## Technical Review Coversheet

**Applicant:** Alabama State Department of Education (S425B200032)

### Reader #1

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Panel #1 - FY20 REM - 1: 84.425B

Reader #1: **********
Applicant: Alabama State Department of Education (S425B200032)

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 data to indicate that the state has confirmed a total of 31,000 additional cases in Alabama, resulting with the state having the nation’s second highest per capita number of cases between June 8-June 14. (pg. e18)

Weaknesses:

- There was no discussion by the applicant addressing data on ethnicity/race and impact of the virus on those populations.
- There was no discussion by the applicant addressing data on English versus non-English needs of the state’s student and/or family populations.
- It is not clear from the proposal what the implications and burdens of the virus are on the populations that have been identified.
  - For example, the application does not describe how the virus impacts the rural regions of the state.
  - In addition, the application does not provide information about how the virus impacts those children/families lacking broadband access.
- It was not clear how the state’s children/families with low incomes are impacted by the virus and its subsequent impact on learning.

Reader’s Score: 5

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:

- B0: The application provides a mission statement: “...to mitigate the negative impact of the coronavirus on the academic success of students... with emphasis on traditionally underrepresented students.” Underrepresented students often do not have equal access and a focus on this population enhances the likelihood of a focus on this group. This reflects an emphasis to ensure equal access for children to participate in the project. (pg. e19)
- B0: The project proposes to address the needs of students in public and private schools, children with disabilities and children in high poverty areas. (pg. e20)
  - Children with disabilities present unique challenges and have often been excluded from access to virtual learning platforms. Attention to this element strengthens this application and enhances the quality of the design.
  - Children living in high poverty areas often experience significant challenges accessing virtual learning platforms. The applicant indicates an intent to provide specific attention to the equitable access of this group to virtual learning opportunities.
- B1 and B2: The focus on dual enrollment as an option for secondary students is positive. The proposal mentions this is a strategy to promote post-secondary enrollment. This emphasis reflects both an exceptional approach to this priority and meeting a potential gap in supporting secondary students for later work success. (pg. e21)
  - Research suggests having dual enrollment opportunities enhances the likelihood that students will continue to pursue post-secondary education. Given the applicant’s proposal to reach out to children living with families with low income and those in underrepresented communities, this component is especially important in supporting these two populations that often are not equally represented in post-secondary settings.
- B1 and B2: The applicant addresses designing the registration for program enrollment to allow for multilingual options to support the needs of parents that may be non-English applicants. This element is positive, providing non-English parents opportunities to enroll their children in this effort, reflecting an effort to address what is often a gap in services. This component of the project reflects both an exceptional approach to this priority and a strategy to meet gaps in services for families. (pg. e22)
- B3: The applicant proposes to use such programs as SchoolsPLP and the Florida Virtual Schools platforms to provide software programs to meet the needs of students K-12. The addition of these programs will provide enhanced opportunities for children, especially those in remote learning situations and across grade levels, to access online learning options.
- B4: Several of the strategies the applicant proposes to use, such as dual enrollment and multilingual emphasis, reflect the project’s attention to research and evidenced based practices.
Weaknesses:

- B0: The proposal is weak in addressing how the state will address the needs of some of the targeted populations, specifically race, ethnicity, or age.
  - It is not clear how the applicant will address the full range of grades K-12. The applicant mentions using two providers that have programs that cover the full range of grade levels. However, the applicant does not address attention to grade levels outside of the secondary levels.
- B1: no weaknesses
- B2: The proposal does not provide information about how children/families living in areas with poor connectivity will be provided with hotspots to access online services. Connectivity is identified as a need in the state however it is not clear how the applicant proposes to address this component.
- B3: It is not clear from the data provided exactly how many electronic devices or hotspots will be needed and
  - This proposal does not provide sufficient information in this area to determine if they will be able to expand access to remote learning options.
- B4—no weaknesses

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:

- C1: The applicant proposes to contract with a project management firm to handle key components of the initiative (pg. e23)
  - Effectively and consistently monitoring project activities and attention to accountability processes enhances a project’s likelihood to keep to its intended goals and objectives.
- C1: The timeline established for this initiative appears appropriate for the project plans. (pgs. e24-26)
  - The application addresses engaging families in surveys to determine their satisfaction with the online system. This strategy will assist the project in achieving proposed objectives meeting criteria C1. (pg. e34)
- The applicants set accountability levels for participation and academic performance levels. This strategy will assist the project in achieving proposed objectives meeting criteria C1. (pg. e35)
- C2: The funds the applicant proposes would be adequate to support the proposed project.
C3: The applicant indicates a commitment to a minimum of 80% of grant funds to directly support parent microgrants. This projection reflects a strong position on the reasonableness of costs to the objectives and potential significance of the project.

C4: The projected costs of [redacted] per student would be reasonable to allow the project to meet objectives and potential significance.

Weaknesses:

C1: The proposal did not include a timeline with specific dates (month/year) to establish a set procedural process for such events as the surveys of satisfaction. (pgs. 24-26) Projects lacking specific dates for accountability make it difficult to maintain up to date work scopes and to know if they are keeping on track with projected project activities.

C2: Alabama reports approximately 820,000 students impacted by the virus. The proposal suggests impacting 2,000 students per year and up to 6,000 students over the 3 years of the project. Only identifying 2,000 children per year seems an extremely low number considering the total population of children in the state’s K-12 system. (pg. e27)

A later section on performance measures suggests the state will serve 1,600-2,000 students in a project year. (pg. e33)

Only serving 2,000 students annually reflects that the state is not adequately identifying and recruiting enough numbers of potentially eligible students. This is especially relevant as the applicant indicates they have the fourth highest number of children living in poverty. (pg. e28)

C1: The applicant does not provide sufficient information about the outreach to non-public school students (private and homeschool) and this makes it difficult to determine the adequacy of the state’s outreach.

It is unclear how public-school counselors and social workers will work with non-public school and homeschool families.

The plan suggests an awareness program with non-public school and homeschool families, but the applicant does not indicate the elements of the awareness program and how information will be shared with these families.

C1, C3 and C4: The application speaks to the issue of the lack of connectivity of rural, disadvantaged students. However, the application does not provide sufficient specificity about how internet access will be provided to students. It is also not clear exactly how many students are impacted by low connectivity issues. Subsequently it is not clear if the project costs are reasonable to the objectives set and to the number of persons to be served. (pgs. e32-33)

This reflects a lack of sufficient information to determine the adequacy of the plan to achieve the objectives of the proposed project.

The lack of baseline data on the number of students impacted by connectivity issues and no available targets for this element demonstrates a lack of adequate milestones to determine project growth.

C3: It is unclear how many areas or districts and families (respectively) are impacted by lack of devices and/or low connectivity. The project suggests a figure of 16.5 percent of households lack access to broadband services. Given this could be a large number of students/families, it seems important to know more specifically the numbers reflected by this data as this will have a significant impact on whether the project is able to achieve its objectives. Therefore, it is not possible to determine if the project costs are reasonable to the objectives set.

C3: The application indicates a cost for services per child to range from [redacted] annually. With such a broad range of cost estimates, it is difficult to determine the reasonableness of costs for this project. (pg. e50)
## Technical Review Coversheet

**Applicant:** Alabama State Department of Education (S425B200032)

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

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Panel #1 - FY20 REM - 1: 84.425B

Reader #2: **********
Applicant: Alabama State Department of Education (S425B200032)

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:

• Page 18- In addition to coronavirus burden factors that are considered in A1, the applicant presents additional data reflecting 900 confirmed coronavirus-related death cases at the date of application. This indicates a moderate amount of coronavirus burden.

Weaknesses:

• Pages 18-19 – The application lacks any additional relevant data or factors other than death cases mentioned above.

