



# *WASHINGTON, DC*

## Approved State ARP Plan Analysis

---

**Nicholas Munyan-Penney**, Senior Policy Analyst  
**Charles Barone**, Vice President of K-12 Policy



---

## WASHINGTON, DC

---







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:

---

<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.

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
				

The District of Columbia'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 supports and guidance for local education agencies' (LEAs) recovery efforts. The plan has room for improvement or requires more clarity, however, on the use of district-wide data to inform state and local learning strategies and transparency around district-wide spending plans.





## PLAN HIGHLIGHTS



### ***State Education Agencies (SEAs) Stakeholder Engagement***

- ◆ Office of the State Superintendent of Education (OSSE) conducted 100 virtual meetings with stakeholders occurring from March 2020-June 2021, parent surveys, 23 focus groups, and public roundtables to aid in the development of its state plan.



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

- ◆ OSSE cites specific evidence to support its potential investments and plans to target its learning loss investments to LEAs and schools with its Out of School Time grants to students involved in the juvenile justice system, public/short term housing, and underserved communities.



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

- ◆ LEAs must provide detail of evidence-based practices being used for 20% learning loss set-aside, specific plans to address the needs of English Learners and students with disabilities, and an explanation of expected outcomes and how they will be measured.



### ***SEA Support of LEAs***

- ◆ OSSE is making investments in high-quality interim assessments and mental health screening to aid LEAs in identifying student needs and plans to develop "targeted monitoring plans" for LEAs in need of additional support.
- ◆ OSSE is providing resources around building equitable and inclusive school environments, trauma-informed practices, restorative justice frameworks, and a School Culture and Climate Resource page.
- ◆ The District has developed a citywide Every Day Counts initiative to improve attendance across all LEAs.



## AREAS OF CONCERN



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

- ◆ OSSE's plan to identify pandemic impacts mentions only a few recent data sources—chronic absenteeism and pandemic-era focus groups and family surveys—with most data pre-dating the pandemic or coming from national reports.



### ***Fiscal Equity***

- ◆ While OSSE grants will target schools and LEAs with "greater needs," its plan doesn't mention anything about ensuring LEAs do the same and has no specific requirements around the distribution of funds within LEAs as a part of its local plan template.



### ***Transparency Around SEA Investments***

- ◆ While OSSE mentions a number of potential investments for its SEA set-aside funds, there appears to be little transparency about the process by which OSSE plans to select its final list of investments.

---

## KEY INVESTMENTS

---

OSSE lists a number of potential investments in its plan, including:



Partnering with local nonprofits through Out of School time grants, which will require the use of evidence-based interventions.



Investing in infrastructure supports and grants to schools and CBOs for the development of high-impact tutoring programs.



Expanding access to high-quality instructional materials in non ELA and math subject areas.



Building out supports for schools around culture and climate to re-engage students, with a focus on 9th graders.

---

## RECOMMENDATIONS FOR STATE ADVOCATES AND POLICYMAKERS

---

**#1 Work with Office of the State Superintendent of Education (OSSE) officials to make revisions to their ARP state plan.** While the District'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 District plan—both through direct communication with DC Council and state board of education 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 DC Council and OSSE officials to carefully review district plans and hold LEAs accountable for faithfully implementing evidence-based interventions—a process that isn't detailed in the OSSE's plan.

**#3 Engage community networks to influence the continued development and implementation of LEA 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 LEAs 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 LEA plans have already been



submitted to OSSE, 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 District and LEA 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 District 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 to OSSE's data systems could contribute to better decision making both in the short and (post-pandemic) long term.

