ESSER III INVESTMENT DECISION GUIDE USER AND RESOURCE COMPANION

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ESSER III Investment Decision Guide User and Resource Companion

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Introduction

The $122 billion provided through the American Rescue Plan's (ARP) ESSER program (ESSER III) is aimed at supporting states and school districts to provide in-person instruction as safely as possible while also addressing learning loss that occurred over the past year and a half due to the disruption caused by school closings and a rapid transition to virtual learning in most districts. However, the significant support provided should also be viewed as a rare opportunity for investing in planning and implementation of long-term improvements. Many schools and districts have thought about doing things differently or developing a comprehensive improvement plan to better serve all students, but never had the time, money, or expertise to do so. Now may be the time.

Certainly, ESSER III funds must be used for the allowable purposes outlined in the federal law and regulations. However, these approved uses are really about better serving students by creating improved learning environments; providing additional supports for students falling behind; doing a better job of serving students with special needs, such as students who are low-income, English language learners, disabled, ethnic or racial minorities, homeless, or in foster care; and addressing students' social-emotional needs. These are areas in which all districts should be constantly striving to improve, not just during the COVID-19 pandemic.

The ESSER III Investment Decision Guide and companion documents are designed to help you think through and prioritize how your school or district may use ESSER III funds not only to come back from the challenges of the pandemic, but to also leverage long-term, substantive improvement and to reassess your school or district operations and instructional program to become both more effective and more efficient. This suite of documents includes:

» The ESSER III Investment Decision Guide is designed to help your school or district make informed decisions about how to invest ESSER III funds to meet the immediate needs outlined in the law and into the future as you transition back to "normal" operations. The Decision Guide walks you through eight questions that will help in making cost-effective resource allocation decisions.

» The ESSER III Investment Decision Guide User and Resource Companion (this document) provides guidance and additional resources to assist you as you work through the questions in the Investment Decision Guide as you weigh alternatives for investing ESSER III and other available funds. The first section summarizes basic information about the ESSER III program, and the second section provides an overview and resources for making strategic use of these funds.

» The Alternative Investment Worksheet is an Excel worksheet designed to help organize and prioritize alternative investment options for ESSER III funds over the 3 years these funds are available. It allows districts to summarize in one place the information generated through the ESSER III Investment Decision Guide process.

Section 1. ESSER III Information

As a condition of receiving ESSER III funds, local education agencies (LEAs) are required to publicly post their plan for returning to in-person instruction within 30 days of receiving ESSER III funds. LEAs must also ensure maintenance of equity in the use of ESSER III funds (see more below).

LEA Allowable Uses

According to U.S. Department of Education guidance, ESSER III funds may be used for the following purposes:[1]

- At least 20 percent of LEA funds must be reserved to address learning loss through "implementation of evidence-based interventions and ensure that those interventions respond to students' social, emotional, and academic needs and address the disproportionate impact of COVID-19 on underrepresented student subgroups (each major racial and ethnic group, children from low-income families, children with disabilities, English learners, gender, migrant students, students experiencing homelessness, and children and youth in foster care)."

In general, any remaining LEA funds may be used for the same purposes as ESSER I and ESSER II funds. More specifically, the guidance states remaining ESSER III funds may be used for:

> …. a wide range of activities to address needs arising from the coronavirus pandemic, including any activity authorized by the Elementary and Secondary Education Act (ESEA), the Individuals with Disabilities Education Act (IDEA), Adult Education and Family Literacy Act (AEFLA), or Carl D. Perkins Career and Technical Education Act of 2006 (Perkins CTE). Specifically, ARP ESSER funds may be used to develop strategies and implement public health protocols including, to the greatest extent practicable, policies in line with guidance from the Centers for Disease Control and Prevention (CDC) on reopening and operating schools to effectively maintain the health and safety of students, educators, and other staff, as well as:
>
> - Coordinating preparedness and response efforts with State, local, Tribal, and territorial public health departments to prevent, prepare for, and respond to COVID-19;
> - Training and professional development on sanitizing and minimizing the spread of infectious diseases;
> - Purchasing supplies to sanitize and clean the LEA's facilities;
> - Repairing and improving school facilities to reduce risk of virus transmission and exposure to environmental health hazards;
> - Improving indoor air quality;
> - Addressing the needs of children from low-income families, children with disabilities, English learners, racial and ethnic minorities, students experiencing homelessness, and foster care youth;