Reader’s Score: 5

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:

- For criterion B0 - The applicant provides a convincing statement ensuring equal access and treatment for different groups; their plan is to target all students in poverty and students with disabilities:
  - Page 10 – Eligibility will be determined using national school lunch program information, school enrollment, and other resources available to each household.
  - Page 22 – The program provides two convenient ways for parents to apply through an online portal or traditional paper application which supports equal access.
  - Page 22 - The system includes multilingual options to support the parents of ELL students.
- For criterion B1 - The proposed program demonstrates an exceptional approach since:
  - Pages 20, 21 – it not only intends to increase the broadband access but also provides additional support to students with special needs, and promotes dual enrollment for disadvantaged students.
  - Page 20 – the application offers a comprehensive program that targets all disadvantaged students enrolled in public, private, and homeschool.
  - Page 22 – the program allows parents to provide feedback, make requests, and ask questions via software which is an integral part of successful planning and implementation.
- For criterion B2 - The applicant has an effective plan in identifying and addressing the gaps, weaknesses, and opportunities:
  - Page 20 – The applicant describes that over sixteen percent of the population, especially students who live in rural areas, lacks broadband access. Therefore, the applicant indicates that they will provide internet access or hotspots to approximately 2,000 K-12 student households each year.
  - Page 20 – The applicant proposes online live support to special needs students such as speech-language therapy, occupational therapy, behavioral intervention and mental health services.
  - Page 21 – The program promotes dual enrollment opportunities especially for disadvantaged students and students in failing schools.
  - Page 22 – As an infrastructure, the applicant plans to invest in creating a software as a service provider which will enhance the planning and implementation of the program.
- For criterion B3 - The application demonstrates a high-quality plan that:
  - Page 27 - expands access to 6,000 students in three years, provides broadband access and online special needs services, and increases dual enrollment during the pandemic.
  - Page 28 – provides the list of qualified service providers for internet access and hot spots, special needs services, and dual enrollment options, and parents will also be able to suggest additional providers.
  - Pages 33, 34 – targets a high level of parent satisfaction with an adequate percentage (90%) of parent surveys completed each year.
  - Page 34 – focuses on improving the completion rate of courses attempted by students served by 10% in year 2 and 3.
  - Page 35 – has a very ambitious target in academic achievement by promising the equivalent level of the baseline academic data from the prior academic year.
- For criterion B4 – Page 21- The applicant referenced a study only once which is from Community College Research Center at Columbia University’s Teachers College and the National Student Clearinghouse research center while explaining the importance of dual enrollment for post-secondary success.

Weaknesses:

- For criterion B0:
  - Page 10 - The applicant describes the English Language Learner population as a disadvantaged group during the application process and mentions that the project will work with Alabama Reading Initiative specialists. However, there is no evidence about this partnership throughout the application.
  - Page 17 – The applicant presents that priority will be given to the most disadvantaged students and students attending failing schools. However, there is inadequate data shared about the number of failing schools or the number of students who are considered the most disadvantaged.
- For criterion B1;
  - Pages 18, 20, 21 – The application lacks data about students who have special needs, students who are already benefiting from dual enrollments, and students who could benefit from this grant program’s dual enrollment option. As a
result, it is unclear how effective the proposed program would be.

- For criterion B2:
  - Page 24 – Because the project plan is not sufficiently detailed, it is difficult to determine whether the proposed project will address all the needs specified.
  - Page 29 – The application states 30 days for a written response time for parents’ requests. This is an extremely long delay and the applicant does not provide a justification for why such a long delay would be needed.
- For criterion B3: no weaknesses.
- For criterion B4:
  - Page 21 - The applicant fails to show that the proposed project meets this criterion as there is an inadequate amount of citations and references to research and effective practices. The applicant referenced only one example on page 21 when describing the importance of dual enrollment.

