U.S. Department of Education - EDCAPS
G5-Technical Review Form (New)

Technical Review Coversheet

Applicant: West Virginia Department of Education (S425B200013)
Reader #1:   **********

	Points Possible	Points Scored
Questions		
Selection Criteria		
Highest Coronavirus Burden		
1. Coronavirus Burden	20	20
Quality of Project Services and Project Plan		
1. Project Services/Plan	35	25
Quality of Management Plan / Adequacy of Resources		
1. Management Plan/Resources	25	15
Sub Total	80	60
Total	80	60

Technical Review Form

Reader #1:   **********

Applicant: West Virginia Department of Education (S425B200013)

Questions

Selection Criteria - Highest Coronavirus Burden

1. **A: Highest Coronavirus Burden (up to 20 Points)**

   (2) The extent to which the applicant has a high coronavirus burden based on indicators and information factors identified by the applicant in response to Application Requirement 3.   (up to 20 points)

   Strengths:

   The applicant provides information about the coronavirus response, which included closing schools, revealed the disheartening realities of inequity and disparity among students and families when delivery of remote learning began. The applicant shows burden of the coronavirus response placed 100% of student learning remotely with 25% of them with no devices and 30% with inadequate or no connectivity. Economically, there is a 500M budget gap. e Also, indicated by the applicant, 20,000 teachers reported having connectivity and technology-related issues. This included over 1,300 who didn't have an appropriate device, 926 with no internet access at home, 3,141 had poor internet service in the home, and 823 had no internet or cellular service (p. e18).

   While CARES funding will play a major role in working toward a solution, the applicant states additional resources will be needed to accomplish equity goals due to the scope of the problems the state faces.

   Weaknesses:

   None Noted

Reader's Score: 20

Selection Criteria - Quality of Project Services and Project Plan

1. **B: Quality of Project Services and Project Plan (up to 35 points)**

   The Secretary considers the quality of project services and project plan.

   In determining the quality of the project services and project plan, the Secretary considers the quality and sufficiency of strategies for ensuring equal access and treatment for eligible project participants who are members of groups that have traditionally been underrepresented based on race, color, national origin, gender, age, or disability. (up to 5 points)

   In addition, the Secretary considers--

   (1) The extent to which the proposed project is an exceptional approach to absolute priority being addressed and includes a detailed project plan for addressing the absolute priority. (up to 10 points)

(2) The extent to which specific gaps or weaknesses in services, infrastructure, or opportunities have been identified and will be addressed by the proposed project to respond to the needs of students. (up to 10 points)

(3) The likelihood that the services to be provided by the proposed project will expand access to remote learning options and lead to improvements in student outcomes. (up to 5 points)

(4) The extent to which the services to be provided by the proposed project reflect up-to-date knowledge from research and effective practice. (up to 5 points)

Strengths:

2 points.The applicant plans include reaching public and nonpublic students who are served through special education and other support services to ensure equal access to the online homework helpline, parent modules, and student elective coursework created as part of the project (p. e10). The applicant proposes two of the educator modules specifically address topics related to remote learning strategies for engaging students who are traditionally underrepresented.

10 points. (1)The WV project focuses on providing educator professional development via higher ed graduate level training modules, parent training modules (p. e35), and student modules for course credits. The modules would be available to all public and nonpublic schools, families, and students. "The goals of the West Virginia grant project include (1) building teacher capacity to improve their delivery of remote learning, (2) support parents and other care providers of K-12 students engaged in remote learning, and 3) provide appropriate coursework to students to improve their remote learning skills for elective credit" (p. e15). The applicant's proposal to create learning opportunities for enhancing remote learning effectiveness for educators, parents, and students is a holistic approach that addresses the learning curve for everyone involved in supporting effective remote learning.

6 points. (2) This project identifies and addresses gaps that exist in teacher remote teaching skills, parent engagement, and students' abilities to make the most of remote learning.

The goals will be achieved by 1) building capacity of teachers to learn and utilize best practices with remote learning; 2) providing a digital teaching credential to educators who demonstrate proficiency through the successful completion of 18 hours of graduate level coursework; (3) imbedding remote learning instruction and practice into pre-service teacher education coursework, teacher induction requirements, and alternate pathways to licensure programs; (4) providing resources for parents to support K-12 students as they engage in remote learning; (5) delivering remote learning opportunities to students for course credit; and 6) provide appropriate technology tools to schools to implement newly acquired learning (p. e15).

