

TEXAS

Approved State ARP Plan Analysis

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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 analysis¹ 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 local education agencies (LEAs) in the creation and implementation of local plans,
- distributing funds equitably among and within LEAs, and
- publicly reporting uses of funds.

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

Texas' plan is strong on the use of statewide data to inform state and local learning strategies and a clear plan for monitoring statewide investments. The plan has room for improvement or requires more clarity, however, on stakeholder engagement, providing a strong framework for LEAs' plans, and monitoring and oversight of LEAs' plans.



PLAN HIGHLIGHTS



Using Data to Understand the Impact of the Pandemic

- ◆ Texas Education Agency (TEA) outlines a suite of academic and non-academic data it plans to use to evaluate the impact of the pandemic in the state.
- ◆ TEA plans to provide guidance around mental health needs assessments that LEAs conduct.



Addressing Academic Impact of Loss Instructional Time

- ◆ TEA has a clear plan for evaluating its interventions, including key data sources, and highlights disaggregated data that will be used to identify student needs. It also plans to build a "streamlined diagnostic and application process" to help LEAs identify their unique needs.



State Support of LEAs

- ◆ TEA plans to provide support and guidance to LEAs around maximizing mental health professionals and is building the Safe and Supportive Schools framework to help LEAs assess mental health needs.
- ◆ TEA plans to provide technical assistance around the use of ARP funds to LEAs through 20 regional education service centers.



AREAS OF CONCERN



SEA (State Education Agencies) Stakeholder Engagement

- ◆ TEA provided few substantive details about its stakeholder engagement process and reported that feedback aligned to their priorities, suggesting these efforts were little more than compliance, box-checking exercises.



District Plan Requirements




- ◆ While TEA says it plans to support LEAs in identifying student needs, its district plan requirements don't extend beyond the minimum federal requirements, suggesting a lack of commitment to ensuring strong LEA plans.

- ◆ In addition to having weak district plan requirements, there's a concern that TX doesn't have the internal capacity or political will to ensure district plans are high-quality, equitable, and implemented with fidelity.

Fiscal Equity

- ◆ TEA only provides a one paragraph on fiscal equity, saying it has stressed the "equitable access requirements" of ARP, and the state has no specific requirements around the distribution of funds within LEAs as a part of its local plan template.

KEY INVESTMENTS

-  Providing LEAs with key materials and supports to facilitate the implementation of high-quality, high-impact tutoring programs.
-  Building out a "full suite" of online instructional materials through Texas Home Learning.
-  Providing guidance and technical assistance to district leaders around redesigning the school calendar and school day.

RECOMMENDATIONS FOR STATE ADVOCATES AND POLICYMAKERS

#1 **Work with state department of education officials to make revisions to their ARP state plan.** 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 school district ARP plans. Though our review only covers state plans, every LEA receiving ARP funds was also required to create its 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 TEA, 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. Texas 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.

