A COVID-19 Relief Dollars Process Guide
Seizing the Potential of Once-in-a-Lifetime Federal Education Spending

Michigan State University Office of K-12 Outreach
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Introduction: The Purpose of this Process Guide
Understanding this paper's role in the broader context of COVID-19 and federal funding

Since March 2020, nearly everyone in the K-12 ecosystem has grappled with the effects of COVID-19. Educators have adapted the delivery of their curriculum. Families have considered what childcare, work, and student learning entail when schools are intermittently shuttered. Education leaders have been asked to provide not just access to academic instruction but also to technology, social services, community engagement, and social-emotional learning.

Along the way, researchers have tied these challenges to student learning losses worth months of missed instruction, widened achievement gaps, heightened dropout rates, and worsened student mental health (Dorn et al., 2021; Engzell et al., 2021; Hatch & Harbatkin, 2021). In recognition of these challenges and the generational effects of COVID-19, the federal government allocated almost $200 billion to K-12 education in three bills, which are featured below, from March 2020 to March 2021 (Addonizio, 2021).

> **This paper … outlines a process for how district and school leaders might decide how to spend resources**

Coronavirus Aid, Relief, and Economic Security (CARES) Act **~$13 billion**	Coronavirus Response and Relief Supplemental Appropriations (CRRSA) Act **~$54 billion**	American Rescue Plan (ARP) Act **~$122 billion**

This unprecedented influx of federal funds has not gone unnoticed. Think tanks, news outlets, and advocacy groups have broadly disseminated articles, op-eds, and white papers with their takes on how districts can best help students and staff return to in-person learning and realize a new normal (Buher & Ramirez, 2021; French, July 2021; Arsen & Addonizio, 2021). Concurrently, a cottage industry of consultants, curriculum designers, and private firms have emerged to offer their services. Many of these vendors have economic incentives to sell their approaches independent of whether they prioritize specific student needs or account for local conditions. Hence, there is a risk of a mismatch emerging between district-selected measures and the type of investments that Congress hoped education leaders would select to overcome the pandemic's effects.

This paper recognizes both the potential for mismatched interests and the fact that the Office of K-12 Outreach cannot know district conditions and the specific needs of students better than local practitioners. As such, this document is not designed to say organizations should or should not spend federal funds on specific investments, strategies, or programs. Such calculations are better made flexibly by local stakeholders considering individual school needs and community priorities. Instead, this paper offers guidance on how districts might approach resource allocation decisions tied to federal relief funds based on the Office of K-12 Outreach's knowledge of theories of leadership, school turnaround efforts, participatory decision-making models, policy processes, approaches to program evaluation, and data analysis techniques. For district and school leaders, this tool outlines a process for deciding how to spend pandemic-related relief funds from the federal government. Additionally, for students, parents, educators, community members, and policymakers, it offers ideas about how to share insights with education leaders and ensure that accountability mechanisms exist around allocated funds.

Decision-Making Significance
Flagging the potential benefits and long-term consequences of this high-stakes funding

While some of the details surrounding federal relief funds to schools can be overwhelming, the stakes of getting allocation decisions right at the local level could not be higher. School boards and administrators must effectively utilize these resources to make consequential, structural changes in the lives of their students, educators, support staff, and community members. **While the funds are not a panacea given broader societal challenges and decades of neglect for many K-12 schools, they offer a substantial opportunity** to move the needle in the right direction. This unprecedented federal funding that schools will get represents "nearly twice the amount schools received" from the federal government after the 2008 recession decimated local finances (Addonizio, 2021). Further, it reflects the tremendous (but not unbounded) flexibility and discretion that the U.S. Congress granted districts regarding how funds are used. In short, **this massive federal investment is a chance for education leaders to offset some effects of the COVID-19 pandemic and begin combating previous underfunding.**

> **Districts and schools must genuinely engage community members and policymakers in their initial decision-making, effectively use federal funds, and be ready to defend the effect of their investments**

These investment decisions also are deeply consequential because of the scrutiny surrounding additional federal support. First, **if spending does not produce change, members of the public and policymakers are likely to be skeptical about the ability of future resource allocations to address student achievement challenges.** That is, future federal and state willingness to supplement traditional streams of revenue for K-12 schools could be implicitly conditioned on whether COVID-19 relief funds have a positive effect on students, families, educators, and communities. This challenge is magnified by society's lack of consensus on what "change" and "effectiveness" entail. For some citizens and policymakers, education spending will be successful only if it raises test scores. For others, success will primarily involve improving students' mental health and bolstering their social-emotional learning. Regardless, it is plausible that decisions made over the next few months will shape the political salience of future federal funding for K-12 schools. Such stakes are underscored by the funds' one-time nature and the fact that, absent federal intervention, they are unlikely to be extended or supplemented in the near term.

Furthermore, how leaders utilize this massive influx of resources could matter for the retention of their employees and the teacher labor force writ large. When the COVID-19 pandemic first hit, alarm bells rang concerning whether there would be enough experienced educators to support classrooms. A national poll found that 28 percent of educators and 43 percent of Black teachers considered retiring early or leaving the profession (Flannery, 2020). Journalists quoted seasoned educators pondering retirement to avoid COVID-19 while think tanks predicted a "personnel crisis," and analysts posited that effects on the labor supply could mimic the educator exodus in New Orleans after Hurricane Katrina (Reilly, 2020; Bailey & Schurz, 2020; Perry, 2020). In Michigan, reports anecdotally connected pandemic-related challenges to the state's almost 50 percent increase in 2020-21 mid-year retirements versus 2019-20 (Livengood, 2021; French, March 2021). **How leaders utilize resources could impact educator and support staff career decisions.**

Finally, **the effectiveness of investments could be treated as a referendum on the value of the entire public education system.** The unfettered impact of the COVID-19 pandemic on student factors (e.g., enrollment, achievement, and well-being), the rise of a permissive charter environment in Michigan, and public scrutiny of misused or ineffectual funds could drive calls for the privatization or atomization of education to focus on the provision of instruction to individual students via a competitive market instead of through the centralized offering of education to communities. These developments would present an existential risk to the future of traditional public education. Already, conservative politicians adopted a rallying cry in various 2020 elections in favor of privatization and the empowerment of choice (Gaudiano, 2020; MEA, 2020). It is not hard to imagine the intensification of these messages if investments in public education fail.

Altogether, **districts and schools must genuinely engage community members and policymakers in their initial decision-making, effectively use federal funds, and be ready to defend the effect of their investments**. Doing so can ensure that students accrue the benefits of this spending, keep educators and staff engaged, and help school and district leaders stave off future critiques.

