Design and Implementation of the ESSA Resource Allocation Review

Lessons Learned in Utah

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Introduction

A resource allocation review (RAR) is a powerful opportunity to examine the current flow of resources as they affect students. Many states are now considering how to define and tackle RARs, including

- how to leverage existing data that inform resource allocation,
- how educators identify needs of students and staff,
- how evidence-based strategies are selected to meet those needs,
- to what degree those strategies are implemented with fidelity, and
- how all students can equitably access the resources they need.

The provisions in the Every Student Succeeds Act (ESSA) reauthorization of the Elementary and Secondary Education Act (ESEA) include (1) the requirement for states to periodically review resource allocation in local education agencies (LEAs) serving a significant number of schools identified for comprehensive support and improvement (CSI), targeted support and improvement (TSI), and additional targeted support and improvement (ATSI) and (2) the requirement that CSI and ATSI plans both identify and address local resource inequities.

ESSA requires states to periodically review resource allocation to support school improvement in schools that qualify for comprehensive and targeted support. In 2019, the Resource Allocation Review Community of Practice (RAR CoP) of the United States Department of Education (the Department) provided a useful foundation. The RAR CoP calls upon state agencies to connect the additional resource inequity provisions outlined in ESSA and align resource allocation reviews with the comprehensive school improvement. Building on the guidance offered by the RAR CoP, Utah, with the support of WestEd's Region 15 Comprehensive Center (R15CC), was among the first states to design and implement an RAR process.

> **SEAs** must review resource allocations to support school improvement in districts with a significant number of schools identified for improvement (§1111[d][3][A][ii]).

LEAs with schools identified for comprehensive improvement must identify and address resource inequities within their district (§1111[d][1][B][iv]).

Schools identified for improvement based on low performance for individual groups of students must identify and address resource inequities within their school (§1111[d][2][C]).

Adapted from EdTrust, Resource Allocations Reviews: A Critical Step to School Improvement, 2014

In March 2020, the R15CC, in partnership with the Utah State Board of Education (USBE), began designing an RAR process to help schools eligible for comprehensive improvement support. Because we were co-designing the RAR from scratch, we chose to incorporate the principles of design thinking[1] to guide our work. We generated agreement as a team from the beginning that we wanted to take our time to design a process to address resource inequities that would be meaningful and helpful to LEAs and schools. In addition, we established guiding principles for USBE's RAR design process, which include **being comprehensive, collaborative, and systemic; minimizing the burden on local school agencies; and communicating the why for equity**.

By leveraging existing LEA and school-level data as well as required planning and reporting processes, USBE sought to design a process to support educational leaders in identifying and implementing strategies for equitable resource allocation. This process also aimed to facilitate the communication of promising practices that could be scaled throughout the state. Additionally, USBE's RAR process aimed to align existing planning, implementation, progress monitoring, and reporting requirements for all LEAs and schools. Furthermore, it aims to continue building state capacity to guide LEA and school leaders to create connections between identified needs, evidence-based strategies, and methods to equitably allocate resources.

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[1] Design thinking is an iterative process that seeks to understand the end-user experience, challenge assumptions, and refine problems before attempting to implement a solution or process. https://web.stanford.edu/~mshanks/MichaelShanks/files/509554.pdf

Five Lessons for Implementing a Resource Allocation Review

In transitioning from design to implementation, we can share some discoveries and lessons learned that may be useful to other states. It is worth noting that USBE successfully piloted and tested the state's RAR process with LEAs and schools in the spring of 2023.

Bring together a cross-department state team to design and deliver the RAR.

The team should encompass various key departments, including staff from the offices of the superintendent, student support services, teaching and learning, special education, state and federal programs, educator effectiveness, financial operations, assessment and accountability, and information technology. Leveraging the perspectives of multiple departments in the design process enables the state education agency (SEA) to engage in a way that encourages creativity and shared responsibility. This collaborative approach ensures that the RAR process reflects a comprehensive understanding of the diverse needs and priorities within the education system, ultimately leading to more effective resource allocation and support for schools.

- **Tip**: Utilize existing state-level academic, engagement, and financial data to produce valuable comparisons to inform the design of the reviews.

- **Tip**: Connect relevant reporting requirements, such as a statewide comprehensive needs assessment, Individuals with Disabilities Education Act (IDEA) indicators, and other federal or state programs, to align the planning process.

- **Tip**: Leverage the expertise of the National/Regional Comprehensive Centers, Council of Chief State School Officers, ESEA Network, and other experts to help guide and facilitate the design process.

Establish a shared vision that supports educational leaders with the understanding that equal does not mean equitable.

When it comes to addressing resource inequities, each of us, as individuals, will come into this space with very different lived experiences. Establishing a shared vision that builds awareness and recognition—that equal does not mean equitable—enables us to create a space where we can learn and grow together as we work to design a process that addresses resource inequities and improves the educational experience of all students. SEAs must empower educational leaders across the entire system—within the SEA and throughout the state—with this shift in mindset. This shift is necessary to develop a process that identifies equitable resource allocation methods that address student needs. Through a shared vision, educational leaders can ensure that all available resources are allocated equitably across the district and within each school to expand student access to all educational opportunities.

