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\(^1\) 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:

\(^1\) 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.

Louisiana’s plan is strong on stakeholder engagement, a commitment to targeting investments to address the needs of students disproportionately impacted by the pandemic, using assessment and learning mode data to determine disproportionate impact, and providing frameworks and guidance for LEA plans. The plan has room for improvement or requires more clarity, however, on a clear plan for evaluating statewide investments, staging of a full and robust set of statewide interventions, and monitoring and oversight of LEA plans.
PLAN HIGHLIGHTS

➡️ Using Data to Understand the Impact of the Pandemic
◆ Louisiana Department of Education (LDOE) provided local education agencies (LEAs) with a mental health screener, and is investing in a Dropout Early Warning data system that will be operational in the 2022-23 school year.

➡️ State Education Agencies (SEAs) Stakeholder Engagement
◆ LDOE conducted feedback surveys around reopening and recovery throughout the pandemic and was currently working on its third version of this survey at the time its plan was submitted. LDOE also conducted focus groups with parents, educators and students and a series of roundtable discussions with superintendents from around the state, which will continue into the next school year.

➡️ Addressing Academic Impact of Loss Instructional Time
◆ LDOE plans to target its SEA funds to address disproportionate impact through the use of assessment and learning mode data, in addition to data provided by LEAs in their local plans.

➡️ District ARP Plan Requirements
◆ LEAs are required to use evidence-based interventions provided in LDOE guidance or provide evidence for alternative interventions which will be reviewed and approved by LDOE.
◆ LEAs are required to track and monitor the impact of their interventions.

➡️ SEA Support of LEAs
◆ LDOE is providing guidance to LEAs and a Student-Well Being Vendor Guide to support social emotional learning (SEL) and mental health and is partnering with LSU to locate and re-engage and re-enroll students.
◆ LDOE has provided guidance to LEAs about analyzing data to determine student needs through an equity lens.
AREAS OF CONCERN

⚠️ Addressing Academic Impact of Loss Instructional Time
- While LDOE does have a clear evaluation plan for its re-engagement initiative, it provides few details about how it plans to track its other investments.

⚠️ SEA Stakeholder Engagement
- Though LDOE had seemingly robust stakeholder engagement, there’s no evidence that it engaged civil rights organizations, a key stakeholder group.

⚠️ Fiscal Equity
- While LDOE plans to target its investments based on student need, it has no specific requirements around the distribution of funds within LEAs as a part of its local plan template.

⚠️ Abdication of State Role
- Though the state has some strong district plan requirements, given a lack of clarity around the LEA plan review process, we’re concerned that LDOE doesn’t have the internal capacity or political will to ensure district plans are high-quality, equitable, and implemented with fidelity—something we’re concerned about in states across the country.
  - This is particularly problematic since most of LDOE’s set-aside will be reallocated to LEAs via subgrants, limiting the state’s ability to develop comprehensive statewide programs to address pandemic impacts on students.

KEY INVESTMENTS

Most of LDOE’s set-aside will be allocated to LEAs through sub-grants, but LDOE does have some statewide investments, including:
Providing grants to LEAs implementing summer programs aligned with state priorities, including high-impact tutoring.

The Accelerate tutoring initiative, including funding and direct support for eight LEAs, as well as grants to other LEAs.

A $1 million initiative to provide educators with access to free teletherapy, and a matching program to increase the number of school social workers around the state.

RECOMMENDATIONS FOR STATE ADVOCATES AND POLICYMAKERS

#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 LDOE, 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.

#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.