THE STATE OF SUMMER LEARNING GRANTS

An Analysis of States' Use of ARP Summer Enrichment Funds

EDUCATION REFORM NOW

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EXECUTIVE SUMMARY

As a part of the American Rescue Plan (ARP), state departments of education were required to set aside 1% of their funds to support summer enrichment programs, which amounts to a collective $1.2 billion across all 50 states plus Washington, DC and Puerto Rico. These funds are intended to address the disproportionate impact of the pandemic on students' academic, social-emotional, and mental health needs and are separate from set-asides designed to address learning loss and for comprehensive afterschool programs during the regular school year. ARP also allows states to set-aside an additional 2.5% (about $3 billion nationally) in "flex funds'' to support any or all of these activities[1].

This report examines trends in how states are using their summer-specific funds—with a focus on alignment to evidence-based best practices, the targeting of funds, and types of programming—while also highlighting what we see as promising and concerning practices from individual states.

Our analysis—which includes the review of state ARP plans, state department of education websites, and direct communication with state staff—resulted in five key findings:

- **States had an overwhelming deference to local control, resulting in few research-based grant requirements**. For example, just 10 states—Alabama, Arkansas, California, Louisiana, Massachusetts, Minnesota, Mississippi, Utah, Virginia, and Wyoming—have requirements about the length of programs and instructional time that are aligned with best practices, and only five—Arkansas, Connecticut, Louisiana, Mississippi, and Washington, DC—are requiring grant-ees to have research-aligned low staff-to-student ratios.

[1] States can set aside up to 3% for emergency needs, which includes an optional .5% for administrative activities.

- **Grant programs among states have split their focuses between academics and re-engagement.** A plurality of the states with information available are taking a balanced approach to summer programming, providing both academic and enrichment opportunities for students, which generally is what research indicates results in the best outcomes. Additionally, 19 states are requiring grantees to include programming designed to address either social-emotional learning and/or mental health-–with most other states encouraging grantees to include this programming.

- **States are actively working to develop and foster collaboration with community-based organizations (CBOs).** At least 22 states are using some or all of their funds for summer grants to CBOs, including large organizations such as Boys and Girls Clubs and YMCAs, as well as smaller local groups like Oakland Reach. Among those, four states—Arkansas, Georgia, Nebraska, and Washington—are tapping statewide afterschool networks as significant partners, drawing on their expertise and connections with communities and families. Additionally, 15 states are requiring collaboration between districts and local CBOs, with districts and CBOs in Oklahoma and Utah required to jointly apply for funding.

- **Many programs and grants are thoughtfully targeted to serve student groups most disproportionately impacted by the pandemic.** States are taking varied approaches to targeting based on their identified priority populations. For instance, Washington, DC, is prioritizing schools with at least 70% "at-risk" students; while Nebraska created a map to identify areas of the state most in need by combining data on schools identified for support and improvement under ESSA, COVID cases, and the CDC's social vulnerability index; and Missouri modified state funding rules to incentivize rural districts to apply for grants.

- **State departments of education are feeling rushed and overwhelmed as they develop and implement their investments.** Departments have limited capacity and have faced bureaucratic delays at the state and federal levels that have shortened planning time. As a result, states generally haven't engaged in additional stakeholder engagement beyond state plan requirements to ensure programming meets the needs of communities. And few states have proactively focused on or planned for the reporting and evaluation of summer programming, which is critical for continuous improvement and demonstrating the student impact of federal relief funds.

Based on these findings, we have a set of five recommendations for federal, state, and local policymakers and advocates to push for high-quality summer programming and robust reporting and evaluation of programs in support of programmatic improvements and fiscal sustainability over the remaining two summers of ARP funding and beyond.

RECOMMENDATIONS

1. **Advocates and policymakers should push for increased transparency into how state departments of education are using their state reserve funds,** both for summer enrichment, as well as afterschool programs, and to address learning loss.

2. **State officials should engage current summer grantees, as well as students and families,** to inform improvements to program guidelines and grant processes in subsequent years.

3. **Advocates and policymakers should urge state department officials to develop and publicize the specific planned impacts of their summer and other ARP investments,** including which outcomes will be measured and how they plan to evaluate programs based on this information.

4. **State officials and policymakers should work together to invest in increased capacity** within state departments of education.

5. **State officials and policymakers should engage in proactive conversations** to begin considering the sustainability of funding and

INTRODUCTION

In March 2021, congressional Democrats and President Biden passed the American Rescue Plan (ARP), which provided $122.7 billion to states and districts to address the needs of students and schools as result of the disruptions caused by the pandemic. States were required to submit their plans for their portion of the funds—10% total, across several categories, of each state's allocation—as well as their expectations and support for districts, who were allocated the remaining 90% of funds.