> **While the funds are not a panacea given broader societal challenges and decades of neglect for many K-12 schools, they offer a substantial opportunity**

Overview of Federal Relief Dollars
Summarizing the history of this support for K-12 schools and key fund details

The CARES Act, CRRSA Act, and ARP Act created a complicated web of federal resources to support states and local education entities through the COVID-19 pandemic. Most centrally, the CARES Act authorized the Education Stabilization Fund, which includes:

- The Governor's Emergency Education Relief (GEER) Fund
- The Elementary and Secondary School Emergency Relief (ESSER) Fund
- The Higher Education Emergency Relief (HEER) Fund (USED, October 2021)

Details around these funds are visible on the Education Stabilization Fund data dashboard via the United States Department of Education (USED). Given the allocation of GEER resources to governors' offices rather than state education agencies (SEAs) or local education agencies (LEAs) and the HEER Fund's emphasis on post-secondary students, this paper is most concerned with ESSER funds (USED, October 2021). The most relevant pots of money for K-12 districts are listed in Table One.

Table One: Relevant ESSER I, II, and III Details

	Money Available	Authorizing Legislation	Entities Involved	Approach to Allocation	Period of Availability
ESSER I	$13.2 billion	CARES Act (Passed 3/27/20)	USED awarded grants to SEAs to support LEAs – LEAs must provide equitable services to non-public students and teachers	Awarded to SEAs using the same formula as Part A of Title I. See the ESSER I Methodology Table	SEAs must have awarded funds between April and June 2021. Funds can be used for costs back to 3/13/20. **They must be obligated by 9/30/22** (including the Tydings Amendment Period)
ESSER II	$54.3 billion	CRRSA Act (Passed 12/27/20)	See ESSER I – Also includes Outlying Areas, the Bureau of Indian Education, and non-public schools (the ESSER I equitable services provision does not apply)	See ESSER I and the ESSER II Methodology Table	SEAs must award funds by January 2022. Funds can be used for costs back to 3/13/20. **They must be obligated by 9/30/23** (including the Tydings Amendment Period)
ESSER III	$122 billion	ARP Act (Passed 3/11/21)	See ESSER I – Also includes special funding for special education, Outlying Areas, non-public schools, homeless youth, Tribal educational agencies, Native Hawaiians, and Alaska Natives	See ESSER I and the ARP ESSER Methodology Table	SEAs must award funds in an "expedited and timely manner." Funds can be used for costs back to 3/13/20. **They must be obligated by 9/30/24** (including the Tydings Amendment Period)

***Details surrounding the ESSER funds are summarized by USED's Office of Elementary & Secondary Education, especially in their ESSER II Fact Sheet and ARP ESSER Fact Sheet (USED, September 13, 2021)

Overview of Federal Relief Dollars

Highlighting the impact of ESSER funds on Michigan K-12 schools

Total federal ESSER allocations to the states along with SEA plans for using these funds are compiled by the National Conference of State Legislatures in their Elementary and Secondary School Emergency Relief Fund Tracker (NCSL, 2021). With that, USED has a listing of approved and outstanding state ARP ESSER plans online (USED, September 17, 2021). For Michigan, funding levels are summarized in Table Two.

Table Two: ESSER Funding Levels for Michigan

	Federal ESSER Funds to Michigan	Minimum Allocation to LEAs from Michigan	The Amount for the SEA to Set-Aside	Plan for the Michigan SEA Set-Aside Funds
ESSER I	$389,796,984	$350,817,286	$38,979,698	Creation of an educational equity fund allocated to LEAs via subgrants
ESSER II	$1,656,308,286	$1,490,677,457	$165,630,829	K-8 summer programs, high school credit recovery programs, before- and after-school programs, benchmark assessments, and discretionary funds
ESSER III	$3,719,833,128	$3,347,849,815	$371,983,313	Michigan's Approved Plan

***Created using the National Conference of State Legislatures' ESSER Fund Tracker (NCSL, 2021)
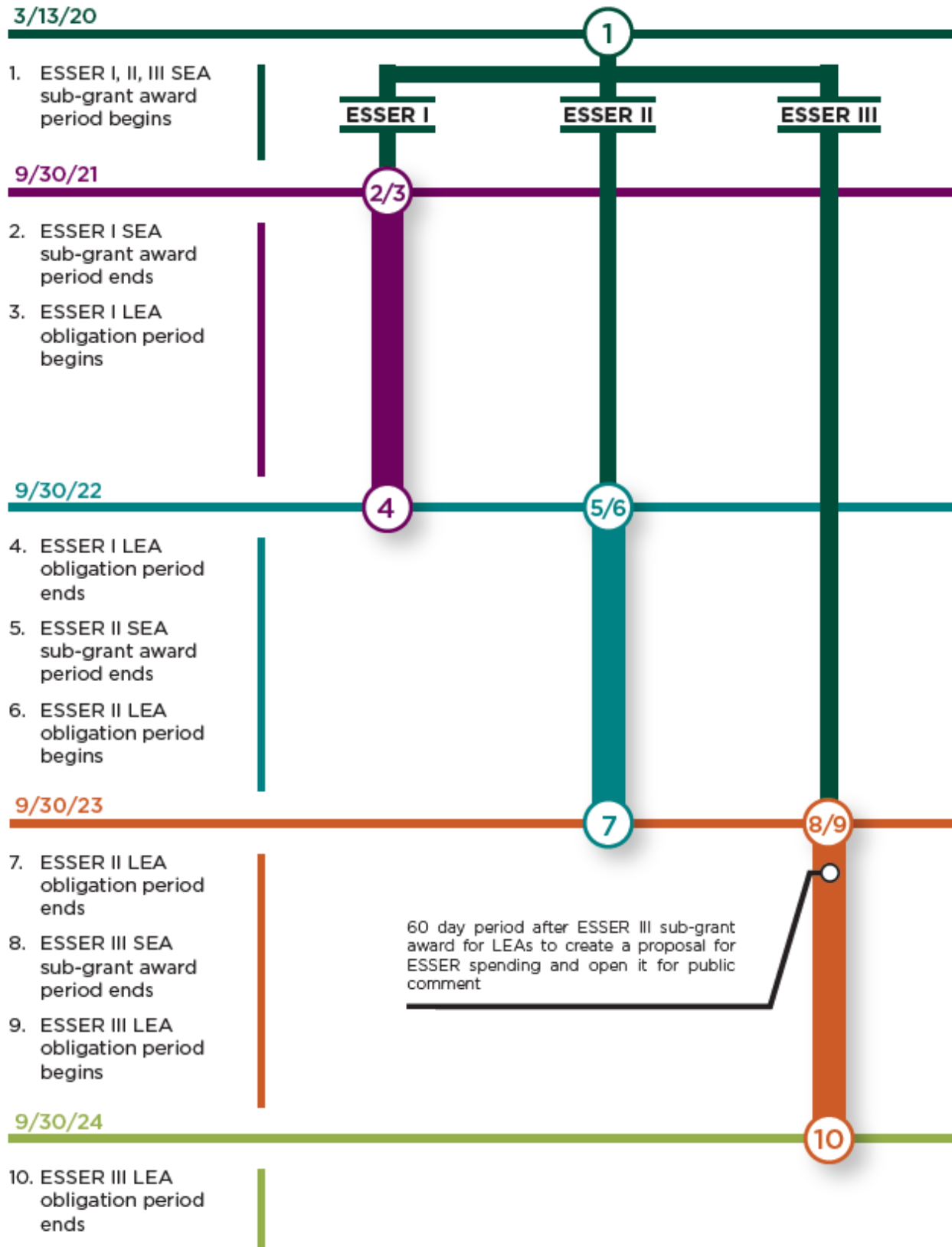
Overview of Federal Relief Dollars

Mapping out key upcoming events related to ESSER funds

For an added sense of when state policymakers, SEAs, and LEAs need to make decisions associated with ESSER resources, Figure One includes a prospective timeline.