[1] See U.S. Department of Education Fact Sheet, American Rescue Plan of 2021, Elementary and Secondary School Emergency Relief Fund (ARP ESSER) https://oese.ed.gov/files/2021/03/FINAL_ARP-ESSER-FACT-SHEET.pdf

- » Developing and implementing procedures and systems to improve the preparedness and response efforts of LEAs;
- » Planning for or implementing activities during long-term closures, including providing meals to eligible students and providing technology for online learning;
- » Purchasing educational technology (including hardware, software, connectivity, assistive technology, and adaptive equipment) for students that aids in regular and substantive educational interaction between students and their classroom instructors, including students from low-income families and children with disabilities;
- » Providing mental health services and supports, including through the implementation of evidence-based full-service community schools and the hiring of counselors;
- » Planning and implementing activities related to summer learning and supplemental after-school programs;
- » Addressing learning loss; and
- » Other activities that are necessary to maintain operation of and continuity of services, including continuing to employ existing or hiring new LEA and school staff.

Maintenance of Equity

LEAs must meet maintenance of equity (MOEquity) requirements specified in the law to ensure that ESSER III funds are not used to supplant state and local funding, particularly in high-poverty schools. Under the MOEquity requirement, LEAs must not reduce state and local per pupil funding in its high poverty schools by more than the per pupil reduction for all LEA schools. Similarly, LEAs must not decrease full-time equivalent (FTE) staff per pupil ratios in high-poverty schools by more than the reduction for all schools in the LEA. LEAs must meet these requirements in both fiscal years 2022 and 2023.

Other Resources

Federal Register American Rescue Plan Act Elementary and Secondary School Emergency Relief Fund, April 22, 2021.
www.federalregister.gov/documents/2021/04/22/2021-08359/american-rescue-plan-act-elementary-and-secondary-school-emergency-relief-fund

Frequently Asked Questions: Elementary and Secondary School Emergency Relief Programs and Governor's Emergency Education Relief Programs, May 2021.
https://oese.ed.gov/files/2021/05/ESSER.GEER_.FAQs_5.26.21_745AM_FINALb0cd6833f6f46e03ba2d97d30aff953260028045f9ef3b18ea602db4b32b1d99.pdf

Frequently Asked Questions: American Rescue Plan, Elementary and Secondary School Emergency Relief (ESSER) Program, Maintenance of Equity (MOEquity) Requirements, June 2021.
https://oese.ed.gov/files/2021/06/21-0099-MOEq-FAQs.-FINAL.pdf

Section 2. Being Strategic in Using ESSER III Funds

This section presents eight key questions district and school decisionmakers should ask as they are planning how to use their ESSER III funds to ensure these funds are used strategically for both the near-term and long-term benefit of students.

Question 1. In what program/strategy, good, or service is your organization considering investing?

This question asks you to identify the specific investment or investments your district is considering. You may approach this task in several different ways:

» Assess a single program, such as a new, expanded after-school program.

» Assess multiple alternatives of the same program, for example several different models of after-school programs.

» Assess and prioritize multiple investments. For example, your district may have multiple investments it wants to make using ESSER III funds. You may use the Decision Guide to assess each investment and prioritize (or change or drop all together) until the funding is exhausted.

Question 2. Which ESSER priority or priorities will this investment address?

Use this question to align your investment with any of the allowable uses described in the APR legislation and regulations.

Question 3. Does or could this investment address other school or district priorities?