In January, ERN released a review of all state plans, Driving Towards Equity, which found that while there were some bright spots, generally states were abdicating their role of providing strong guardrails and monitoring districts' uses of funds and provided few details about how they would be investing their own funds.

This report follows up on those findings, digging deeper into how states plan to use the portion of their state reserve funds dedicated to summer enrichment. As a part of ARP, states are required to spend one percent of the state's total allocation on providing summer enrichment activities to address the disproportionate impact of the pandemic on students' academic, social-emotional, and mental health needs.

Based on research from the Annenberg Center at Brown University and the National Summer Learning Association, as well as the second edition of the US Department of Education's COVID Handbook, we have identified a set of best practices for summer learning programs to center our analysis. Specifically, we were looking to see states require recipients of summer enrichment reserves funds to develop or expand summer programming that:

- Remove barriers to participation by providing free transportation and meals;
- Provide at least three hours of daily academic instruction over the course of at least five to six weeks;
- Have small group sizes, with a maximum 1:15 staff-to-student ratio;
- Use curriculum that aligns with school-year instruction and state standards;
- Have an instructional staff of effective teachers with subject and grade-level experience;
- Provide enrichment activities, such as art, music, or athletics;
- Focus on relationships and address mental health & social-emotional learning;
- Engage with families to develop and publicize programs;
- Partner with community-based organizations for wrap-around services and/or enrichment activities; and
- Conduct frequent assessment and evaluation for continuous improvement.

Additionally, we investigated how states were planning to target their grant programs to address the disproportionate impact of the pandemic on their specific student populations, as well as any requirements for grantees around the targeting of their programming. Finally, we looked for innovative and unique approaches to using these funds.

The resulting findings, rather than providing an exhaustive analysis of all state programs, provide an overview of state trends and highlight what we view as the best (and worst) practices within states' existing and planned programs.

SUMMER SUPERLATIVES

Among the trends, innovations, and best practices we've identified across states' investments in summer enrichment programs, a few rose above the rest:

Best Overall Program: Arkansas

Across all of the aspects of summer programs we focused on in this report, Arkansas was the most consistent in meeting best practices. Grantees are required to meet nearly all research-based program requirements, and the Arkansas Department of Education (ADE) is actively working with grantees to meet best practices in the areas without requirements. ADE is also strategically targeting grants to CBOs serving rural districts and those with high proportions of students from low-income families, and leveraged the state's afterschool network to engage stakeholders to plan the grants. Finally, ADE has set clear expectations for grantee self-evaluation, while working with a high-quality external evaluator for its own evaluation.

Most Innovative Grant Targeting: Nebraska

While many states have made thoughtful, intentional targeting decisions for their summer learning grants, Nebraska took a unique approach that went beyond traditional educational data. In order to determine communities of focus for summer learning, the Nebraska Department of Education (NDE) created a statewide map that included schools identified for support and improvement through the state's accountability system, COVID cases, and the Center for Disease Control's social vulnerability index, which measures the extent to which communities need support to respond to crises. Together, these metrics allowed NDE to target grant funds based on a holistic measure of needs that included school, community, and pandemic-specific data.

Most Active Use of State Leverage: Louisiana

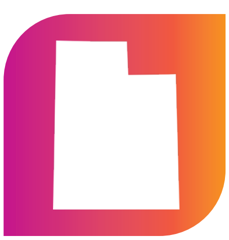
Early in the pandemic, Louisiana quickly identified high-impact tutoring (HIT) as one of its key strategies for addressing unfinished learning opportunities. As a result, the Louisiana Department of Education (LDOE) has heavily invested in providing tools and guidance on the implementation of HIT. The state tapped its teacher leader network to develop an entire year's worth (school year and summer) of tutoring curriculum aligned with widely used school curricula and provided clear, research-based program guardrails for districts. While LDOE opted to allocate its ARP summer reserve funds to LEAs via formula grants (a practice we recommend against), its requirement that all K-8 schools identified for support and improvement via the state's accountability system provide tutoring aligned with state expectations over the summer, ensures that many of the state's highest-need students have access to effective tutoring programs outside the regular school year.