Reader’s Score: 26

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:

- For criterion C1:
  - Pages 23-26 – The management plan with proposed timelines, defined duties, and a dedicated project director and project management firm is comprehensive and adequate.
- For criterion C2 – The proposed use of funds will provide adequate support to run the program effectively.
  - Pages 26, 27 – The application indicates that 80% of the funds will be dedicated to microgrants, [redacted] will be used to pay for the project director and project management, and [redacted] will be used for indirect costs.
- For criterion C3:
  - Page 27 – The costs budgeted for the program seem reasonable since 80% of the funds will go directly toward microgrants and other than the administrative costs, the second biggest cost is for the custom software.
- For criterion C4:
  - Page 27 – The program anticipates reaching 6,000 students in three years and will provide microgrants ranging from [redacted] per household, which seems reasonable to provide additional support for receiving remote learning opportunities.

Weaknesses:

- For criterion C1—no weaknesses.
- For criterion C2—no weaknesses.
For criterion C3 – The application reflects some inconsistencies, discrepancies, and unclear information:

- Page 26 – Spending $1.5 million for software development sounds unreasonable when you consider it as a month-long project as defined in the timeline.
- Page 30 – The budgeted amount of [redacted] for microgrants every year is unclear. The application states that microgrants are estimated to range from $600-$2,500 per household per year which means the total cost may vary from [redacted] to [redacted] for 2,000 households.

For criterion C4 - Based on the application and provided details, the number of students to be served and anticipated results are insufficient and not reasonable.

- Page 30 – There is no clarity on the estimated number of students receiving broadband access, or special education services, or dual enrollment support.
- Page 28 - The applicant fails to show measurable expected outcomes and benefits other than stating that the program will provide a high-quality remote learning program.

*- Flagging for ED office - Page 26 – The administrative costs including the cost for the director and project management firm exceeds the recommended 5% which is prescribed in the application package.
* - Flagging for ED office - Page 48-49 – There is a $25,000 typographical error in the calculation of the first-year cost for contractual expenses. The contractual expenses add up to [redacted] but are listed as [redacted].

Reader's Score: 17

Status: Submitted
Last Updated: 07/22/2020 09:45 AM
### Technical Review Coversheet

**Applicant:** Alabama State Department of Education (S425B200032)  
**Reader #3:** **********

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Panel #1 - FY20 REM - 1: 84.425B

Reader #3: **********
Applicant: Alabama State Department of Education (S425B200032)

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 application uses number of confirmed cases and deaths to demonstrate the State’s Coronavirus burden (page 18). These data provide some evidence that the state has been significantly impacted by the COVID-19. (A-2)

   Weaknesses:
   The indicators and information factors provided in the first three paragraphs of page 18 are only repetition of the data in the coronavirus burden table in the application package (percentage of population without broadband access, percentage of ages 5-17 in poverty, state percentage share of confirmed cases, covid-19 cases per capita, percentage of students in rural local educational agencies). As a result, the application does not provide sufficient evidence that the state has a high coronavirus burden based on indicators and information factors identified by the applicant in response to Application Requirement 3. (A-2)

Reader’s Score: 5

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:

1. The proposed project plan includes strategies to use outreach to ensure that the target population receives notification of the available opportunity and provide multilingual options for the applications (both paper and online). These strategies are of high quality to ensure 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. (B-0)

2. The proposed project addresses the absolute priority one by providing internet access or hotspots, online or other special education services, and dual enrollment opportunities to the most disadvantaged students (pages 20-21). These objectives described in the application align well with the absolute priority one. As a result, the proposed project is a feasible approach to address the absolute priority. (B-1)

3. The application identifies the gap as "lack of quality and cost-effective internet services and hardware", and the proposed program plans to bridge the gap by providing internet access or hotspots, online or other special education services, and dual enrollment opportunities to the most disadvantaged students. As a result, the application provides some evidence that specific gaps or weaknesses in services, infrastructure, or opportunities have been identified. (B-2)