Figure One: Prospective ESSER Funds Timeline

3/13/20

1. ESSER I, II, III SEA sub-grant award period begins

ESSER I   ESSER II   ESSER III

9/30/21

2. ESSER I SEA sub-grant award period ends

3. ESSER I LEA obligation period begins

9/30/22

4. ESSER I LEA obligation period ends

5. ESSER II SEA sub-grant award period ends

6. ESSER II LEA obligation period begins

9/30/23

7. ESSER II LEA obligation period ends

8. ESSER III SEA sub-grant award period ends

9. ESSER III LEA obligation period begins

60 day period after ESSER III sub-grant award for LEAs to create a proposal for ESSER spending and open it for public comment

9/30/24

10. ESSER III LEA obligation period ends

***Adapted from CO Department of Education, N.D.

A Funding Decision-Making Model
Presenting the Office of K-12 Outreach's funding decision-making model

This paper proposes a five-step process for decision-making to help districts navigate any confusion around federal funds, prepare for de facto accountability mechanisms like public scrutiny and de jure ones tied to legal requirements, and make locally optimal decisions. It follows work from other entities like *Education Next*, which developed an approach to "determine state and local needs," "do the research," "rule out" unviable solutions, and "prioritize based on cost-effectiveness" (Gordon et al., 2021). Education Resource Strategies put out seven "crucial principles" for leaders making these decisions, including to identify "needs…with an equity lens," select "proven high-impact strategies," focus "on strategies that specifically target recovery," value equity-oriented solutions, "plan spending with an eye toward the future," be clear about "roles," and allow for adaptability based on "context and what works" (ERS, 2021). In the Office of K-12 Outreach's model in Figure Two:

1. Leaders are encouraged to undertake a school and district needs assessment that engages educators, staff, community members, families, students, and other stakeholders to determine their existing and desired states of education.

2. Decisionmakers should pair their identified needs with evidence-based solutions that maximize each invested dollar's effect. These two steps should occur before an in-depth consideration of what state and federal laws allow districts to use federal relief funds on to ensure decisionmakers have a holistic picture of their needs.

3. With this clear understanding, school and district leaders ought to situate their selected solutions in the context of legal requirements tied to the CARES, CRRSA, and ARP Acts.

4. Fourth, administrators and school boards can engage in strategic planning around what desired solutions to district needs can be met with these one-time funds, which ones require the use of associated resources like those from state operational funds and possible local revenue-raising efforts, and braided funding that "pools multiple funding streams toward one purpose while separately tracking and reporting on each" (Urban Institute, 2021).

5. Finally, leaders should plan for program evaluation and accountability strategies to ensure that selected options push the district towards its community-identified desired state and plan for the next steps if selected programs are ineffectual.

Figure Two: The Office of K-12 Outreach's Funding Decision-Making Model

The rest of this paper reviews each of these steps and offers supporting resources for leaders. Members of the public and policymakers tracking district decisions can support this model's implementation with their desires, experiences, and research.

Step 1: Needs Assessment
Undertaking a community-driven school and district needs assessment

Though this wave of federal funds is immense, educational leaders, policymakers, and members of the public must remember its contextual place in an ocean of needs. Even before the COVID-19 pandemic increased costs for schools providing virtual or "safe, physically-distanced in-person instruction," cut district revenue by slashing student enrollment, and presented added needs to be addressed, administrators faced dilemmas of how to balance competing and frequently overwhelming financial priorities (Zhou et al., 2021). These significant needs reflect decades of inequitable school funding.

Michigan is an exemplar of this condition. Past funding challenges, producing intense current needs, are attributable to the state's decision not to provide financial support to districts for capital costs (Arsen & Davis, 2009). Presently, there are "wealthy districts [able to] build and upgrade fine schools, often with low property tax rates" while "poor districts endure aging, dilapidated and sometimes unsafe schools – despite paying high property tax rates" (Addonizio, 2021). With that, while Michigan centralized funding of operating costs under Proposal A, it has not adequately raised revenue to support schools (Arsen, Delpier, & Nagel, 2019). To ensure that past and present needs are accounted for, before making decisions with this pot of money, leaders should conduct a needs assessment driven by community engagement and stakeholder feedback. This work includes identifying existing and desired states, planning the needs assessment, and genuinely engaging stakeholders.

1A. Identifying the district's existing and desired states

Needs assessments "can help educators at all levels successfully identify, understand, and better address education challenges" (Cuiccio & Husby-Slater, 2018). They do so by helping schools and districts "find gaps between current conditions (what is) and desired conditions (what should be), place these gaps or needs in priority order, implement strategies, practices, and evidence-based interventions aligned to needs, and target resources to address needs" (Office of Elementary & Secondary Education, 2020). The prerequisite step to this analysis involves education leaders and stakeholders reflecting on what they would like their district to entail. This desired state contrasts the district's existing state (Garmston & Wellman, 2009).

> **A district's <u>existing state</u> captures the present-day conditions that students, educators, and communities experience at their schools. It describes "what is" happening**

> **A district's <u>desired state</u> involves a vision of what goes into "effective schools" that satisfy student, educator, and community needs. It reflects the conditions that "should be" for all**
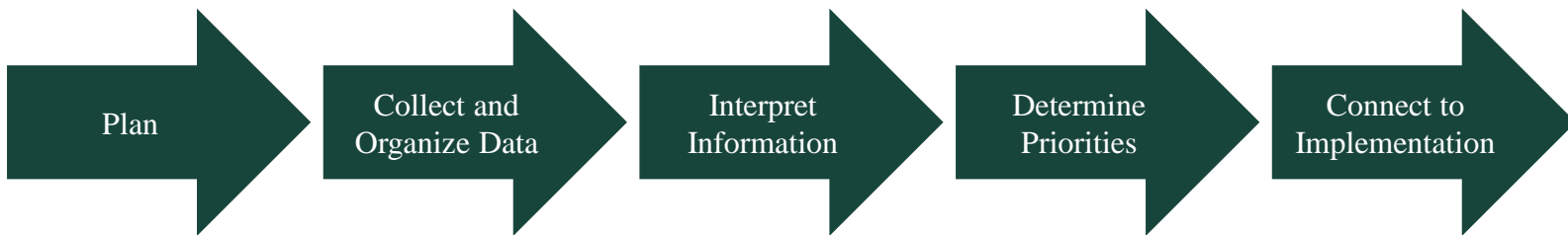
***Adapted from Garmston & Wellman, 2009; Office of Elementary & Secondary Education, 2020

In describing their desired state, districts will likely seek "effective schools" that satisfy student, educator, and community needs. While defining what characterizes "effective schools" is a somewhat subjective and value-laden exercise, it is an essential first step. Without a clear, community-derived end goal for federal spending, districts might miss community priorities, lose sight of historically unmet needs, or make a series of ad hoc decisions that ameliorate short-term problems but do not fit together to change the district's trajectory. With a specific vision and defined end goal, stakeholders can work towards building the same project, and individual decisions can harmonize to construct something larger than the sum of their parts.