Most Comprehensive Evaluation Plan: Connecticut

More than any other state, Connecticut has taken a proactive approach to the evaluation of its ESSER investments through the creation of the COVID-19 Education Research Collaborative, a partnership between the Connecticut State Department of Education (CSDE) and local universities. The Collaborative's first evaluation was of its use of ARP funds in summer 2021. This evaluation was developed and published in time to inform both CSDE's revised grant requirements for this summer and continuous improvement of individual programs. CSDE plans to further develop its capacity to evaluate its ARP summer programming by collecting student-level data from programs this summer in order to link these data to school data on enrollment and attendance.

Most Complementary Summer Programming: Massachusetts

Rather than investing in a single program, Massachusetts opted to develop two programs—one focused on CBOs and the other on Local Education Agencies (LEAs)—with a vision of creating comprehensive, year-round supports for students. Its CBOs-focused investments combined funds from the ARP afterschool and summer reserves and leveraged the state's largest CBOs as sub-grantmakers to help encourage smaller organizations to apply. The LEA-focused program similarly leveraged existing state infrastructure by expanding an existing summer learning grant program, infusing significantly more funds and shifting its focus from a traditional summer school model to one that features more expanded hours and programming as well as wrap-around services for students and families.



Most Innovative Grant Structure: Oklahoma and Utah

A number of states have seized ARP summer reserve funds as an opportunity to develop partnerships between LEAs and CBOs by requiring CBO grantees to coordinate with LEAs or vice versa. However, Oklahoma and Utah have taken this a step further by requiring joint applications from CBOs and LEAs as a way to more fully integrate their efforts to address student needs. Utah is even evaluating programs partially on the successful development of these partnerships. Both states have also combined their summer and afterschool reserves, therefore facilitating both year-round and joint school-community supports in a single program.

FINDING 1 ➔ DEFERENCE TO LOCAL CONTROL RESULTS IN FEW RESEARCH-BASED GRANT REQUIREMENTS

The most noticeable trend in states' use of their summer reserve funds was a strong deference to local control. While we appreciate that states should leave some decisions to local stakeholders, the unfortunate result here was relatively few specific requirements for summer programming, even in cases where best practices are clearly and convincingly grounded in evidence. This is particularly acute in a handful of states including **Arizona, Florida, Illinois, Maryland, Michigan, Misssouri, New Jersey, New York, Pennsylvania,** and **West Virginia** that simply allocated their entire summer reserve to districts with little to no requirements for programming beyond basic federal compliance, like addressing the disproportionate impact of the pandemic.

Additionally, states including **Colorado** and **Ohio** have created grant programs that allow for a vast array of summer programming, effectively eliminating their states' ability to implement meaningful program guardrails. Meanwhile, **New Hampshire** is sending funds directly to summer camps based on the enrollment of eligible students with disabilities and students from low-income families without any vetting of camps beyond the state's basic safety and other licensing requirements. And confoundingly, **West Virginia** actually had a number of requirements for summer learning under a program funded by ESSER II funds, but removed them for their ARP reserve funds (aka ESSER III).

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Few States Lowering Barriers to Participation

When it comes to lowering barriers to participation, we know it's critical that students have access to free transportation and meals. Only five states—**Mississippi, Montana, Oregon, South Dakota,** and **Vermont**—confirmed they are mandating transportation to all programming. Despite this, only these same five states, plus **California**, have requirements on providing healthy meals or snacks.

Another set of states, though, are at least cognizant of the importance of meals and transportation for summer learning. **Arizona, Massachusetts, Minnesota, North Carolina,**

Ohio, Oklahoma, Washington, DC, and **Wyoming** all have plans to work directly with recipients of summer reserve funds to provide guidance and technical assistance to ensure students have access to meals and transportation, including advice on leveraging other federal programs, and **Connecticut** and **Georgia** are prioritizing funding for grantees that lower barriers to attendance in this way. However, without specific requirements, these states cannot guarantee that all participants will have access to these services vital to full summer learning participation.

Limited Alignment with Best Practices for Length of Programming and Staffing

Research suggests that summer learning should include full-day programming over the course of at least five to six weeks, with about three hours per day devoted to core academic instruction and the rest open for enrichment activities such as sports, recreation, arts, and music. Despite this, only 16 states have outlined that summer reserve grantees provide any academic instruction dosage requirements, with 10 of these—**Alabama, Arkansas, California, Louisiana, Massachusetts, Minnesota, Mississippi, Utah, Virginia,** and **Wyoming**—providing requirements aligned with best practices and three—**Connecticut, Georgia**, and **Vermont**—giving a competitive priority to grantees with longer programming.

