

PART C: USES OF ELEMENTARY AND SECONDARY SCHOOL EMERGENCY RELIEF FUNDS

Section 18003 of Division B of the CARES Act provides in relevant part that grants awarded under the Elementary and Secondary School Emergency Relief Fund be used to support the ability of local educational agencies (LEAs) to continue to provide educational services to their students. The Department requests the following:

1. Information that the SEA may request LEAs to include in their subgrant applications to the SEA.

Iowa's Response

Iowa's process for awarding subgrants is systematic and targeted. LEAs will provide assurances to the Iowa Department of Education (IDOE) as required by the CARES act and will provide specific information regarding which allowable categories of expenditure under the CARES act they intend to spend resources. Specifically, districts in their application to the IDOE will note which areas of allowable funding they intend to spend funds on and how many of their funds they will spend on each activity. Allowable areas LEAs may select from come verbatim from the CARES act and include:

- **Any activity** authorized by the **Elementary and Secondary Education Act (ESEA)** of 1965 (ESSA), **Individual with Disabilities Education Act (IDEA)**, **Carl D. Perkins Career and Technical Education Act** of 2006 (Perkins V), and **McKinney-Vento Act** (Title VII, Part B).
- **Coordinating preparedness and responses efforts** of LEAs with state, local, tribal, and other relative agencies to improve coordinated responses to prevent, prepare for, and respond to COVID-19.
- **Providing principals and other school leaders with the resources** necessary to address the needs of their individual schools.
- **Activities to address the unique needs**, including how outreach and service delivery will meet the needs of the following:
 - Low-income children or students
 - Children with disabilities
 - English learners
 - Racial or ethnic minorities
 - Students experiencing homelessness
 - Foster care youth
- **Developing and implementing procedures** and systems to **improve the preparedness** and response efforts of LEAs.
- **Training and professional development** for LEA staff on sanitation and minimizing the spread of infectious diseases.
- **Purchasing supplies** to sanitize and clean LEA facilities.
- **Planning for and coordinating during long-term closures**, including for how to:
 - Provide meals to eligible students
 - Provide technology for online learning to all students
 - Provide guidance for carrying out requirements under IDEA
 - Ensure other educational services can continue to be provided consistent with all federal, state, and local requirements
- **Purchasing educational technology** (including hardware, software, and connectivity) for students who are served by the LEA that aids in regular and substantive education interaction between students and their classroom instructors, including low-income students and students with disabilities, which may include assistive technology or adaptive equipment.
- **Providing mental health services and supports.**
- **Planning and implementing activities related to summer learning and supplemental after school programs**, including providing classroom instructor or online learning during the summer months and addressing the needs of the following:

- Low-income students
- Students with disabilities
- English learners
- Migrant students
- Students experiencing homelessness
- Children in foster care

Other activities that are necessary to maintain the operation of and continuity of services in LEAs and continuing to employ existing staff of the LEA.

Application for these funds are being built into our state's Consolidated Accountability and Support Application (CASA). This is a typical process for Iowa and LEAs are able to communicate both programmatic choices as well as provide budgetary information to the IDOE in one place. Additionally, LEAs are able to provide required reports on their actual spending and the timelines for their spending within this application. LEAs will provide an initial application to the IDOE and will be allowed to revise their budgets and spending priorities (within the parameters of the CARES act) over time as need continues to evolve in their districts. The IDOE will review and approve any significant changes LEAs make beyond their initial applications to both support LEAs in their planning and implementation, as well as providing appropriate oversight on uses of funding. It is anticipated that LEAs will spend their allocations at varying rates during the CARES spending window depending on local need and identified local priorities. Throughout the grant period, LEAs will provide required reports to the IDOE who will aggregate across all of our LEAs and provide required quarterly reports to USED.

LEA Identification of Highest Need Areas Related to COVID-19. To help determine areas of most significant need during the COVID-19 pandemic, Iowa is asking all LEAs to do a "Return to Learn" plan. IDOE is developing a structured tool that each subrecipient will complete and submit. This planning process requires that each LEA consider the following characteristics of schooling in developing their plan for educating their students into next school year and through the remainder of the pandemic.