4. The proposed program targets disadvantaged students, including students enrolled in failing schools, students with special needs, and students living in high poverty, and provides them access to remote learning resources, including the Alabama State Department of Education (ALSDE) Virtual School, dual enrollment with Alabama institutions of higher education, and special education services. This proposed approach is likely to expand the targeted student population’s access to remote learning options. (B-3)

5. The application uses one piece of research to justify the inclusion of dual enrollment opportunities in the project (i.e., the citation of a research report by Clearinghouse Research Center on page 21). As a result, the application provides some evidence that the services to be provided by the proposed project reflect up-to-date knowledge from research and effective practice. (B-4)

Weaknesses:

1. Although the application briefly describes an approach to addressing absolute priority one, the project plan does not include sufficient detail about how to achieve the objectives of the project so that the absolute priority one will be fully addressed. For instance, although the application states that "tools to help parents select services will be available in the online portal and paper application" (page 28), it does not describe what tools will be provided to help parents choose the most appropriate and effective services for their children. It also does not describe how to make sure the list of services providers in the system are of high-quality and the process to include the additional providers suggested by parents. (B-1)

2. Although the project intends to target the most disadvantaged student population in the state, it does not provide data about the characteristics of this particular group, such as their academic performance, the number or percentage in the group, and the racial and geographic distributions of this particular student population. Without identifying these characteristics of the most disadvantaged students, it is unclear how the project can address the identified gaps and be responsive to the needs of the students. (B-2)

3. The application does not provide sufficient evidence that the services to be provided by the proposed project reflect up-to-date knowledge from research and effective practice. For instance, there is only one citation of research work in the entire application document (i.e. the citation of a research report by Clearinghouse Research Center on page 21). (B-4)

Reader’s Score: 24
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 application outlines a brief management plan that includes major activities, milestones, responsible party, and timeline of the project, all of which seem to be moderately adequate. As a result, the management plan is moderately adequate to achieve the objectives of the proposed project on time and within budget. (C-1)

2. The program will use 10% of the funds for platform development and of the funds for the project director and project management company. This meets the program requirement that 80% of the funds will go directly toward microgrants. The project plans to hire a project director and a project management company that will be dedicated to the project. This provides some evidence that the proposed use of funds will adequately support the proposed project. (C-2)

3. The project asks for It intends to target the most disadvantaged student population in the state by providing internet access or hotspots, online or other special education services, and dual enrollment opportunities. Given the types of services it provides and the targeted student population, the requested amount of funds is very reasonable in relation to the objectives, design, and potential significance of the proposed project. (C-3)

4. The proposed project is projected to serve 2,000-6,000 students. This amounts to per student. The funds can be used to purchase one of the three remote learning services (internet access and hotspots, access to special needs services, or dual enrollment). The anticipated results of the project are measured by completion rate of courses attempted by students served, and improved academic achievement through the remote learning offered to students via microgrants. Given the number of students the project serves, the project is moderately reasonable in relation to the number of persons to be served and to the anticipated results and benefits. (C-4)

Weaknesses:

1. Many parts of the project management plan do not include sufficient detail. For instance, the timeline for surveying parents is unclear, and the plan to collect performance data is also vague. As a result, it unclear whether the management plan includes adequate detail to achieve the objectives of the proposed project on time. (C-1)

2. The application does not provide an estimation of what percentage of the funds will be spent on device and internet access and what percentage of the funds will be spent on educational services. This raises the question of whether 80% of the funds will be used adequately to achieve all the three objectives. As a result, it is unclear whether the proposed use of funds will adequately support the proposed project. (C-2)

3. The proposed project is projected to serve 2,000-6,000 students (using the numbers on page 28). At the upper end of this range, that amounts to per student. Given that over 820,000 Alabama students have been impacted and 16.5% of the population does not have internet access, the application does not provide adequate justification for why the costs are reasonable in relation to the number of persons to be served. (C-4)