Summer learning is also most impactful when staffed by effective teachers who have appropriate subject and grade-level experience, with instructional activities in groups of no more than 15 students. Yet, only 17 states confirmed any specific staff qualification requirements, and only six—**Alabama, Arkansas, Louisiana, Montana, North Carolina,** and **Washington DC**—were aligned with best practices. And just five states—**Arkansas, Connecticut, Louisiana, Mississippi**, and **Washington, DC**—are requiring grantees to have staff to student ratios at or below 1:15. A number of other states are requiring grantees to outline their staffing plans, including **Vermont**, which is also notably requiring grantees to explain how their staff will reflect the demographics of their student population.

Given widespread reporting on school staffing shortages across the country, coupled with unprecedented levels of educators feeling overworked and overwhelmed, it's not surprising that many states are opting not to have strict staffing and dosage requirements. In interviews with state officials, some mentioned that they worried these requirements would deter potential grantees from applying, while others were concerned that it would limit the ability of programs to scale up to meet the high demand for services.

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To help address these concerns, some states are working with districts and other grantees to provide alternative options for high-quality staff. **Arkansas**, for instance, is providing summer learning providers with access to the state's tutoring corps—which was developed with other ESSER funding and has over 1,000 tutors recruited and trained by the state—to help staff summer academic interventions. And **West Virginia** is working with districts to help them staff programs with teacher candidates from the states' colleges and universities.

FINDING 2 → STATES SPLIT FOCUS BETWEEN REENGAGEMENT AND ACADEMICS

Best practices for summer programming include providing a balance of academic and enrichment activities, in order to fully engage students in learning while also providing students with opportunities for recreational activities and non-traditional learning experiences. A plurality of states' grant programs (14) are focused on providing students with a balance of both academic and enrichment activities in summer programming. Ten states are explicitly focused on academics and nine on enrichment, while another six are allowing grantees to decide how to concentrate their programming.

Beyond this basic content focus, grantees have been given lots of leeway when it comes to the type of programming they offer, which makes sense. Ideally, summer programming is tailored to the specific needs and interests of students. Accordingly, we know at least 15 states—**Arizona**, **Arkansas, Kansas, Kentucky, Michigan, Minnesota, Nebraska, New York, North Dakota, Oklahoma, South Carolina, Tennessee Virginia, Washington**, and **Wyoming**—are requiring recipients of summer reserve funds to complete community needs assessments in order to gain understanding of how best to serve students. Similarly, three states—**Alabama, Florida**, and **Louisiana**—are requiring the use of state academic assessments to target programming and instruction, and another five—**Colorado, Georgia, Indiana, North Carolina**, and **Washington, DC**—are requiring grantees to identify specific data they are using to tailor programming to meet the needs of students.

Lack of Academic Guardrails

Despite the importance of flexibility to ensure programs are meeting student needs, there are certain research-based guardrails that are important to ensure students are getting access to the content needed to accelerate learning: curriculum aligned to both school-year curriculum and state academic standards, as well as the use of high-quality instructional materials (HQIM). However, very few states are taking these steps. Just five states—**Arkansas, Maryland, Missouri, Ohio, and Utah**—have explicitly stated that summer curriculum must be aligned with school-year curriculum, with **Missouri** also requiring alignment with the science of reading. Similarly, only **Louisiana** and **Washington, DC**, are explicitly requiring the use of HQIM. **Louisiana** is actually going a step further, providing tutoring content—designed by teacher leaders in the state—for districts to use in the summer.

Strong Focus on Social-Emotional Learning and Mental Health

Providing a welcoming environment and an explicit focus on relationships are foundational parts of high-quality summer programming, and are even more important now, given the collective trauma students have experienced since the beginning of the pandemic. It was encouraging to see, then, that 19 states are requiring that their grantees include programming designed to address either social-emotional learning and/or mental health. In **Massachusetts,** for instance, districts must show how their programming creates a culturally responsive, anti-racist, and welcoming environment. And **New Hampshire** is partnering with the NH Community Behavioral Health Association to provide training for summer camp staff and have their counselors available on site for all participating camps at least once a week.

FINDING 3 → STATES LEAN IN ON WORK WITH COMMUNITY-BASED ORGANIZATIONS

One especially encouraging trend among states' use of their ARP summer reserve is granting funds to CBOs. In many states across the country, CBOs have long played a critical role in providing high-quality afterschool and summer programs—such as through 21st Century Community Learning Centers—and state DOEs are leaning on these organizations to leverage their expertise and connections to the community, while also lessening the burden on overwhelmed school district staff.