There are six areas all districts must consider in developing a *Return to Learn Plan* in the current COVID-19 context:

1. **Leadership.** This section includes: A. Developing the Return to Learn Plan, and B. District/Building Calendar Changes, C. Privacy/FERPA, and D. Emergency Learning due to resurgence of COVID-19.
2. **Health and Safety.** This section includes: A. Mitigation strategies, B. Monitoring the health and safety of teachers, staff and students, and C. Workplace safety.
3. **Academic Content Standards/Learning Requirements.** This section includes: A. Assessment of student learning needs, B. Appropriate curriculum matched to student needs, C. Effective instruction based on the district delivery and support model.
4. **Social-Emotional-Behavioral Health (SEBH).** This section includes: A. Supporting teacher/staff SEBH needs, B. Supporting learner SEBH needs, and C. Ensuring families have access to needed resources.
5. **Organizational Structure.** This section includes: A. Attendance, B. Promotion and grades, C. Graduation requirements, and D. Communication and logistics.
6. **Equity.** This section includes information on access and support for: A. Students on IEPs, B. Students who are English learners, C. Students at-risk, D. Students living in Poverty, and E. Students who are Talented and Gifted.

It is expected that each district will make ongoing decisions about their areas of highest needs related the COVID-19 pandemic based on consideration of these data. LEAs will then examine how best to allocate their district resources – including issues regarding the manner of provision of these educational services (typical instruction at school, learning at home, or a combination of approaches). LEAs will consider the extent to which the LEA intends to use ESSER funds to promote remote learning in the context of which models of instructional provision selected and the additional data collected for their Return to Learn plan. An example of the level of detail that Iowa will be asking each LEA to consider in their planning is contained at the end of this document (Appendix a). We chose area 2 above “Health and Safety” as an exemplar. Each of the six areas of the tool will be fleshed out with a similar level of detail in Iowa’s Return to Learn template, and in turn in LEAs Return to Learn plans. The final return to learn tool will be complete and out to districts the week of May 4, 2020, and will be due back to the IDOE by July 1, 2020.

It is important to note that Iowa’s process for disseminating ESSER funds to LEAs will include a robust consultation process between each LEA and the nonpublic schools within the LEA to ensure that nonpublic students receive equitable services. Our state Ombudsman has put together a consultation process, similar to the LEA/Nonpublic consultation process used under ESEA for use with ESSER funds. Representatives from LEAs and Nonpublic schools will sit down in consultation to discuss and determine what equitable services will be provided to nonpublic students, and on what timeline. In cases where disagreements may arise, our state will use our structured complaint resolution process headed up by our state Ombudsman.

2. The extent to which the SEA intends to use any portion of its SEA reserve (up to 10 percent of its ESSER Fund award) to support:

- **technological capacity and access – including hardware and software, connectivity, and instructional expertise – to support remote learning. If so, please describe the strategies the SEA intends to use to serve disadvantaged populations listed in Sec. 18003(d)(4) of the CARES Act; and**
- **remote learning by developing new informational and academic resources and expanding awareness of, and access to, best practices and innovations in remote learning and support for students, families, and educators.**

Iowa’s Response

The IDOE intends to use 10% of Iowa’s ESSER Fund Award to support Districts’ needs at a state-level. At this time, a definitive decision has not been made on specifically which needs will be addressed. However, we are in the middle of collecting systemic data from every LEA on their current needs and biggest roadblocks to providing a high quality, equitable education to every student in their district during the COVID-19 pandemic. Our data collection from districts will conclude in a matter of days, at which point, Iowa will be in a data-based position to discuss the greatest COVID-19, education-related needs across the state. From a preliminary examination of our data, is clear that many LEAs have identified equity in access to technology (internet access and device access) as one of their biggest barriers to remote learning. Moreover, LEAs are identifying significant professional learning needs for their teachers to be able to use distance learning platforms, strategies and techniques effectively to support students and their families. Once our analysis of our data is complete, Iowa intends to partner with our Intermediate Unit System (Area Education Agencies: AEAs) to determine the highest leverage strategies that can be implemented systemically and uniformly across the state to support effective distance learning for all students. Each LEA in Iowa is served by an AEA, so Iowa has a well-developed delivery infrastructure in place to deliver on selected strategies. Moreover, the AEAs have at the core of their mission promotion of equity in learning for all students, so implementation of any strategies selected will be done with a close eye to equitable access for all Iowa students.

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Iowa intends to provide a detailed description of the strategies selected for the use of this 10% reserve fund with the report due to USED in 60 days. In this report, we will provide a detailed description of the proposed uses of the funds, a detailed budget associated with that plan as well as an Internal Control and Subrecipient Monitoring Plan to ensure funds are used across our system for allowable purposes.