1B. Planning the needs assessment

Once educational leaders and community stakeholders have built an initial consensus on what the district should strive to achieve, the needs assessment process can begin. The State Support Network's Needs Assessment Guidebook lays out an instructive model of what this work requires leaders to accomplish. It is included in Figure Three.

Figure Three: A Recommended Model for District Needs Assessments

Plan → Collect and Organize Data → Interpret Information → Determine Priorities → Connect to Implementation

***Adapted from Cuiccio & Husby-Slater, 2018

In this framework, districts first take the desired state that they have tentatively agreed with stakeholders to seek and consider how a needs assessment can help them plan how to get to that end goal. Leaders will need to reflect on what questions the district needs assessment should address, who should be brought into the process, what elements will be included in this work, and how results will be communicated to external audiences. Second, districts need to cultivate an evidence-based understanding of their existing or current state by collecting and analyzing student, educator, administrator, demographic, process, and perception data. Then, with this information, leaders must partner with community stakeholders to understand what the collected data suggest and how current challenges should be prioritized. Finally, decisionmakers conducting needs assessments should plan action items to get from the district's existing state to its desired state. In doing so, they must understand the root cause(s) of current needs, think about districtwide or schoolwide initiatives that are already occurring, and assess how findings fit within the local context (Cuiccio & Husby-Slater, 2018).

Further, there are six supplementary needs assessment elements from the Office of Elementary & Secondary Education:

1. The provision of "guidance, training, and support to districts and schools around conducting a school-level needs assessment"

2. A determination of what schools should achieve, which includes a statement of district values and priorities

3. The use of data, testimony, observation, surveys, and narratives to identify current conditions in comparison to desired ones

4. A root cause analysis to determine why needs are being unmet. A helpful model of this tool is visible in the American Institutes for Research's *Root-Cause Analysis Workbook*

5. The construction of a hierarchy of needs or a district plan of how to triage the many needs that schools currently face

6. The verification of findings with all stakeholders (Office of Elementary & Secondary Education, 2020)

Along the way, district leaders should not feel isolated in this work. For one, many districts already have staff members that are experts on how to conduct needs assessments and engage community members. The Office of Elementary & Secondary Education requires Comprehensive Support and Improvement (CSI) schools, based on accountability calculations, to complete needs assessments (Office of Elementary & Secondary Education, 2020). Further, districts might be familiar with this process as many Elementary and Secondary Education Act (ESEA) and Every Student Succeeds Act (ESSA) programs mandate needs assessments. Such initiatives include Comprehensive Literacy State Development (CLSD) Grants, Student Support and Academic Enrichment (SSAE) Grants, resources for Full-Service Community Schools (FSCSs), and Preschool Development Grants (PDGs) (Cuiccio & Husby-Slater, 2018). Where the local capacity to conduct these analyses exists, it should be leveraged. Moreover, there are multiple free tools to walk decisionmakers through needs assessments, including one from the Center on School Turnaround and the Council of Chief State School Officers called "Using Needs Assessments for School and District Improvement." This resource, and many others, walk through how to plan a needs assessment, design it, pair it with school improvement, and make key decisions (Corbett & Redding, 2017).

1C. Genuinely engaging stakeholders

In nearly every step of conducting a needs assessment, it is imperative that decisionmakers actively seek genuine engagement with individuals invested in the district's success, including educators, building staff, administrators, community members, students, families, business leaders, and other stakeholders. This commitment to outreach and participatory decision-making is essential to prevent backend resistance to selected district goals and funding choices, "create more effective solutions" by incorporating stakeholder expertise of local conditions, build citizen capacity to engage the district in the future, "empower and integrate people from different backgrounds," build coalitions across the community, and cultivate trust (Bassler et al., 2008).

As districts roll out their strategies to engage stakeholders, they can consider some tips from the Association for Supervision and Curriculum Development's community outreach plan, including to:

1. **Take advantage of non-traditional means for public input**, including video and social media, to boost community participation and address accessibility concerns.

2. **Think beyond education in the school building** by considering what roles schools and districts have in adult education, community access to social services, and local nonprofits. From there, they might link up with leaders of organizations tied to those goals.

3. **Be creative with possible partners** and take a broad view of their community to ensure that folks like local businesses, non-school aged children, and community members without children have their voices heard (Schwanke, 2020).

More broadly, the Minnesota Department of Health lists core "Principles of Authentic Community Engagement" to frame community outreach efforts. They are that:

1. **Leaders need to "foster trust"** by taking time to build rapport with stakeholders, listening actively, considering the effectiveness of past community outreach, and appreciating the value of different experiences and perspectives.

2. **There is value in efforts that "support community-led solutions"** by giving community members voice instead of just doing things "for" or "to" them, recognizing community values, structurally balancing power, generating ideas for how to "create positive experiences of contribution" and "recognize the contributions of the community," and ensuring that everyone can "agree on the process" for offering feedback before decisions start being made.

3. **Gains in the education space necessitate "social change"** by brainstorming ways to make this engagement lasting, considering how to challenge structural barriers to district goals like racism, poverty, and other forms of discrimination, and building coalitions among participants (MN Department of Health, 2018).

In the Michigan context, the Michigan Department of Education's [MiFamily](#) unites "research and best practices to provide resources integrating family engagement into the school and program improvement process" (MDE 2020). While it focuses on outreach to families, its values of creating "shared responsibility," "strength-based and collaborative" engagement, "systemic" connections, relations that are "integrated and sustained with purposeful connections to learning," and collaboration that is centered on community "ownership and continuous improvement" can be applied to many stakeholders (MDE, 2020).

In thinking about creatively engaging students, families, staff, and community members, leaders can reflect on what strategies have worked during the pandemic. As a golden rule, administrators ought to make every effort to meet stakeholders whenever and wherever they are to ensure that all voices, especially marginalized ones, are heard and incorporated. As districts move beyond this first step, they must continue collaborating with stakeholders at each decision-making stage.

Step 2: Matching Needs to Solutions
Conceptualizing how to pair identified needs with evidence-based solutions

Once districts grasp a sense of their past and current unmet needs, they can begin matching identified needs with evidence-based solutions. In this second step, education leaders are encouraged not to overemphasize what the CARES, CRRSA, and ARP Acts allow. Instead, they should fully understand what needs they must address and what programs, activities, and funding decisions could most adequately respond to these challenges. This problem-solution pairing process includes both finding evidence-based remedies to current troubles and assessing school and district readiness for the selected options.