- **Tip**: Conduct a gap analysis on LEA and school leaders' understanding of equitable resource allocation methods to determine capacity building needs to support a shift in mindset.
- **Tip**: Develop ongoing training and technical assistance opportunities that focus on developing an equity mindset.
- **Tip**: Design a process that engages education leaders in an ongoing exercise in equity, not another exercise in compliance.

Ensure that the RAR includes educational resources beyond just funding to ensure the process lends itself to improve the educational experience of students.

Educational resources include human resources, organization of time, materials and supplies, program services, and community partnerships.[2] Educational leaders must be empowered to strategically coordinate these resources to effectively meet the needs of students and foster the professional growth of teachers. To understand funding and how resources beyond funding can be maximized to better serve students will be the key to transformation.

- **Tip**: Ensure that all SEA staff understand how educational resources can be coordinated, including how state and federal funds can be blended or braided to support the design and delivery of program services.

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[2] Tayor, T., & Bowman, A. (2024). *Identifying Resource Inequities*. Region 15 Comprehensive Center, WestEd.

- **Tip**: Provide training to educational leaders on how to identify and coordinate available resources to meet the needs of low-performing students.
- **Tip**: Ensure educational leaders can understand the dimensions of resources in terms of adequacy, availability, allocation, and application.

Design a service-oriented process.

States can draw from principles of continuous improvement and design thinking to create a process that supports educational leaders from an end-user perspective during each stage of the design process. Taking time to engage LEAs and schools in the design, pilot, and test phases of a process prior to rolling it out will mitigate frustration and generate a better understanding of immediate challenges that can be addressed in the short term and systemic challenges that can be addressed in the long term.

- **Tip**: Ensure the process is designed to minimize burden and that the process is meaningful to educational leaders. For example, ask participating LEAs and schools to signal the best time for conducting the review that aligns with their local planning and budget development processes.
- **Tip**: Engage in communities of practice discussions on how educational leaders are strengthening connections between identified needs, evidence-based strategies, and resource allocation methods.
- **Tip**: Include district and school leaders in the RAR design process to develop tools, resources, and provide feedback to shape technical assistance to successfully implement the process.

Design the review process to track and monitor progress of resource allocation methods over time, adapt to current needs of educational leaders and students, and share promising practices with other states.

States should ensure the process reflects how resource allocation methods will be tracked and monitored to demonstrate impact on student outcomes. To ensure the process is meaningful to LEA and school leaders, include an internal review to adapt the RAR process to the changing needs of educational leaders and students. Ensure that new allocation methods and planning approaches, along with their measured impact, are communicated to other LEA and school leaders, while also sharing promising practices with the broader educational field.

- **Tip**: Spotlight connections between improvements in student outcomes and resource allocation methods across each level of the system.

- **Tip**: Design a process that all LEAs and schools can participate in regardless of improvement status.
- **Tip**: Encourage leaders across the entire system to share promising practices and contribute to a collection of evidence-based resource allocation methods that can be adapted at any level of the system.

R15CC created an infographic that describes an effective resource allocation review process.

Considerations for Implementing the RAR Recommendations

In July 2023, the Department issued a Dear Colleague Letter (DCL) offering nonregulatory guidance to address resource equity provisions under Title I, Part A. The accompanying crosswalk (Table 1) includes the Department's recommendations, including considerations based on the technical assistance R15CC provided while designing the RAR from 2020 to 2023. The resource equity provisions are referenced in the table as follows:

A. State Resource Allocation Review (ESSA § 1111[d][3][A][ii])

B. Identifying and Addressing Resource Inequities in CSI and ATSI Plans (ESSA § 1111[d][1][B][iv] and [2][C])

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Table 1. Dear Colleague Letter Crosswalk of Recommendations and Considerations

DCL#	U.S. Department of Education recommendations	R15CC considerations
A.1	Determine LEAs serving a "significant" number of identified schools by using a threshold that includes a percentage and/or a number.	When defining what "significant" means, consider the different types of schools served in the state (i.e., size, location, grade span; rural, suburban, urban; alternative, charter, traditional). • What impact does this have on the types of resources available to schools? • What impact does this have on how resources can be allocated? • What do interest holders need to learn about how the state serves these schools?
A.2	Consider a broad variety of factors when defining "resources" that includes both financial and nonfinancial resources (e.g., staffing, access to coursework) from local, state, and federal sources.	When defining what "resource" means, consider the different types of resources LEAs and schools need to implement the design and delivery of programs. • How does the state define financial and nonfinancial resources? • How does the state allocate financial and nonfinancial resources? • How can the state reallocate based on LEA and school needs?
A.3	Align the timing for conducting a resource allocation review with the state's school identification timeline such that a review is being conducted at least every 3 years.	Organize LEAs and schools into cohorts to ensure the timing for conducting an RAR is meaningful and sustainable and invite LEA and school leaders to share when the RAR would best support the planning process. • What existing LEA and school planning processes align with the RAR? • What existing reviews are being conducted at LEAs and schools? • What existing reviews most align with the RAR?