Appendix A
 Exemplar Section Iowa’s Return To Learn Template

Health and Safety

The health and safety of Iowa’s teachers, staff, students, and families are first and foremost in planning for the 2020-2021 school year. There are several considerations that cut across delivery models; however, Combination and Typical Instruction pose the most challenges and need for careful consideration and planning. These considerations are not a replacement of a district’s crisis or safety plan(s) and in no way an exhaustive list of health and safety needs – rather these are specific additional considerations due to the current COVID-19 crisis that should be noted in any *Return to Learn Plan*.

TABLE 2. HEALTH AND SAFETY REQUIREMENTS AND CONSIDERATIONS

Requirement	CL	C	TI	Consideration
A. MITIGATION STRATEGIES				
1. Plan for general mitigation strategies across delivery models.	X	X	X	<ul style="list-style-type: none"> ○ Support personal protective measures such as frequent handwashing, coughing/sneezing etiquette, keeping hands away from the face. ○ Consider the use of personal protective measures as a supported culture of prevention encouraged throughout school buildings and district office for all staff and visitors. ○ Ensure personal protective equipment (PPE) is available. ○ Provide education on when PPE is necessary, how to put on/take off PPE safely, and how to properly dispose of PPE. (LINK to online learning modules for students, teachers and families) ○ Coordinate and collaborate with school health service providers and community partners regarding student and staff health and safety needs, as well as reviewing, updating, and implementing school emergency plans and provision of essential services (e.g., local public health, emergency management). ○ Ensure environmental surface cleaning is addressed on a daily basis, or more as needed, if school grounds, transportation or equipment are used. ○ Establish social distancing as needed as the norm, in a way that makes sense based on current regional ratings or guidance from public health or emergency management
2. Plan for appropriate use/handling of materials	X	X	/	<ul style="list-style-type: none"> ○ Establish a routine for wiping down materials with a solution that contains 70% alcohol in a manner that preserves the item, ○ Ensure materials are distributed/transferred in a way that supports social distancing (e.g., items placed in a neutral location, families staying in cars for transfer, receiving materials by using appropriate PPE). / This applies to Traditional Instruction for any materials distribution/transfer for students who attend school via distance methods due to health concerns.
3. Plan for in-school organizational structures that support effective mitigation strategies.		X	X	<ul style="list-style-type: none"> ○ Build in time during the day for teachers, staff and students to engage in frequent hand washing as needed as the norm, in a way that makes sense based on general health standards and current regional ratings or guidance from public health or emergency management (e.g., before entry to the school building, before/after meals, between

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				<p>classes, in the provision of providing student services, and when practicing coughing/sneeze etiquette),</p> <ul style="list-style-type: none"> ○ Ensure adequate access to hand sanitizers with greater than 60% ethanol or 70% isopropanol.
B. MONITORING HEALTH & SAFETY				
1. Plan for the general health and safety of teachers, staff and students.		X	X	<ul style="list-style-type: none"> ○ Ensure privacy and confidentiality is maintained of those seeking healthcare and those who may be part of any contact investigation. ○ Consider policies and protocols to address and counter stigma for teachers, school nurses, students and staff (e.g. race/ethnicity, teachers/students experiencing illness, or wearing PPEs, school nurses providing health services or other healthcare workers). <p>*Note that schools are not expected to screen students or staff to identify cases of COVID-19. If a school has cases of COVID-19, local health officials will help identify those individuals and will follow up on next steps.</p>
2. Plan for the health and safety of teachers and staff.		X	X	<ul style="list-style-type: none"> ○ Consider flexible sick leave and supportive policies and practices to ensure teachers/staff are enabled to remain at home when sick. ○ Establish back-up plans if teachers/staff are absent in a way that impacts learning over time. ○ Establish a process to send staff home who arrive sick as soon as possible
3. Plan for the health and safety of students.		X	X	<ul style="list-style-type: none"> ○ Refer students/staff that are considered “high risk” or immunocompromised to their healthcare provider to determine when school re-entry for their individual health concern is recommended. ○ Establish a process on what needs to occur if a student is exhibiting signs of illness, such as: <ul style="list-style-type: none"> ● Notify the school nurse the student will be sent to the office to enable the nurse to implement social distancing from students who may be in the office for routine healthcare (e.g., nebulizer treatments, dispensing of medication). ● How to send students home who arrive sick as quickly as possible ○ Consider allowing parents to send their children to school with PPE for prevention purposes. ○ Monitor the number and reason for student absences; reach out to families when absences are two or more days in a row, or are chronic to determine (a) the reason for ongoing absences, and (b) any support the student/family might need. ○ Consider supportive policies and practices for student absenteeism to students are enabled to remain at home when sick (e.g., consider discontinuation of attendance awards and incentives, support learning to the extent possible if the student is absent for long periods, institute more flexible consequences). ○ When absenteeism is high due to seasonal or other illness, communicate with your local public health department regarding decisions for school closure, event cancellations