5 points. (3) As people support what they help create, engaging classroom educators in the planning process (p. e138) will give West Virginia teachers more confidence in the value of the modules. Providing resources for parents to support K-12 students as they engage in remote learning, delivering remote learning opportunities to students for course credit, and providing appropriate technology tools to schools to implement newly acquired learning. (p. e15). This will expand access to remote learning options and have the potential to improve student outcomes.

2 points. (4) This is a holistic approach to equipping stakeholders to be more proficient in navigating the world of remote learning by providing training modules for educators, parents, and students. Building confidence of teachers, parents, and students to navigate remote learning settings is a strong approach to equipping those closest to the student, as well as the student him/herself to be successful when engaged in remote learning. Not only is the project holistic, the applicant plans to create modules with student developmental stages in mind (p. e28).

Weaknesses:

While there is intentionality in addressing teachers knowledge and skills regarding remote learning for students who are often underrepresented during education project planning, the parent and student modules do not appear to offer supports for students with special needs.

(2) The applicant proposal to make educator modules only available through institutions of higher education creates an equity barrier in terms of the cost of tuition. While the budget includes a line item for tuition, the plan does not indicate the infrastructure that will be in place to support the cost of tuition to the extent that ensures all teachers would have equitable access to the modules.

(4) While the higher education delivery of training modules is a research-based mode of delivery, the immediate need for teachers to be better prepared to meet student learning needs remotely for the 2020 school year is apparent from the burden statement and yet, is not addressed. The current process of building out the modules seem unnecessarily encumbered in the higher education course approval processes required for graduate credit courses. The project does not reflect up-to-date knowledge regarding more effective and efficient practices that drive educator learning.

Reader's Score: 25

Selection Criteria - Quality of Management Plan / Adequacy of Resources

1. **C: Quality of the Management Plan and Adequacy of Resources (up to 25 points)**

   In determining the quality of the management plan and adequacy of resources, the Secretary considers--

   (1) The adequacy of the management plan to achieve the objectives of the proposed project on time and within budget, including clearly defined responsibilities, timelines, and milestones for accomplishing project tasks. (up to 5 points)

   (2) The extent to which the proposed use of funds will adequately support the proposed project. (up to 5 points)

   (3) The extent to which the costs are reasonable in relation to the objectives, design, and potential significance of the proposed project. (up to 5 points)

   (4) The extent to which the costs are reasonable in relation to the number of persons to be served and to the anticipated results and benefits. (up to 10 points)

   Strengths:

   3 points. (1) There is a management plan with timelines, goals at each milestone are present, and personnel and their individual roles are defined. The WVDE has already identified the two institutions of higher ed that will launch the higher education portion of the program (p. e41). These are strengths as they have already worked to identify their higher education partners and have worked through identifying the necessary roles and human capital needs. The management plan is comprehensive and shows how the project will develop into a robust program of supporting teachers, parents, and students engaged in remote learning with the goal of sustainability past the life of the grant.

   2 points. (2) Development of the modules will allow for a replicable model and there is a plan for continuous improvement of the modules. Although very general, the use of funds appears to adequately support the proposed project with the exception of tuition allocations. The WVDE will lead teacher educators from 56 West Virginia school districts and professors from our
   two identified flagship universities who will create, develop, implement, take to scale, and replicate the teacher professional learning modules (p. e138). Engaging teachers in projects that directly impact their learning is best research-based practice. Although there is no indication of how teachers involved in the project will be compensated for their involvement, given the amounts budgeted for module development, it is recommended teachers be well compensated for their valuable time and expertise.

   5 points. (3) Classroom teachers along with institutions of higher ed are collaborators in the development of the graduate

modules. Given the objectives, design, and potential significance of the project, the costs appear reasonable (p. e137).

5 points. (4) The reach to parent and students has the potential to be significant and timely. The parent and student modules will be readily available to public school and non-public school families and students in a timely manner (p. e40).

Weaknesses:

(1) The manner by which accredited institutions of higher approve courses, especially graduate level coursework, is generally a long process often taking 3-6 months after the course is developed. The immediate need for educators to be equipped with skills and tools to execute quality remote learning would be hampered by a solely higher education mode of delivery. The grant would have more potential reach and less barriers if it were written in a manner that allowed for more agile ways to provide the module training through high quality professional development for teachers besides graduate coursework.