This question gets at a key strategy behind the development of this Decision Guide. Can an investment using ESSER III funding also be leveraged in a sustainable manner to support long-term district goals and improvement? Can ESSER III resources provide the time and space for your district to act on existing priorities and improvement plans or to re-examine how it approaches its instructional program or district operations?

Question 4. How will this investment address your school's or district's priorities?

An important consideration is how this investment will help your district achieve its goal or priority, or meet its improvement expectations (this also applies to how it will help address the ESSER priority in Question 2). Thinking concretely about how this investment will lead to the desired outcome and will improve the chances of the change being a success. A process for doing this is to develop a theory of action.

Key Concepts Introduced in Question 4

Theory of Action

A theory of action can take many forms, but is essentially an "if – then" statement: if we take action X then we will achieve outcome Y. A theory of action should include the following components:

» A clearly stated outcome or objective.

- The specific actions or strategies the district will take to achieve the outcome or objective.
- Evidence of improvement that consists of specific benchmarks to be attained. This evidence should be data-driven.
- A statement of the ultimate goal to be achieved. The goal or goals should also consist of data-driven benchmarks.

Continuous Improvement

Continuous improvement is an improvement cycle in which districts:

- Identify a need;
- Select one or more strategies to address the need;
- Establish a goal at which point the need has been met;
- Set data-based benchmarks for measuring progress toward the goal;
- Create a plan for revising the strategy (or even terminating the strategy and adopting another) if sufficient progress toward the goal is not met; and
- Start the cycle over by once again setting data-based benchmarks.

The continuous improvement process is closely intertwined with the strategy's theory of action, in which districts identify a priority need, select a strategy for addressing it, and then set a goal and data-driven benchmarks for measuring progress toward the goal.

Other Resources

Theory of Action Statements – Examples. (2014). Illinois State Board of Education. These examples are included as part of a useful improvement planning template. https://www.isbe.net/Documents/sig-theory-of-action-statements.pdf

Why Write a Theory of Action? A simpler version of a theory of action from the Rhode Island Department of Education. https://www.ride.ri.gov/Portals/0/Uploads/Documents/Information-and-Accountability-User-Friendly-Data/Transformation/Theory-Action-One-Pager.pdf

Continuous Improvement in Schools and Districts: Policy Considerations. McREL International. https://files.eric.ed.gov/fulltext/ED557599.pdf

Continuous Improvement in Education. (2013). Carnegie Foundation for the Advancement of Teaching. https://www.carnegiefoundation.org/wp-content/uploads/2014/09/carnegie-foundation_continuous-improvement_2013.05.pdf

Two Wisconsin School Districts Pave an Early Path to Continuous Improvement. (2017). Carnegie Foundation for the Advancement of Teaching. https://www.carnegiefoundation.org/blog/two-wisconsin-school-districts-pave-an-early-path-to-continuous-improvement/

Question 5. What evidence was used to support the selection of this alternative?

Because this Decision Guide is focused on strategies, programs, or interventions that impact a district's instructional program, effectiveness generally refers to the impact of the initiative on student learning, for example, improvements in reading or mathematics achievement. However, since ESSER III funds may be used for non-instructional activities, such as purchasing sanitizing supplies or air filters or exchangers for reducing airborne contagions, the evidence of effectiveness of a wider range of outcomes may also be considered by a school or district. Nevertheless, this discussion of evidence will focus solely on initiatives related to improving instruction and students' academic outcomes.

