evidence-based interventions, such as those suggested [here](#).



## **#2 Advocate for changes to aspects of state plans that undermine educational equity, while highlighting exemplars.**

We encourage advocates to voice their concerns for these aspects of the state plan—both through direct communication with state officials and via the media to increase pressure to center equity in the state’s investment and support strategy. Advocates should also put pressure on state officials to carefully review district plans and hold LEAs accountable for faithfully implementing evidence-based interventions—a process that isn’t detailed in the state’s plan.

## **#3 Engage community networks to influence the continued development and implementation of local ARP plans.**

Though our review only covers state plans, every LEA receiving ARP funds were also required to create their own plan for spending the latest round of federal relief funds. Given that school districts have wide discretion to spend at least 90% of ARP funds, advocates who effectively engage and mobilize community members and organizations in support of evidence-based interventions for students could have an outsized influence on which policies and programs ultimately get enacted and provide services for students. While district plans have already been submitted to CDE, like state plans, these plans are living documents and many investment decisions have yet to be made or finalized.

## **#4 Pursue increased transparency and stakeholder engagement around state and local spending plans and resulting**

**outcomes.** The public, advocates, and policymakers cannot push for needed changes to state and district ARP plans and interventions if data on plans, implementation, and outcomes are not regularly publicly reported. Therefore, as a part of all advocacy efforts, stakeholders should continually push for additional transparency around both plans and processes for enacting those plans, including a state database of district plans.

## **#5 Encourage continued and improved data collection, reporting, and data-driven decision making.**

The state has made a commitment to use academic and opportunity-to-learn data to inform policy, but advocates must ensure there is a coherent, systemic

plan to use data statewide in service of educational equity. Improvement in state data systems could contribute to better decision making both in the short and (post-pandemic) long term.