(2) The budget is very general and there is a lack of explaining how those involved will be compensated. One has to make many assumptions to read into how the general line item budget item will be funded. The line item for tuition support (p. e139) is significantly under the amount of funds that would be necessary to cover tuition for the 20,000 teachers who reported struggling with remote learning instruction (p. e21)

(4) Paying tuition to the scale needed to support the projected number of teachers served by this proposed plan to significantly impact teacher remote instruction effectiveness seems to be under-funded. If teachers or districts are expected to pay tuition, the project will create and access equity barrier.

Reader's Score: 15

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Technical Review Coversheet

Applicant: West Virginia Department of Education (S425B200013)
Reader #2:   **********

		Points Possible	Points Scored
Questions			
Selection Criteria			
Highest Coronavirus Burden			
1. Coronavirus Burden		20	20
Quality of Project Services and Project Plan			
1. Project Services/Plan		35	27
Quality of Management Plan / Adequacy of Resources			
1. Management Plan/Resources		25	17
	Sub Total	80	64
	Total	80	64

Technical Review Form

Panel #10 - FY20 REM - 10: 84.425B

Reader #2: **********

Applicant: West Virginia Department of Education (S425B200013)

Questions

Selection Criteria - Highest Coronavirus Burden

1. **A: Highest Coronavirus Burden (up to 20 Points)**

   (2) The extent to which the applicant has a high coronavirus burden based on indicators and information factors identified by the applicant in response to Application Requirement 3.   (up to 20 points)

   Strengths:

   The applicant stated that the state could face a $500 M budget gap in the fiscal year ending June 30, 2020 according to the state's Revenue Secretary (p. e19). The governor' stay-at-home order led to 100% of students learning remotely. Nearly 25% of whom do not have usable devices and nearly 30% of whom have inadequate internet or no connectivity (p. e18), which limited students' access to online learning opportunity. Students were not well-versed in the procedures for receiving, completing, and returning assignments remotely (p e24). Per a state survey conducted in June 2020, the 56 school districts reported the inequity in education opportunity as evidenced by the range for usable devices is 37.7% to 100% and for a stable internet connection is 10% to 92.4%. In addition, the applicant described that the teachers were susceptible to connectivity issues (p. e 21). Teachers traditionally are not trained in remote teaching. The rapid shift to online learning forced teachers to adjust non-digital approaches to remote learning approaches without proper trainings (p. e24). Older population of teachers reported to choose retirement instead of returning for the 2020-21 out of concern for their own health (p. e21). Parents struggled to receive learning activities and lacked the skills to direct young students' learning and/or support older students.
   The applicant clearly described in detail about the significance of impact of the pandemic on students, teachers, and schools.

   Weaknesses:

   No weaknesses noted.

Reader's Score: 20

Selection Criteria - Quality of Project Services and Project Plan

1. **B: Quality of Project Services and Project Plan (up to 35 points)**

   The Secretary considers the quality of project services and project plan.

   In determining the quality of the project services and project plan, the Secretary considers the quality and sufficiency of strategies for ensuring equal access and treatment for eligible project participants who are members of groups that have traditionally been underrepresented based on race, color, national origin, gender, age, or disability. (up to 5 points)

   In addition, the Secretary considers--

   (1) The extent to which the proposed project is an exceptional approach to absolute priority

being addressed and includes a detailed project plan for addressing the absolute priority. (up to 10 points)

(2) The extent to which specific gaps or weaknesses in services, infrastructure, or opportunities have been identified and will be addressed by the proposed project to respond to the needs of students. (up to 10 points)

(3) The likelihood that the services to be provided by the proposed project will expand access to remote learning options and lead to improvements in student outcomes. (up to 5 points)

(4) The extent to which the services to be provided by the proposed project reflect up-to-date knowledge from research and effective practice. (up to 5 points)

Strengths:

Ensuring equal access and treatment for eligible project participants who are members of groups that have traditionally been underrepresented based on race, color, national origin, gender, age, or disability:
4 points
The applicant demonstrated its commitment to ensure that the proposed project supports all students and parents who are members of groups that have traditionally been underrepresented based on race, color, national origin, gender, age, or disability (p. e10-11). The applicant provided convincing evidence and data to support its claim such as its schools serve a large population of students and parents from low socioeconomic backgrounds; majority of students are English language learners (p. e10).