2A. Finding evidence-based solutions

A wealth of knowledge exists about effective tools for districts in the Michigan Integrated Continuous Improvement Process (MICIP) process guide (Rice et al., 2021). Specifically, this initiative includes the MiStrategyBank, which consolidates a variety of high-impact approaches for schools and districts to consider in the curriculum space. Beyond offering a reference of specific programs, it details a framework for assessing how well-evidenced an initiative is in its "Tiers of Evidence" model that is featured in Table Three.

Table Three: The MICIP Tiers of Evidence Model

|	Research Required	Role of the What Works Clearinghouse Standards	Statistical Evidence Needed	Sample Size
Tier 1 – Strong Evidence	Experimental Study	Meets without Reservations	Statistically Positive Effect	350+ Students and 2+ Sites
Tier 2 – Moderate Evidence	Quasi-Experimental Study	Meets with or without Reservations	Statistically Positive Effect	350+ Students and 2+ Sites
Tier 3 – Promising Evidence	Correlational Study	Meets with or without Reservations	Statistically Positive and Favorable Effect	N/A
Tier 4 – Demonstrating A Rationale	Logic Model Informed by Research or Evaluation	N/A	Planned Effort to Study the Effect	N/A

***Adapted from Rice et al., 2021

For added possible solutions, school and district leaders might consult Michigan's submitted plan for ARP ESSER funds. First, this resource features the Michigan Department of Education's COVID-19 Education Information and Resources website, which includes guidance on topics like what districts need to reopen safely, how to support students that are learning remotely, what resources exist around pandemic-related professional learning opportunities, how educators can ensure that student social-emotional learning needs are met, what supports are around for students receiving special education services, and what capital spending districts might consider to ensure clean air and water in schools (Guerrant, 2021). Second, Michigan's submitted plan directs decisionmakers to USED's Safer Schools and Campuses Best Practices Clearinghouse, which has "lessons learned" during the pandemic along with realized "best practices" (Guerrant, 2021). Finally, throughout the document, the Michigan Department of Education flags copious examples of spending priorities, creative solutions to common pandemic-related challenges, suggested programs, and processes to effectuate the change that leaders might seek.

2B. Assessing district readiness for the solutions

The likelihood that an intervention can address an identified district need depends both on the proven effectiveness of that selected effort and the district's readiness to implement it. In addition to offering perspective on some evidence-based solutions, the MICIP process guide includes a framework for thinking about if a selected strategy is "the right thing to do" and if it can be done "the right way" (Rice et al., 2021). This Hexagon Tool, summarized in Figure Four, gives leaders the chance to assess whether their selected intervention generally is effective based on the school or district's need for it, the evidence behind its utility, and its fit to the local context. It also encourages decisionmakers to determine if the district is prepared to implement the selected intervention based on their capacity, its usability, and available supports.

Figure Four: MICIP's Hexagon Tool to Consider District Readiness for Selected Solutions
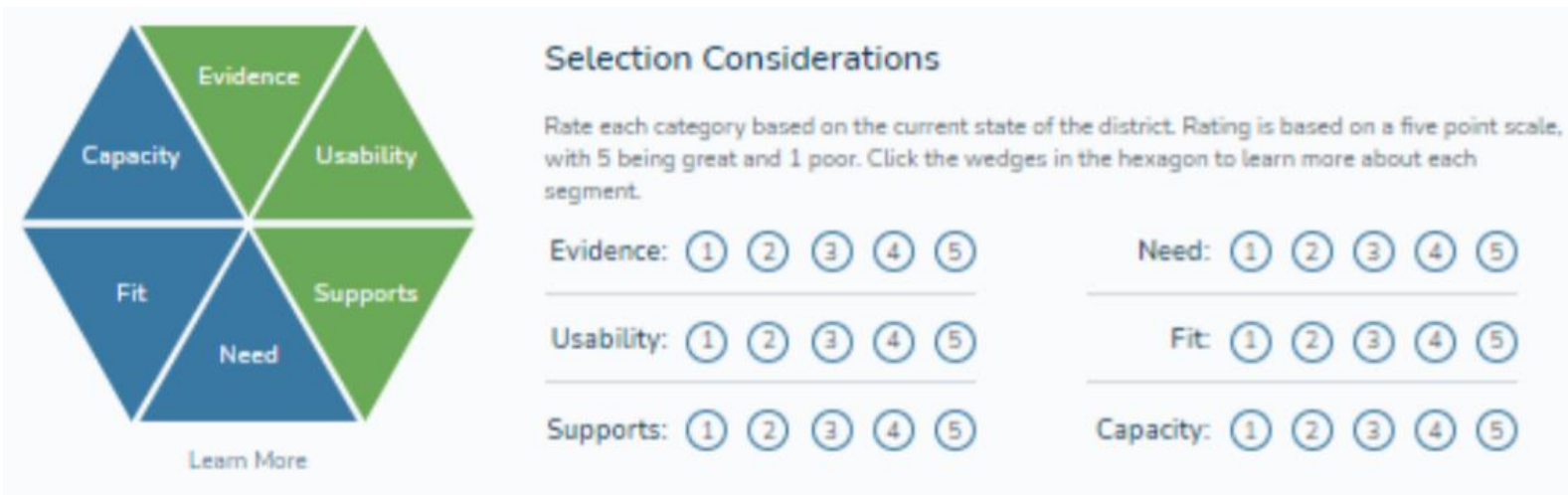
***From Rice et al., 2021

While this Hexagon Tool is designed to facilitate the selection of instructional interventions tied to the MICIP initiative, the questions that it asks can be effectively adapted to any solutions that districts consider. All in all, by undertaking a comprehensive analysis of the evidence that supports different possible interventions and those solutions' appropriateness in the district's context, leaders can ensure that they are effectively responding to local needs. From here, decisionmakers can determine where federal pandemic relief funds can support district efforts to transition from their existing to their desired state, along with where alternative resources will be required.

Step 3: Meeting ESSER Requirements
Situating desired investments in the context of authorized spending

Most coverage of federal relief funds correctly emphasizes their flexibility. That said, there are some restrictions and legal boundaries to remember.

District leaders must note the following points to determine where federal relief funds can support desired spending and where alternative financial resources are required. These considerations must include an understanding of what ESSER spending can be utilized for and an identification of what project-specific requirements and potential external regulations govern the use of these funds.