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A.4	Integrate the resource allocation review into existing processes for monitoring, school improvement, and budgeting.	Reduce administrative burden across the system by integrating the RAR as part of the continuous improvement planning process for all LEA and school leaders. • What elements of the RAR align with the budget development process? • How can the RAR be embedded in progress monitoring or annual updates for LEA and school plans? • How can the RAR be used to address other review requirements?
A.5	Compare financial and nonfinancial resource allocation data both across and within LEAs.	When comparing resource allocation data, ensure "resources" have been defined (recommendation A.2). Financial resource allocation data should include revenue and expenditures by program (resource), object, and function to determine trends and gaps in spending and carryover. Nonfinancial resource allocation data should include resources beyond funding. When compared across and within LEAs, consider the following: • What resources were allocated to the LEA and school? • What resources were spent by the LEA and school? • What resources are included in the LEA and school plans?
A.6	Analyze state-identified resources alongside disaggregated student demographic information and outcome measures, including measures in the state's accountability system, to determine whether resources are being distributed equitably.	Begin with existing data in the state's accountability systems; following each RAR cycle, determine how this data informs LEA and school leaders with equitable resource allocation. • How does data compare across schools within the LEA when disaggregated by student group? • How does data compare across LEAs within the state when disaggregated by student group? • What does the data indicate about areas of strength and need?
A.7	Engage with diverse stakeholders, such as LEA leaders, educators, community members, family members, students, and other education interest holders, during the RAR process to support strong implementation.	Engage interest holders throughout the needs assessment and planning process; this informs resource allocation. • How can the RAR be embedded in existing planning meetings? • How can the RAR be embedded in existing engagement sessions? • How can the RAR be used to leverage community resources?

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DCL#	U.S. Department of Education recommendations	R15CC considerations
A.8	Provide the results of the review to the LEAs and work with them to take action to address the results of the review.	Provide ongoing feedback to LEA and school leaders on the strengths and opportunities for growth. • What strengths do the LEA and school have that address resource inequities? • What are some opportunities for growth for addressing resource inequities? • What trends appear within the LEA, school, and state?
A.9	Publicly post the resource allocation review results and the tools the state used to conduct its review.	Include the results of the RAR and how the state plans to support LEAs and schools as part of routine communication. • What promising practices can be shared with LEA and school leaders when addressing resource inequities? • What tools and resources can be shared with LEA and school leaders to examine resource inequities? • How will the SEA support LEA and school leaders?
B.1	Develop or update CSI and ATSI plan templates to explicitly include identification of resource inequities and how they will be addressed.	Develop LEA and school plan templates that align the planning process across all schools. • How can LEA and school plan templates be streamlined to include the resource inequities being addressed? • How can LEA and school plan templates align the planning process? • How can LEA and school plan templates align LEA and school improvement priorities?
B.2	Implement clear processes for reviewing CSI plans to ensure each plan meets all requirements, including identifying and addressing resource inequities, and develop guidance that encourages LEAs to mirror this state-level work in the review of ATSI plans.	Develop statewide guidance to align the LEA and school planning process with improvement priorities. • How can state guidance be streamlined to support school improvement? • What existing process can the RAR be embedded in? • How can the RAR inform the State System of Support for identified schools?

DCL#	U.S. Department of Education recommendations	R15CC considerations
B.3	Provide guidance or technical assistance to LEAs and schools on identifying and addressing specific, measurable resource inequities.	ESSA requires SEAs to provide technical assistance to LEAs and schools that qualify for CSI. The RAR is one of many methods a state can use to support LEAs and schools in addressing resource inequities. • What types of communities of practice (CoP) can be created that focus on student groups or accountability indicators? • How can the SEA engage in an agencywide CoP to develop guidance and technical assistance? • What should the SEA report to state legislators about resource allocation needs for the LEA and schools?
B.4	Support LEAs and schools in selecting, implementing, and evaluating specific strategies that address identified resource inequities within a CSI or ATSI plan.	Provide ongoing targeted support to LEA and school leaders that builds on existing strengths and opportunities for growth to identify and address resource inequities successfully. • What types of targeted RAR support can be provided to LEA and school leaders? • What strategies have been effective in addressing inequities? • How can shared nationwide strategies be adapted to specific state, LEA, and school contexts and needs?

Conclusion

An RAR presents an exciting opportunity to reflect, consider, and proactively plan for how resources impact children, schools, and communities. While compliance with federal requirements is essential, an RAR has the potential to work across programs, eliminate silos, and ensure resources are allocated toward the success of all students. As SEAs progress with implementing and ongoing improvement of the RAR process, it is important to consider what your SEA requires to ensure the continued success and sustainability of this process as a standard practice to address resource inequities for our most vulnerable students.