8 points
1) The applicant identified that teachers were not prepared for the rapid shift of providing online instruction nor the parents and students. Thus, the applicant proposed to build teacher capacity through the state's institution of higher education to better equip current and future K-12 teachers. In addition, the applicant proposed to provide resources to support parents and students with devices and remote learning materials (p. e25). Such approach is directly aligned to the needs identified.

8 points
2) The applicant identified that teachers were not prepared for online teaching, thus the applicant proposed to offer courses and trainings to teachers focusing on remote learning models (p. e28). In addition, the applicant provided plans to support parent and students through online learning modules (p. e30-31). The applicant clearly identified the gaps and weaknesses as mentioned above and proposed an adequate plan to address these specific gaps.

2 points
3) The remote learning model the project proposed offered access to remote learning options. Teachers through trainings and course completion are likely equipped for effective online instruction that would lead to improvement in student outcomes (p. e28).

5 points
4) The extent to which the services to be provided by the proposed project reflect up-to-date knowledge from research and effective practice as evidenced by the contents of the modules such as "Implementing Universal Design for Learning", "Transforming Learning Though Curricular Integration" (p. e30), which is current and impressive.

Weaknesses:

Ensuring equal access and treatment for eligible project participants who are members of groups that have traditionally been underrepresented based on race, color, national origin, gender, age, or disability:
The applicant did not address how the proposed approach of building teacher capacity would ensure equal access for participants who are members of underrepresented groups.

1) Though the applicant addressed to build teacher capacity to be prepared for delivering remote learning instructions to

students but failed to address the challenges of internet connectivity and lack of devices that teachers faced (p.e21). Such needs are essential to access the remote learning modules for teacher capacity increase. The approach is appropriate but not exceptional.

2) Though the applicant expressed the inequity in education as evidenced by the ranges of device usage and stable internet connectivity as a pandemic burden among school districts surveyed, limited to no strategies were proposed to address the concerns. Internet connectivity and devices are essential for students to access the remote learning modules (p. e18).

3) The applicant did not address how to provide teachers and students with devices and overcome the challenges of internet connectivity, which are essential to access the online learning model proposed by the project. The applicant stated that "19 of 55 districts do not have usable digital devices to access instruction" and "29% of students from 21 of 55 school districts do not have acceptable internet" as examples (p. e137); yet the applicant failed to provide details about how the resources under grant funds would be available for equitable distribution to support the proposed project. Without a clear and detailed project plan addressing the root causes, it is in doubt that the likelihood of the services to be provided by the project would lead to improvements in student outcomes in response to all of the stated needs and barriers.

4) No weaknesses noted.

Reader's Score: **27**

Selection Criteria - Quality of Management Plan / Adequacy of Resources

1. **C: Quality of the Management Plan and Adequacy of Resources (up to 25 points)**

   In determining the quality of the management plan and adequacy of resources, the Secretary considers--

   (1) The adequacy of the management plan to achieve the objectives of the proposed project on time and within budget, including clearly defined responsibilities, timelines, and milestones for accomplishing project tasks. (up to 5 points)

   (2) The extent to which the proposed use of funds will adequately support the proposed project. (up to 5 points)

   (3) The extent to which the costs are reasonable in relation to the objectives, design, and potential significance of the proposed project. (up to 5 points)

   (4) The extent to which the costs are reasonable in relation to the number of persons to be served and to the anticipated results and benefits. (up to 10 points)

   Strengths:

   5 points
   1) The applicant proposed six activities with specific outcomes and clearly defined measures as evidenced by Table 7 Outcomes and Measurability (p. e35-37). Clearly defined measures and expected outcomes are essential so that the progress of the project can be monitored and assessed. Roles and responsibilities, timelines, and milestones are clearly identified that are realistic and achievable (pp. e37-40). Clearly defined roles and responsibilities not only can hold involved personnel accountable but also for clarity in task and duty distribution. Personnel resumes were evident demonstrating the strong capacity and abilities of person involved to carry out the project. The management plan is adequate to achieve the desired results.

   5 points
   2) The applicant provided a budget narrative that the proposed use of funds appeared to adequately support the proposed

project as evidenced by itemized budget allocation (p. e139).