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At least 22 states are using some or all of their funds for summer grants to CBOs. Among those, five states—**Arkansas, Georgia, Nebraska, South Carolina,** and **Washington**—are tapping statewide afterschool networks as significant partners. **Vermont** is doing the same thing with ESSER II funds, while **Massachusetts** has granted funds to a few statewide CBOs.

As a part of these partnerships, states are issuing their set aside funds to the networks, which then facilitate sub-granting to CBOs throughout the state while also providing guidance and technical assistance around programming and evaluation to these sub-grantees. Additionally, working through these networks and larger organizations may help attract smaller CBOs that might be intimidated to apply for grants directly from states—including those focused on specific, disproportionately impacted student groups.

Leveraging Partnerships Between Districts and CBOs

District-community partnerships have a number of important functions, including engaging with students and families that have been disconnected from schools during the pandemic, providing additional enrichment opportunities for students beyond what schools can offer, and aligning academic content with what students are learning in class throughout the school year.

Encouragingly, 14 state departments—**Arkansas, Colorado, Delaware, Kansas, Kentucky, Maine, Massachusetts, Mississippi, Ohio, Oklahoma, Oregon, Tennessee, Utah** and **Wyoming**—are requiring collaboration between districts and local CBOs, with districts and CBOs in **Oklahoma** and **Utah** actually required to jointly apply for funding. An additional 13 are encouraging these partnerships, with staff in **Arizona, Georgia**, and **Minnesota** actively working to facilitate collaborations.

For instance, the **Georgia** Statewide Afterschool Network is providing resources and trainings to build and develop partnerships between schools and CBOs, and **Ohio** CBOs are required to partner with at least one school or LEA to ensure alignment of programming with school curriculum. Similarly, in **North Carolina's** career accelerator program, grantees need to partner with local companies to ensure quality, work-based experiences for students. However, one state—**Missouri**—has explicitly told districts not to collaborate with CBOs, limiting interactions to information-sharing about services.

Some states have also gone a step further in providing comprehensive year-round out of school services for students, by creating grant programs that combine states' ARP reserves for summer and afterschool into a single grant program. Nine states—**Colorado, Delaware, Indiana, Massachusetts, Ohio, Oklahoma, South Carolina, Utah,** and **Wyoming**—have decided to structure their grant programs in this way.

Given that many afterschool program providers also serve students during the summer, doing so will likely make the planning and delivery of services easier for staff, while lowering barriers to student access. **Ohio**, though, may be limiting the potential benefits of this program by requiring CBOs to complete applications for summer and afterschool funds separately, increasing the burden on CBOs, particularly smaller organizations with limited administrative capacity.

District-community partnerships have a number of important functions, including:

- *Engaging with students and families that have been disconnected from schools during the pandemic;*
- *Providing additional enrichment opportunities for students beyond what schools can offer; and*
- *Aligning academic content with what students are learning in class throughout the school year.*

FINDING 4 ➔ THOUGHTFUL TARGETING OF FUNDS AND PROGRAMMING

Many states are taking a thoughtful and deliberate approach to grantmaking by:

- *Prioritizing grant funds to districts and organizations that serve large proportions of disproportionately impacted students,*

or

- *Building programs specifically designed to address the needs of certain student populations.*

In addition to investing in quality, evidence-based programming, targeting investments to the students most in need of supports is the most important factor in ensuring an equitable recovery from pandemic disruptions to learning. Fortunately, we're seeing many states taking a thoughtful and deliberate approach to grantmaking, prioritizing grant funds to districts and organizations that serve large proportions of disproportionately impacted students or building programs specifically designed to address the needs of certain student populations.

Targeted Grant Priorities

Ten states—**Arkansas, California, Delaware, Massachusetts, Montana, New Hampshire, New Mexico, Rhode Island, Utah** and **Washington, DC**—are prioritizing grants or services to students from low income families, such as **Washington, DC**, which is prioritizing schools with at least 70% "at-risk" students, and **Arkansas**, which prioritizes CBOs serving districts that have student populations with least 50% students from low-income families.

Five states—**Louisiana, Massachusetts, Nebraska, Ohio**, and **Washington, DC**—are focused on the lowest performing schools, with priority funding for schools identified for support and improvement under the federal Every Student Succeeds Act (ESSA). **Louisiana**, which issued formula grants to LEAs, is requiring identified K-8 schools to provide HIT following the state's guidelines and using their provided HQIM, while **Nebraska** created a map to identify areas of the state most in need—and therefore a priority for funding—by combining data on ESSA-identified schools, COVID cases, and the CDC's social vulnerability index.