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				<p>or dismissal related to communicable disease or illness (link)</p> <ul style="list-style-type: none"> ○ Encourage reporting to the Iowa Department of Public Health if there is greater than 10% absenteeism in a school building related to illness (link in the comment). ○ Consider collaboration with the school nutrition program director to assess processes for school nutrition services (e.g. salad bar, self-serve areas, sharing tables) and options that would decrease congested areas <p>*Note that resources may not be available in the community for a care provider to be in the home or provide individualized services, especially for a student who is health compromised and concerned about contact with others.</p>
C. WORKPLACE SAFETY				
1. Plan for workplace safety if staff must enter school grounds during Continuous Learning conditions.	X			<ul style="list-style-type: none"> ○ Determine essential staff for essential functions who may need to meet on school grounds. ○ Ensure individuals who meet on school grounds: <ul style="list-style-type: none"> ● Practice appropriate social distancing where it makes sense in a way that makes sense based on current regional ratings using instruction and guidance from local public health or county emergency management (e.g., remain 6 feet apart, no more than 10 individuals or a number determined by the department of health or state emergency command center for safety), and ● If appropriate, have access to PPE, and education on how to use PPE (LINK to teacher/staff online module on mitigation strategies) ● If meetings occur on school grounds, ensure environmental surface cleaning occurs where individuals have frequented. For example, clean high touch surfaces such as tables, doorknobs, light switches, countertops, handles, desks, phones, keyboards, toilets, faucets, sinks, water fountains, etc.
2. Plan for adequate health resources and support throughout the district.		X	X	<ul style="list-style-type: none"> ○ Coordinate with the district/school emergency operations plan to determine a team to do the following (the team must include district/school nurse): <ul style="list-style-type: none"> ● Review and address school nurse PPE supply needs, ● Review and address custodial staff PPE and appropriate cleaning supply needs for ongoing environmental surface cleaning, ● Review and support identified students with chronic health conditions placing them at risk. ● Review and address encounter data results related to health office visits where students were returned back to class, those who were sent home and students who required emergency services related to student health needs, ● Communicate and coordinate directly with local public health prior to releasing communication regarding potential communicable disease

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				outbreak in your school to include messaging regarding closure, dismissal or event cancellation. *Note that all communications regarding communicable disease must be in alignment with FERPA and ADA
3. Ensure the school health office has what it needs to support optimal student care		X	X	<p>Consider:</p> <ul style="list-style-type: none"> ○ School nurses have the PPE needed to provide health services safely. ○ The structure of the health office includes: <ul style="list-style-type: none"> ● One space for healthy students coming for routine needs, medication, diabetic checks, asthma management, first aid/injury assessment, etc. ● Second space for students and/or staff who are ill or need evaluated for possible infection ○ Foot traffic in the health office and coordinate with school nurse ○ Ventilation of the health office (Link in comments)
4. Ensure custodial staff are supported to ensure optimal environmental cleaning		X	X	<p>Consider:</p> <ul style="list-style-type: none"> ○ Custodial staff have the personal protective equipment and appropriate cleaning supplies needed for ongoing environmental surfaces cleaning ○ Custodial staff have ongoing education on how to appropriately use PPE and cleaning supplies. *Note that cleaning products should not be used near children, and staff should ensure that there is adequate ventilation when using these products to prevent children from inhaling fumes, ○ The time and routine needed for custodial staff to not only facilities being routinely cleaned to maintain the health and safety of teachers, staff, students, and the community, but also buses to be cleaned between routes, and prior to and after transport.
5. Plan for appropriate building-wide social distancing as needed		X	X	<p>Consider:</p> <ul style="list-style-type: none"> ○ Reducing the load on common areas through altered scheduling ○ Increasing space among students during in-person instruction. ○ Community building use outside of school hours and custodial needs ○ Building access points of delivery and receiving for schools to reduce outside traffic in the school building