5 points
3) The applicant provided a budget narrative that the costs are reasonable in relation to the objectives, design, and potential significance of the proposed project as evidenced by itemized budget allocation. All of the amounts proposed are within the fair range amount and seem necessary (p. e137-139).

2 points
4) The applicant stated the online learning module would be available to all 56 school districts (p. e17), which provided an anticipated impact in relation of persons to be served in a general, broad term.

Weaknesses:

1) No weaknesses noted.

2) No weaknesses noted.

3) No weaknesses noted.

4) The applicant only stated that teachers in 56 districts would be involved and all K-12 students would benefit from the project (p. e17). It is difficult to determine whether the costs are reasonable in relation to the number of persons to be served and to the anticipated results and benefits without specific number identified.

Reader's Score: 17

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Technical Review Coversheet

Applicant: West Virginia Department of Education (S425B200013)

Reader #3: **********

	Points Possible	**Points Scored**
Questions		
Selection Criteria		
Highest Coronavirus Burden		
1. Coronavirus Burden	20	20
Quality of Project Services and Project Plan		
1. Project Services/Plan	35	28
Quality of Management Plan / Adequacy of Resources		
1. Management Plan/Resources	25	15
Sub Total	80	63
Total	80	63

Technical Review Form

Reader #3:   **********

Applicant: West Virginia Department of Education (S425B200013)

Questions

Selection Criteria - Highest Coronavirus Burden

1. **A: Highest Coronavirus Burden (up to 20 Points)**

   (2) The extent to which the applicant has a high coronavirus burden based on indicators and information factors identified by the applicant in response to Application Requirement 3.   (up to 20 points)

   Strengths:

   2.The application addresses a high coronavirus burden and clearly describes information factors as well as measurable and observable indicators of change that are both qualitative (e.g., changes in health, how lives were changed) and quantitative (e.g., 17 percent of West Virginia's student population receives special education); and unemployment rates higher than national averages. The vulnerable health conditions; debilitating scourge of the opioid epidemic; COVID-19 has exacerbated the existing economic, and social numbers. The application stated that 100% of the students learning remotely (nearly 25% of whom do not have usable devices and nearly 30% of whom have inadequate internet or no connectivity) as well as record job losses and increasing hardships. e18

   Weaknesses:

   None noted.

Reader's Score: 20

Selection Criteria - Quality of Project Services and Project Plan

1. **B: Quality of Project Services and Project Plan (up to 35 points)**

   The Secretary considers the quality of project services and project plan.

   In determining the quality of the project services and project plan, the Secretary considers the quality and sufficiency of strategies for ensuring equal access and treatment for eligible project participants who are members of groups that have traditionally been underrepresented based on race, color, national origin, gender, age, or disability. (up to 5 points)

   In addition, the Secretary considers--

   (1) The extent to which the proposed project is an exceptional approach to absolute priority being addressed and includes a detailed project plan for addressing the absolute priority. (up to 10 points)

   (2) The extent to which specific gaps or weaknesses in services, infrastructure, or opportunities have been identified and will be addressed by the proposed project to respond to the needs of students. (up to 10 points)

   (3) The likelihood that the services to be provided by the proposed project will expand access to remote learning options and lead to improvements in student outcomes. (up to 5 points)

(4) The extent to which the services to be provided by the proposed project reflect up-to-date knowledge from research and effective practice. (up to 5 points)

Strengths:

The applicant has clearly identified a plan to provide equal access and treatment for participants. Purposeful outreach efforts to assure that members of all groups are encouraged to participate in the proposed projects are addressed. Strategies will address underrepresented populations consideration, increased access to high-quality remote learning and reasonable and appropriate accommodations to meet the educational needs and evaluation of a diverse population. Likewise, strategies will address appropriate accommodations such as resources/materials in diverse, language, Braille; recordings/videos, in American Sign Language (ASL). This will ensure that those with disabilities, language barriers, etc. have access to program materials. e10

1. The applicant has described exceptional approaches used to address the priorities for this competition. They have noted services such as school counselling and online tutoring which will take place on the WVDE Office 365 platform which was purchased by the WVDE for all schools in the state. Teachers will provide this service to students and parents. For example, Student Remote Learning Coursework for Elective Credit, and Online Tutoring/Help for Parent Support Modules are provided and would demonstrate exceptional approaches to the competition's priorities. e41 139