States have also identified rural students as a key focus area for summer funds, citing a lack of available out-of-school time services in these areas. Twelve states—**Arkansas, California, Colorado, Georgia, Maine, Missouri, New Mexico, North Dakota, Ohio, Utah, Vermont,** and **Washington**—are prioritizing funds for grantees in rural areas. A number of states are also designing their grant programs to incentivize rural applicants. **Missouri**, for instance, modified state funding rules to allow rural districts to apply for summer learning grants without losing access to general state funds, something many districts cited as a barrier to applying in 2021. Similarly, **New Mexico** decided to issue grants for its summer internship program to tribal and county governments, rather than school districts because stakeholder engagement indicated this would allow for more access for rural communities.

Targeted Programming

A number of states are also using some or all of their summer reserve funds to supplement district-run summer learning with programs focused on specific students. For instance, both **Alabama** and **Washington, DC,** have programs focused on early learning. Other states are focused on transition grades, such as **Oregon**, which has a program focused on transition services for kindergarten, and **North Carolina,** which is targeting the three main transition grades of kindergarten and grades 6 and 9.

A few states have focused on the specific needs of students with disabilities. **Oregon's** program mentioned above has made continuity of services a key priority of its kindergarten program, while **Kentucky** has focused its attention on supporting the transition for students with disabilities into postsecondary opportunities, and **New Hampshire** is providing direct payments to participating summer camps based on parent choice.

Also notable, **Washington** worked with its afterschool network partner to ensure the vast majority of funds were allocated to CBOs that work specifically with BIPOC students, and **New Mexico** worked directly with tribal governments to ensure internship opportunities were available to native students. **Vermont** has also developed a summer program—though funded through ESSER I—that is providing targeted programming and mentorships to Afghan refugee students in collaboration with refugee-focused non-profits in the state.

FINDING 5 → STATE DEPARTMENTS OF EDUCATION FEEL RUSHED AND OVERWHELMED

One of the dominant narratives in the news focused on COVID relief funding for schools has been that states and districts are not spending these funds quickly enough given the urgency of student needs. In our communications with state departments of education, we consistently heard that state officials are feeling this pressure but are attempting to balance these concerns with developing investments that will both make an impact for students and are sustainable. They also face capacity limitations and bureaucratic hurdles beyond their control.

Delayed Development of Summer Programming

A common refrain we heard from states was that the federal approval process for their ARP plans significantly delayed the development and implementation of their summer programs. States were, understandably, hesitant to devote their limited capacity to fully developing programming until it received federal approval, likely focusing instead on spending down earlier rounds of federal relief funding.

So even though two-thirds of funds were available immediately to states in the spring of 2021, it seems most states didn't begin planning in earnest until their plans were approved in late summer or early fall of 2021. One state—**Wisconsin**—is again awaiting approval of their state plan after USDOE flagged a provision passed by the state legislature as violating the law's requirement to address the disproportionate impact of pandemic in the state.

Many states—including **Michigan, North Carolina, Vermont**, and **Washington**—were also dependent on state legislatures to allocate funds to specific programs in accordance with state law. As a result, state-funded summer programs in 2022 are still being funded by ESSER I or II. That's the case in **North Carolina**, where their summer bridge and career accelerator programs won't be funded by ARP until 2023, and in **Michigan**, where the legislature appropriated funds for summer school from their remaining Governor's Emergency Education Relief (GEER)[2] funding for 2021 and 2022 while districts work with the state to finalize their district plans for ARP funds.

In other states, it's not clear that any summer learning will be supported by ARP relief funds this year—though these states could be using earlier rounds of funding to support summer learning. **Kentucky's** planned summer reserve programming is still in the development phase with no clear start date. **California** recently launched its grant application for its summer reserve, with applications due in late June, and **Wyoming** similarly just announced their summer learning grant program, and the application is yet to be released. While it's possible that grantees may be able to get reimbursed for 2022 programming, it's not clear how many potential grantees would be willing to take that risk, in case they aren't approved for funding.

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Rushed Rollout Resulted in Little Stakeholder Collaboration

With states feeling rushed to develop and launch programming funded by their summer reserve funds, seemingly one of the first things to go was robust stakeholder engagement. Twenty-one states—**Alabama, Illinois, Indian, Kansas, Louisiana, Michigan, Minnesota, Mississippi, Missouri,**

[2] GEER funds were provided to state governor's' offices directly to address the state's education needs as part of the first two waves of pandemic relief funding, Coronavirus Aid, Relief, and Economic Security (CARES) Act ($3 billion) and Coronavirus Response and Relief Supplemental Appropriations (CRRSA) Act ($4 billion).