Effectiveness or "Impact" Research

The effectiveness of educational strategies, programs, or interventions is determined through research studies aimed at measuring their "impact." Impact refers to the effect the intervention has on student learning. For example, how much a supplemental reading program increases students' scores on a reading assessment. Impact studies may vary in quality. Some factors to consider include:

- How many students were included in the study? Typically, the more the better.
- What method was used for the study? The gold standard is randomized control trials where participating students are randomly assigned to a treatment group (they are taught using the program being studied) and a control group (they are not taught using the program of interest, but instead using standard materials). Quasi-experimental designs may also be found in high quality studies. Quasi-experimental design studies do not use random assignment but use other means to identify treatment and control groups. Some examples of quasi-experimental design studies include regression discontinuity, interrupted time series, or natural experiments.[2]
- Was the study conducted internally by the developer/vender of the product or by external researchers? Developers of educational programs or interventions often conduct their own impact studies to demonstrate effectiveness. It is generally preferable if an independent team of researchers conducts the study. However, if the results of the study were published in a peer-reviewed journal then the results are likely valid regardless of who conducted the study. Another check is if an independent study team subsequently conducted a similar study that showed similar results.
- Another factor to consider is whether the context of the districts, schools, and students participating in the study are similar to those of your district. A program that is effective for one group of students may not be similarly effective for another. Ideally, study results of the program or intervention show it is effective for students similar to those your district serves.

The U.S. Department of Education's Institute of Education Sciences (IES) provides several useful practitioner-oriented guides to evaluating the rigor of impact studies. These include:

[2] For additional information about quasi-experimental studies see https://journals.sagepub.com/doi/full/10.3102/0091732X20903302

- Institute of Education Sciences. *Level of Evidence in What Works Clearinghouse Practice Guides*. https://ies.ed.gov/ncee/wwc/Docs/Multimedia/wwc_pg_loe_022718.pdf
- Institute of Education Sciences. *Using the WWC to Find ESSA Tiers of Evidence*. https://ies.ed.gov/ncee/wwc/Docs/multimedia/ESSA_508c_Infographic.pdf
- Institute of Education Sciences. *Using the WWC to Find Strong to Moderate Evidence*. https://www.youtube.com/watch?v=1fnKv1PBrBQ
- U. S. Department of Education, Institute of Education Sciences, National Center for Education Evaluation and Regional Assistance. (2003). *Identifying and Implementing Educational Practices Supported by Rigorous Evidence: A User Friendly Guide*. Washington, DC: Author. https://ies.ed.gov/ncee/pdf/evidence_based.pdf

Sources of Effectiveness or "Impact" Research

There are numerous sources that publish the results of impact studies of various educational strategies, programs, and interventions. However, some sources may be more accessible and reliable than others. These include the U.S. Department of Education's What Works Clearinghouse (WWC), peer reviewed academic journals, the literature supporting the evidence-based education funding model, and program developers/vendors. Each is described briefly below.

What Works Clearinghouse (WWC). The WWC is a website maintained by the U.S. Department of Education's IES (https://ies.ed.gov/ncee/wwc/). WWC reviews research studies to assess the quality of the studies and subsequently the validity and reliability of their results. WWC assigns one of three ratings to the studies it reviews: 1) Meets WWC Standards without Reservations (highest rating), 2) Meets WWC Standards with Reservations, and 3) Does Not Meet WWC Standards. WWC reviews and rates studies from a wide range of topic areas, including literacy, math, science, student behavior, high school completion, and teacher quality. It is also possibly the most accessible source of high-quality evidence of effectiveness.

Other Resources

What is the WWC?
https://ies.ed.gov/ncee/wwc/Docs/referenceresources/wwc_info_what_061015.pdf

How the WWC Rates a Study.
https://ies.ed.gov/ncee/wwc/Docs/referenceresources/wwc_info_rates_061015.pdf

Finding Evidence with the WWC: A Webinar for Educators.
https://www.youtube.com/watch?v=FBKhlG1WkYc

Peer Reviewed Academic Journals. Numerous peer reviewed academic journals publish the results of impact studies in education. Many specialize by subject or topic area (for example *The Reading Teacher*, *Journal for Research in Mathematics Education*), while others generalize across topics (*Educational Researcher*, *Educational Evaluation and Policy Analysis*). See the IES ERIC website for a comprehensive list of education journals that can be filtered for peer review status and full text availability (https://eric.ed.gov/?journals). ERIC also provides an excellent, searchable source of articles that were originally published in many of these academic journals (https://eric.ed.gov/).