3A. Understanding the legal environment around ESSER spending

The CARES, CRRSA, and ARP Acts, authorizing ESSER funds I-III, outline acceptable uses of this federal support. Broadly, legislative priorities include spending to reverse learning losses, support marginalized populations, prevent additional disease spread, provide students with access to cutting edge educational technology, revitalize student mental health, and coordinate the efforts of educators with public health departments (USED, May 2021). In detail, a Frequently Answered Questions document from USED flags allowable uses of ESSER funds as including:

1. Items authorized by the Elementary and Secondary Education Act, including the Native Hawaiian Education Act and the Alaska Native Educational Equity, Support, and Assistance Act

2. Items authorized by the Individuals with Disabilities Education Act

3. Items authorized by the Adult Education and Family Literacy Act

4. Items authorized by the Carl D. Perkins Career and Technical Education Act of 2006

5. Items authorized by subtitle B of title VII of the McKinney-Vento Homeless Assistance Act

6. Coordination of LEAs with various public health departments

7. Supporting principals and other school leaders

8. "Activities to address the unique needs of low-income children or students, students with disabilities, English learners, racial and ethnic minorities, students experiencing homelessness, and children and youth in foster care"

9. "Procedures and systems to improve the preparedness and response efforts of LEAs"

10. Training and professional development on sanitation and minimizing disease spread

11. Cleaning supplies

12. "Activities during long-term closures, including providing meals to eligible students, providing technology for online learning to all students, providing guidance for carrying out requirements under the IDEA and ensuring other education services can continue"

13. Educational technology

14. "Mental health services and supports"

15. Activities tied to "summer learning and enrichment and supplemental after-school programs, including providing classroom instruction or online learning during the summer months and addressing the needs of" vulnerable populations

16. "Addressing the academic impact of lost instructional time"

17. "School facility repairs and improvements"

18. "Inspection, testing, maintenance, repair, replacement, and upgrade projects to improve the indoor air quality in school facilities"

19. "Developing strategies and implementing public health protocols…for the reopening and operation of school facilities"

20. "Other activities that are necessary to maintain the operation of and continuity of services in the LEA and continuing to employ existing staff of the LEA" (USED, May 2021)

3B. Identifying added requirements and external regulations

Although authorizing legislation allows for a broad use of funds, decisions made are still beholden to other regulations. For example, construction, while permissible, comes with various federal, state, and local regulations like the Davis-Bacon Act, Uniform Guidance, and the Buy American Act. Appendix A summarizes some areas of ESSER spending and potential requirements. While this paper offers some initial perspectives, districts should pursue legal counsel as needed.

As districts consider how they can use federal funding to address unmet needs and finance desired solutions, they should keep in mind some of the timeline restrictions and regulations surrounding spending that complicate some of the flexibility they feel.

Step 4: Strategic Planning

Engaging in strategic planning to support unfunded needs

As evidenced in step three of this guide, federal relief funds offer districts significant flexibility but also come with some requirements, conditions, and strings. As such, it is distinctly possible that districts will find that they have needs beyond what federal funds can support. This realization necessitates district strategic planning to identify unmet needs, consider how to facilitate these desired changes, and finalize the steps that are vital to realize the district's end goal.

4A. Determining remaining needs

Just because ESSER funds cannot support some district needs does not mean that parallel tracks of funding cannot be pursued to comprehensively address needs. While this document focuses on the deluge of federal supports, in June 2020, Michigan lawmakers passed a "tidal wave of funding" for schools, equalizing per-pupil spending and establishing equality in operational support (Altavena, 2021). While there are still concerns about whether this funding is equitable, its inability to support capital investments, if districts can maintain enrollment numbers vital to capitalize on this boost, and the adequacy of state support, there are significant state resources that are available for core operational efforts (Egan, 2021). Other funding exists from:

1. Supplementary state grants, programs, and initiatives tied to the MDE and other agencies

2. Added federal grants, programs, and initiatives linked to USED and other agencies

3. Local revenue-generating options for capital expenditures that are allowable under Proposal A

4. Support from foundations and private entities

4B. Funding unmet needs and finalizing next steps to the district's desired state

With an understanding of their unique local needs, which solutions could work best for them, and what funds match each of the selected solutions, district leaders must put together all these distinct pieces to verify that their plan gets the district to their desired state and that it respects the interests of all relevant stakeholders. To do so, districts should reflect on questions like:

1. What is the logic and evidence behind how each funded program addresses the specific need that it targets?

2. Which tasks and activities will be included in the implementation of each solution?

3. What non-financial resources will be required?

4. When will efforts be implemented?

5. How will new programs operate alongside other initiatives, including current ones?

6. Who will oversee the implementation of specific reforms?

7. What individuals will ensure collaboration across disparate projects?

By answering these questions on the front end, leaders can coordinate distinct efforts and achieve lasting change. As with the other steps in this guide, it is essential that everyone, including students, parents and guardians, civil rights organizations, administrators, educators, support staff, and community members, has a voice in this implementation plan and strategic vision.

Step 5: Evaluation and Accountability

Planning program evaluation and accountability next steps to address concerns

The final step in making financial decisions related to federal relief funds recognizes that improvement is continuous and that school turnaround efforts demand constant revisitation. Leaders cannot merely make allocation decisions and turn to other pressing considerations. Instead, they ought to design means of program evaluation and accountability to ensure that districts can move from their existing to desired states even in the face of challenges that emerge along the way. This planning requires decisionmakers to clearly define success criteria for their investments and set up policy analysis procedures.

5A. Defining success and how to measure it

The first step of this process guide encouraged leaders to work with stakeholders to define their district's desired state. This end goal, along with the gap between it and the district's existing state, shape what needs get prioritized, which solutions are selected, and how federal funds can be obligated. The district's desired state also should drive policy evaluation. The success criteria or desired outcomes measured with collected data that guide evaluation should collectively comprise what is required to reach the district's desired state.
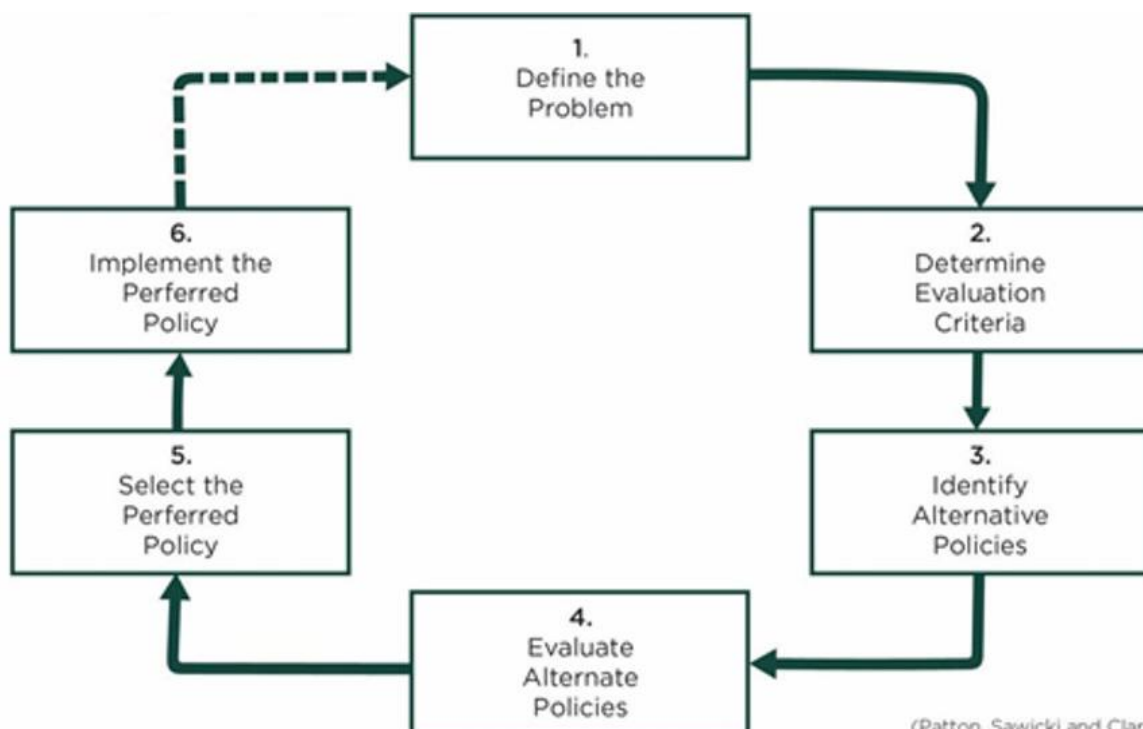
Because different stakeholders have a wide range of values, aspirations, measures of success, and definitions of effective schools, decisionmakers must work with community members to come to a common understanding of what it will look like if federal relief funds were used impactfully.