New Hampshire, North Carolina, North Dakota, New York, Oregon, South Carolina, Utah, **Vermont, Virginia, Washington, Washington, DC** and **Wyoming**—admitted to doing no specific engagement for the development of their summer programming or said they were largely relying on grantees to conduct stakeholder engagement at the local level. While states were not required to engage in stakeholder engagement for specific programs within ARP—requirements were just for full state plans—we hoped states would be engaging in these efforts to ensure state programs were meeting the needs of students, communities, and potential grantees.

Among these states, some were acutely aware of the lack of state-level engagement and consciously built in grant structures to ensure local engagement or are planning for additional engagement to refine programs. For instance, **Oregon** is planning a family survey to support continuous improvement in the coming year while providing LEAs with a community engagement toolkit to support this work, and **Wyoming** grantees will need to conduct community consultation, have a local advisory council, and complete an asset mapping process as part of program development.

Encouragingly, fourteen states—**Arizona, Arkansas, California, Colorado, Connecticut, Georgia, Kentucky, Massachusetts, Nebraska, New Mexico, Ohio, Oklahoma, Rhode Island,** and **West Virginia**—said they did conduct at least some stakeholder engagement specific to the development of summer programming. Both **Georgia** and **Nebraska**, for instance, stated they worked intentionally with their afterschool network partners, taking advantage of their community contacts to develop grant programs and applications reflecting the needs of communities and potential grantees. **Massachusetts** leveraged a group of practitioners from schools and CBOs focused on summer and afterschool programming that had been meeting throughout the pandemic and as a result decided to focus one grant specifically to CBOs, who reported struggles accessing relief funding.

Limited Advanced Planning Around Reporting and Evaluation

Perhaps the most concerning trend in our research of states' use of summer reserve funds was the lack of planning focused on the reporting and evaluation of summer programming. Seventeen states—**Alabama, Colorado, Kansas, Kentucky, Louisiana, Massachusetts, Michigan, Minnesota, Missouri, Nebraska, New Hampshire, New Mexico, North Carolina, Ohio, Oregon, Virginia,** and **Wyoming**—explicitly stated that their plans for evaluation were still in the early stages of development. Even more alarming, **Illinois** said it would simply be complying with minimum federal requirements, none of which involve evaluating programs, and **California, Mississippi, North Dakota, Vermont,** and **Washington** indicated no plans to do state-level evaluations beyond compiling grantee collected data.

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Part of the challenge here stems from the complexity of evaluating very diverse summer programming within states and tracking a variety of possible outcomes. For instance, twenty states—**Arizona, Arkansas, Colorado, Florida, Georgia, Kansas, Massachusetts, Minnesota, Missouri, Montana, New York, North Carolina, North Dakota, Ohio, Oregon, South Carolina, Utah, Vermont, Washington, DC** and **Wyoming**—are relying, at least partially, on grantee defined program goals for success. Grantee defined goals are critical to inform continuous improvement of individual programs and to ensure programs are meeting locally-defined needs, especially when goals are clear and measurable. However, these disparate goals will be difficult to use to determine the statewide impact of investments, particularly for states like **Colorado** and **Ohio** that are supporting a wide range of programming under a single grant.

Given that many of these programs will be funded for multiple summers through the deadline for spending ARP funds—ARP funds can cover programming in Summer 2022, 2023, and 2024—a focus on continuous improvement will be essential to improving student outcomes. As noted above, many states are requiring grantees to develop and track their own goals, but some states are taking additional steps to improve grants and programming. For instance, in **North Carolina**, the state is grouping LEAs into cohorts for additional support and the SEA plans to convene all districts to review data, identify best practices across the country and within the state, and devise advocacy strategies for sustainable, continued investments.

Connecticut arguably has the most developed evaluation plan of all states, working with the University of Connecticut to evaluate its summer programming as a part of its ESSER funded COVID-19 Education Research Collaborative, which includes many local university partners. The state already released a summer 2021 evaluation, which helped inform changes for 2022, including the requirement of outdoor activities, and the state is working to include student-level data this year to better understand the impact of summer programming on student engagement and attendance.

Minnesota, meanwhile, is focusing continuous improvement efforts on its grantmaking processes. After discovering disparities in the size of, and student populations being served by, grantees receiving afterschool grants, the state wanted to develop a more equitable grantmaking process. So in addition to using this summer to refine program requirements with a small group of grantees, the state plans to work with grantees to get feedback on the grantmaking process itself to help level the playing field in future years.