Developers/Vendors. Evidence webpages for:

- Mifflin Harcourt Saxon Math: https://www.hmhco.com/programs/saxon-math#research-results
- Read 180: https://www.hmhco.com/programs/read-180-universal#research-results
- Success for All: https://www.successforall.org/results/evidence-for-success/

Question 6. Is the alternative the most cost-effective or among the most cost-effective alternatives?

Districts making decisions about investments in instructional or operational improvements should take into consideration both the cost of alternative investments as well as their potential effectiveness for achieving district goals. This likely involves assessing tradeoffs offered by alternatives between affordability and results. For example, the most affordable alternative may not produce sufficient results for achieving a desired level of improvement. On the other end of the spectrum, another alternative may be extremely effective but unaffordable. Cost-effectiveness analysis is a method for finding the sweet spot between the two.

Cost-effectiveness analysis is used to compare the costs and effectiveness of two or more program alternatives with similar objectives. This analysis requires both a detailed accounting of the costs of each alternative and a common outcome that can be compared across the alternatives under consideration. The product of this type of study is a cost-effectiveness ratio for each alternative. All other considerations being equal, the most desirable alternative is the one with the lowest cost-effectiveness (CE) ratio—that is, the lowest cost per unit of improvement.

The basic steps involved in carrying out a cost-effectiveness study include:

- Identifying the available alternatives for achieving a given outcome.
  - For example, multiple interventions for improving grade 3 reading performance.
- Identifying a common impact measure.
  - For example, changes in scores on a specific reading assessment (or equated assessments) for each alternative.
- Calculating the costs of each alternative.
- Calculating the CE ratio of each alternative.
- Comparing CE ratios to identify the program that best balances cost and results for your district's needs.

Other Resources

Center for Benefit-Cost Studies of Education: https://www.cbcse.org/

Cost-Benefit Analysis and Cost-Effectiveness Analysis. (2015). Center for Benefit-Cost Studies of Education: https://www.cbcse.org/publications/cost-benefit-analysis-and-cost-effectiveness-analysis

Levin, H.M., McEwan, P.J., Belfield, C., Bowden, A.B., and Shand, R. (2018). *Economic Evaluation in Education: Cost-Effectiveness and Benefit-Cost Analysis* (3rd ed.). Los Angeles, CA: Sage.

Question 7. What is the cost of this alternative and what are the sources of funding to pay for it?

When considering the cost of each alternative investment, it is important to consider all of the associated costs. For example, if purchasing a computer-based remedial math program, there may be the initial purchase price of the program in addition to ongoing annual licensing and/or maintenance fees. Other associated costs may include annual purchases of consumable instructional materials and additional technology for scaling up the program. Also consider whether additional staff need to be hired and if there are professional development costs for instructional staff using the program.

Another consideration is whether your ESSER III funds are sufficient to pay for all of these costs or if funding from other district sources will be needed. If this is the case, what other school or district resources are available, including reallocating funds from other, less-effective uses? Finally, as noted below, if there are recurring annual costs that will run beyond the 2022-23 ESSER III deadline, how will those costs be paid for?

Question 8. Is the alternative financially sustainable after your ESSER III funding expires?

A common phenomenon occurring with grant-funded initiatives is districts or schools implementing well planned initiatives, hiring staff, and purchasing services and materials using their grant proceeds. Unfortunately, once the grant funds expire the initiative is shuttered because no steps were taken to ensure continued financial support from other sources of funding. As districts look to develop and implement improvement initiatives, they must ensure ongoing sustainability from the beginning of the process.

In the simplest terms this likely means using ESSER III funds for one-time or limited-term purchases such as paying for staff time for planning, consulting contracts, or one-time technology or materials purchases. If ESSER III funds are used to pay for long-term costs, particularly the hiring of new staff, then provision must be made for continuing to pay for their salaries, benefits, office space, and consumable supplies from other sources once your ESSER III funds are exhausted.