As leaders, policymakers, and community members begin to consider these success criteria, many metrics will likely center on student achievement, measured through instruments like state standardized tests. Given past funding inequities, the time that it can take for educational interventions to change conditions for students, and the complexity of causal program evaluation, stakeholders might also consider non-achievement metrics such as ones built around student well-being, satisfaction, and mental health. Attainment of these objectives is a worthwhile effort on its own, and progress on these desired outcomes might be a precondition for facilitating gains in other success criteria like student achievement.

5B. Setting up policy analysis

With well-defined goals and success criteria developed in concert with the community in mind, decisionmakers can consider how to assess their investments' effectiveness. Many models of evaluation are available to structure reflection. One model breaks the task into six components, as seen in Figure Five.

Figure Five: A Process for Undertaking Policy Analysis

1. Define the Problem
2. Determine Evaluation Criteria
3. Identify Alternative Policies
4. Evaluate Alternate Policies
5. Select the Perferred Policy
6. Implement the Perferred Policy

(Patton, Sawicki and Clark, 2016)

In this approach, leaders first think about the problem (or their existing state) and selected success criteria, and they consider what different solutions are available. From there, the evaluative process considers how well the selected solution advanced the district's interests and what trade-offs occurred. Then, decisionmakers can reevaluate the decision made and decide if there were issues in policy selection or if implementation derailed or supported success. Finally, leaders should revisit the district's existing state to consider whether the status quo represents the best option or if tinkering is need. Through this approach, education leaders can ensure they are constantly improving and selecting solutions that are most likely to thrive.

Alongside this evaluative task, districts might consider tracking their spending of federal resources and creatively communicating results to members of the public and policymakers. These efforts can model the National Conference of State Legislatures' ESSER Fund Tracker and USED's summary of state plans for ARP funds (NCSL, 2021; USED, June 2021).

Finally, school and district decisionmakers should attempt to put themselves in the shoes of external audience members. They should imagine the perspectives of lawmakers curious about the impact of their investment in K-12 schools, state and federal government officials wanting to ensure that funds are being used properly by local entities, and families, educators, and community members seeking evidence that schools are meeting students' unique post-pandemic needs. The Education Trust has a list of questions that "families and advocates" can propose as "district and school leaders are making plans," which decisionmakers should be prepared to answer (Patrick, 2021). They include:

1. "How do you plan to spend federal relief dollars?"

2. "How do you plan to include families and communities in the process?"

3. "How does the school plan to focus on assets instead of deficits, ensure equity, and meet the needs of each child?"

4. "What additional staff do you plan to hire to meet the social, emotional, and academic needs of the students in the building? What professional development will you provide to existing staff?"

5. "How will you assess whether my child is on grade level after so many school disruptions?"

6. "How will you ensure that learning is accelerated instead of remediated?"

7. "What is the school's plan to ensure that students who are ready get enrolled in advanced courses?" (Patrick, 2021)

In designing and implementing a clear protocol for evaluation, documenting and justifying their spending decisions, communicating final resource allocations to members of the public, and being ready to think about the use of federal pandemic relief funds from the perspectives of students, families, educators, community members and other stakeholders, administrators can capture the upsides of federal investments while minimizing risks. Specifically, school and district leaders can build trust through transparency, keep a clear record of how spending supported schools, and set up further means of accountability. Each of these steps might decrease the likelihood of backlash to selected uses of this funding.

Conclusion
Emphasizing the potential of this moment and considering next steps

The federal government's decision to allocate almost $200 billion to K-12 education via the Coronavirus Aid, Relief, and Economic Security (CARES) Act, Coronavirus Response and Relief Supplemental Appropriations (CRRSA) Act, and American Rescue Plan (ARP) Act presents a tremendous opportunity for districts to reconceptualize how they educate America's youth. That said, it also raises the stakes in creating a potential referendum on how effectively schools utilize added financial support and whether the public education system can thrive after the many effects of the COVID-19 pandemic. These opportunities and threats are magnified by the one-time nature of this funding and its clear deadlines for spending by states and districts. By systemically analyzing how to utilize federal funds, education leaders can minimize such threats and positively impact the lives of their students. Over the next few years, policymakers, researchers, and members of the public can support these efforts by tracking spending decisions and their effects. Appendix B flags some initial spending priorities determined by Michigan school districts to review later down the road as research around this topic continues.

The Role of the Office of K-12 Outreach

Noting the Office of K-12 Outreach's mission and vision

The Office of K-12 Outreach, under the leadership of Director Dr. Bryan Beverly, offers unmatched experience in developing and implementing customized support for schools and districts seeking turnaround and rapid improvement in student achievement. Our unique field-oriented service organization within the university brings a 20-year history of collaboration with schools and districts across the state. K-12 Outreach has experience working with school districts on topics ranging from staff professional development to data analysis to central office transformations to Diversity, Equity, and Inclusion initiatives. We are available in this new environment to help districts plan to utilize their federal relief funds effectively.