RECOMMENDATIONS

Based on the above findings, as well as the research process itself, we've developed a list of recommendations for state and local officials, policymakers, and advocates, with the goal of improving programming and driving impacts for students, particularly those most impacted by the pandemic.

Advocates and policymakers should push for increased transparency on how state departments of education are using their state reserve funds, both for summer enrichment as well as afterschool programs and to address unfinished learning. In researching this report, few states had concrete details about how they were spending their state reserve funds in their ARP plans or on the state website, and much of the information available was not easily accessible. **Oregon** has a document that clearly explains the programs being funded by each portion of the state's reserve funds. To improve transparency and engage stakeholders, advocates should work with state officials to develop strategies to proactively share information with policymakers and community members about investments. While the US Department of Education is requiring extensive reporting, the public release of these data will likely be far too late to provide anything beyond a post-mortem look at how states used their funding.

> *"The public release of federal data will likely be far too late to provide anything beyond a post-mortem look at how states used their funding."*

State officials should engage current summer grantees, as well as students and families, to inform improvements to program guidelines and grant processes. Given that many summer grant programs are just in their first year, states still have ample time to refine programming or grant requirements before grantees apply for additional years of funding or new grantees join. As mentioned above, **Minnesota** is engaging in this process, connecting directly with grantees for insights and recommendations. States may also consider following the lead of states like **Arkansas, Georgia, Nebraska**, and **Washington** to leverage their afterschool networks to develop and refine their

their investments. States should also consider using this as an opportunity to build in more research-based requirements for summer programming, without placing undue burden on existing grantees.

Advocates and policymakers should urge state department officials to develop and publicize the specific planned impacts of their summer and other ARP investments, including how they will be measured. Unlike the more unrestricted funds from the first two rounds of federal relief funding that were largely intended to address issues of health and safety, the state summer reserve funds—and other ARP funds—are specifically intended to address the academic and mental health impact of the pandemic. As a result, states need to determine their desired impacts and set clear plans for collecting, analyzing, and communicating actual impacts.

State officials and policymakers should work together to invest in increased capacity within state departments of education. As noted above, many state departments are feeling overwhelmed and lack the capacity to effectively develop and evaluate state-level ARP investments while also monitoring and enforcing districts' use of funds. States should consider using some of their reserve funds to hire additional staff to address capacity needs or work with policymakers to allocate additional funds for this purpose. **Colorado,** for instance, recently hired a new staff member to focus on the evaluation of ARP programming. Alternatively, states could opt to contract out ARP specific services to avoid adding to long-term staffing costs.

State officials and policymakers should begin engaging in proactive conversations to consider the sustainability of funding and programming. While many programs are just ramping up, the sunsetting of relief funds in 2024 means a potential fiscal cliff is looming. Using evaluative and other data, states should determine the extent to which ARP funded summer programs should continue based on student and community needs and begin looking for ways to leverage and/or weave recurring federal funding streams as well as state budgets to ensure students don't lose access to effective services when ARP funds dry up.

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APPENDIX: METHODOLOGY

Our team worked to collect as much information as possible from all 50 states and Washington DC on how they are using, or plan to use, their 1% summer reserve funds from ARP. We gathered our information from three sources. First, we reviewed the section of all state approved ARP plans dedicated to the set aside (Section D-2). Next, we reviewed each state's department of education website for more detailed, up-to-date information on how states planned to use these funds. Finally, we contacted staff at each department to gain additional insights that could not be gleaned from publicly available information, using a standard questionnaire for each state, which asked questions about programming requirements, targeting of funds, community and family engagement, and reporting and evaluation. During this final step, some states connected with our team via zoom or phone to discuss our questions, while other states responded to our questions in writing.

Citing limited state capacity, Delaware and Texas declined to provide information beyond what was available, while Florida, Hawaii, Nevada, New Jersey, New York, Pennsylvania, South Carolina, and Wisconsin did not respond to our inquiries. Another handful of states—Iowa, Maryland, Montana, and Tennessee—responded to our inquiries but, due to limited capacity, were unable to provide additional details, and three states—Idaho, Maine, and South Dakota—responded with some additional information on their programming, but did not provide answers to all of our specific questions. Given the myriad demands state departments of education are currently facing, we tried to be as flexible as possible but understand that some states were unable to spare staff time to respond to our questions.

Since a large number of states were unable or unwilling to respond to our questions, our team opted to approach this report as an opportunity to highlight general trends across the country, as well as what we see as both promising and concerning individual state practices. However, this should not be viewed as an exhaustive look at state programs. We have also avoided overall ratings of individual states on their funding decisions, in contrast to our "Driving Towards Equity" report earlier this year.

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