2. The nature and magnitude of gaps have been clearly identified and objectives and strategies will be addressed by the proposed project to respond to the needs of students. They have noted disparities such as, lack of experience which has created learning barriers for students that many parents may not have the expertise to overcome. The application proposes to provide resources such as, online hotline for remote learning assistance, at-home internet access (i.e., cellular hotspots, satellite access) for students as the WVDE steadfastly works with state government to improve connectivity across the state. Additionally, teachers are not trained in remote teaching. The application proposes to provide 18 hours of graduate-level, module-based coursework and learning certification to teachers; remote learning instruction and practice into proposed pre-service teacher education and teacher induction requirements to respond to the needs of the students. e27

3.None noted.

4. The applicant has clearly addressed how their choice of services reflects up-to-date knowledge. For example, to substantiate their remote learning model, they will utilize research from Hartman, S., Johnson, J., Klein, B., Showalter, D. (2019). Why Rural Matters 2018-2019: The Time Is Now. The Rural School and Community Trust. Research methods emphasize the effects of low levels of achievement resonate throughout the lifespan, often resulting in decrease graduation rates, higher incarceration rates, physical and mental health issues, and an increased likelihood of reliance on public assistance as adults. Research methods emphasize the benefit of technology enhanced learning environment. Likewise, their design meets this criterion since they offer teacher expertise in remote learning, different instructional designs to address diverse learning styles as well as an increase digital resource. e40

Weaknesses:

None noted.

1.The application does not address internet connectivity and device access even though the applicant highlighted this as a challenge. It is unclear how this service will improve remote learning skills. e15

2.The application does not fully address specific gaps and weaknesses by the proposed project. The application highlighted internet connectivity and device access for students/parents as a weakness. It is unclear how this service will improve remote learning skills since it was not fully addressed. e25

3. The applicant does not address the likelihood that services to be provided by the proposed project would expand access to remote learning options or lead to improvements in student outcomes. They did not explain the root causes of the challenges that the applicant highlighted (internet connectivity nor device access). e36

4. None noted.

Reader's Score: 28

Selection Criteria - Quality of Management Plan / Adequacy of Resources

1. C: Quality of the Management Plan and Adequacy of Resources (up to 25 points)

In determining the quality of the management plan and adequacy of resources, the Secretary considers--

(1) The adequacy of the management plan to achieve the objectives of the proposed project on time and within budget, including clearly defined responsibilities, timelines, and milestones for accomplishing project tasks. (up to 5 points)

(2) The extent to which the proposed use of funds will adequately support the proposed project. (up to 5 points)

(3) The extent to which the costs are reasonable in relation to the objectives, design, and potential significance of the proposed project. (up to 5 points)

(4) The extent to which the costs are reasonable in relation to the number of persons to be served and to the anticipated results and benefits. (up to 10 points)

Strengths:

1.The applicant has provided information needed in order to effectively assess the efficiency of their management plan. Details regarding milestones and specific responsibilities on the timeline for actions necessary to carry out and support the implementation and evaluation plan; and strategies to achieve the objectives within budget on time are documented. The applicant clearly documents committed staff responsibilities that are linked to specific times and project milestones. Additionally, the Project Director (Master of Arts in Reading -Bachelor of Science in Elementary Education) has authority to effectively conduct the project, and has appropriate professional qualifications, experience, and administrative skills to effectively fulfill the objectives of the project. Budget and project oversight, accountability and processes, fiscal, personnel components are addressed as well to ensure that the project achieves the proposed objectives. e115 125

2.The application proposes a budget that is sufficient to support the activities of the project. Proposed expenditures are outlined in areas of equipment, contractual. Costs are related to the objectives of the project are clearly demonstrated by the applicant. e6

3.Their budget clearly links the proposed expenditures to the proposed objectives, design, activities and significance of the proposed project. The budget addresses the needs and objectives of the project, and is sufficient to support project activities. A budget narrative is included and shows reasonable costs in relation to services proposed such as contractual and equipment. e6

4. None noted.

Weaknesses:

1. None noted.

2. None noted.

3. None noted.

4.The applicant has not provided clear information regarding how costs are reasonable in relation to the number of persons to be served. They have not provided a clear estimate of the number of people that they plan to provide services to therefore, it is difficult to determine the reasonableness of costs. e40

Reader's Score: 15

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Status: Submitted
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