Contact Information

To learn more about any of these services or for broader questions, feel free to visit the Office of K-12 Outreach's website at https://education.msu.edu/k12/ or reach out to members of the office that supported this white paper:

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The Office of K-12 Outreach is grateful to student workers **Sam Anklin**, **Sasha Lustman**, and **Patricia De La Hoya-Velez** for their contributions on this paper.
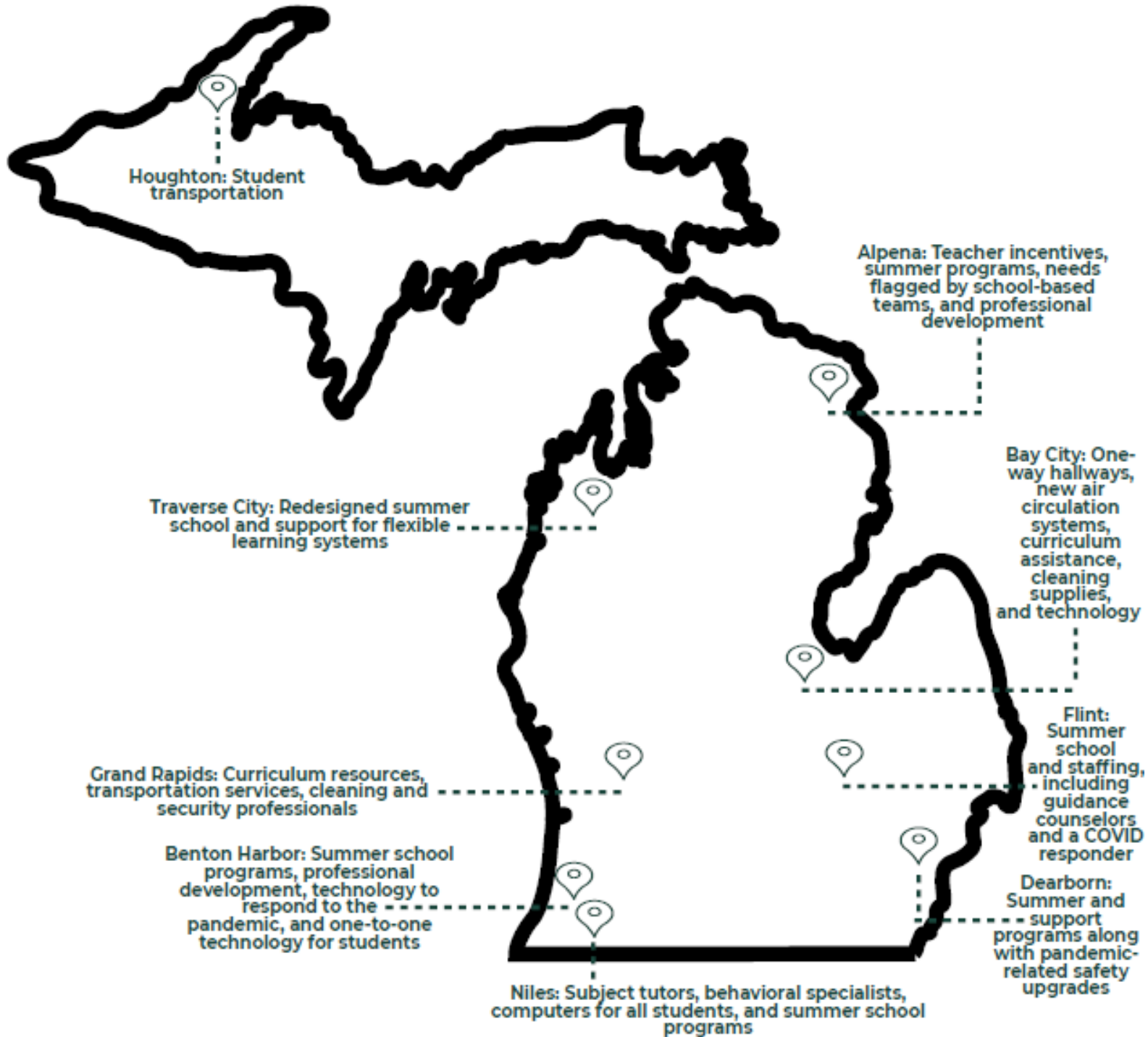
Appendix A
Possible regulations and restrictions surrounding federal relief funding

Area of Spending	Description	Possible Regulations
Construction or Renovation	While new construction is highly discouraged due to ESSER-related time constraints and the one-time nature of these funds, renovation and remodeling are more than acceptable. To promote a safe return to in-person schooling, renovating HVAC systems, replacing carpeting, and conducting general sanitation improvements are viewed as strong uses of ESSER funds. Districts are not encouraged to spend these resources on new buildings, sports complexes, etc.	• Uniform Guidance • Davis-Bacon • 34 CFR § 76.600 (See 20 U.S.C. 1232b Labor Standards) • Buy American Act provisions • ESEA Title VII • Cost Principles in 2 CFR Part 200, subpart E • CARES, CRRSA, ARP • Environmental Impact Assessment 34 CFR § 75.601 • National Register of Historic Places 34 CFR § 75.602 • Grantee use and possession of the facility for 50 years or the useful life of the facility 34 CFR § 75.603 • Construction approved 34 CFR § 75.605 • Reasonable timeframe 34 CFR § 75.606 • Functional and economical 34 CFR § 75.607 • Compliance with federal, state, and local health and safety standards and accessible to people with disabilities 34 CFR §§75.609 and 75.610 • Grantee funds to operate/maintain the facility 34 CFR §§ 75.614 and 75.615
School and Extra-Curricular Programs	To address and mitigate the effects of lost instructional time, ESSER allows for a wide range of programs, including after-school, extra-curricular, vocational learning, dual enrollment, and other evidence-based ones.	• ESEA • IDEA
Equipment, Technology, and Cybersecurity	While an emphasis is placed on the safe return to in-person teaching, due to possible quarantines and other potential health issues, authorizing legislation permits improving schools' technology infrastructure. That can include providing students with laptops, enhancing technology-based teaching options, or improving cyber security. Technology may also be used to address learning loss and improve in-person courses.	• ESEA • IDEA • 2 CFR § 200.439(b) • 2 CFR § 200.318(d) • 34 CFR § 300.5
Sanitation and Maintenance	ESSER funding may be used to improve sanitation conditions and maintain buildings that may prove to be hazardous to student health. A suggested use of ESSER funds is to bring buildings more into line with CDC recommendations.	
Food Services	Because of how the pandemic has not only affected student learning but also exacerbated existing inequities in economic conditions, providing students with free meals whether at school or at home can have a positive effect on student well-being.	
Mental, Social, and Emotional Wellness Programs	ESSER funds may be used to improve student wellness (mental, social, or emotional). Districts can consider supporting the arts, music, sports, counselling, tutoring, and learning assistance programs.	• ESEA • IDEA

***Adapted from USED, May 2021

Appendix B
Initial district funding priorities

HOW MICHIGAN SCHOOLS ARE SPENDING
FEDERAL RELIEF FUNDS

Houghton: Student transportation

Alpena: Teacher incentives, summer programs, needs flagged by school-based teams, and professional development

Bay City: One-way hallways, new air circulation systems, curriculum assistance, cleaning supplies, and technology

Traverse City: Redesigned summer school and support for flexible learning systems

Flint: Summer school and staffing, including guidance counselors and a COVID responder

Grand Rapids: Curriculum resources, transportation services, cleaning and security professionals

Benton Harbor: Summer school programs, professional development, technology to respond to the pandemic, and one-to-one technology for students

Dearborn: Summer and support programs along with pandemic-related safety upgrades

Niles: Subject tutors, behavioral specialists, computers for all students, and summer school programs

***Adapted from Barbour, 2021; Frick, 2021; Herndon, 2021; Holladay, 2021; Mauriello, 2021

Appendix C
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