Georgia’s State ARP ESSER Plan: Accelerating Learning, Personalizing Supports, and Promoting Opportunity

Richard Woods, State School Superintendent
**Grantee and Contact Information**

ARP ESSER PR Award Number: S425U210012  
SEA Contact: Matt Cardoza  
Telephone: 404-550-7298  
Email address: mcardoza@doe.k12.ga.us

| By signing this document, I agree to each of the assurances listed in Appendix C and further assure that:  
To the best of my knowledge and belief, all information and data included in this plan are true and correct. |
|--------------------------------------------------|
| Chief State School Officer or Authorized Representative (Printed Name)  
Richard Woods |
| Signature of Authorized SEA Representative  
[Signature] |
| Date:  
June 7, 2021 |
A. Describing the State’s Current Status and Needs

The Department recognizes the extraordinary efforts made by States, LEAs, and educators to support students during the COVID-19 pandemic. In this section, SEAs will describe the progress they have made, the priorities and student needs guiding their ARP ESSER funding decisions, and their current and projected operating status.

1. Progress and Promising Practices: Provide your assessment of the top 2-3 strategies that have been most effective in supporting the needs of students in your State during the COVID-19 pandemic, especially for students most impacted by the COVID-19 pandemic. Please include, if applicable, how your State will submit and encourage its LEAs to submit lessons learned and best practices to the Department’s Safer Schools and Campuses Best Practices Clearinghouse so that they can be shared with other States and LEAs.

Focusing on Compassion Over Compliance

From the onset of the pandemic, State School Superintendent Richard Woods set the tone of focusing on "compassion over compliance" in the agency’s approach to the COVID-19 pandemic. This child-focused, classroom-centered approach sought to transform traditional education systems, programs, and structures in order to meet the challenges of the moment. Under the leadership of Superintendent Woods, the Georgia Department of Education (GaDOE) focused on three core strategies during the pandemic: (1) ensuring the safety and wellbeing of students and educators, (2) preserving and expanding access (i.e., devices, broadband, school meals, etc.), and (3) supporting innovative instructional practices (i.e., in-person, virtual, or hybrid learning).

Reimagining K-12 Education

Emerging out of the pandemic, Superintendent Woods released A Roadmap to Reimagining K-12 Education. This document lays out a positive vision for education in our state, outlining our goals for the years and months ahead. We will work to ensure access to a well-rounded education for every child, create multiple diploma pathways, continue the reduction of high-stakes testing, develop an accountability system that lifts up -- rather than labels -- our schools, modernize the state’s K-12 funding formula, establish a “21st Century Standard of Learning” for bandwidth, devices, training, and outfitting classrooms, and much more.
Sharing Best Practices

Working with partners, GaDOE will identify lessons learned and best practices from districts and schools across the state. These innovative practices will be shared out and curated via agency communications, conferences, and panel discussions, as well as submitted to USED’s Clearinghouse to spotlight Georgia’s efforts and maximize dissemination and adoption.

2. **Overall Priorities:** Provide your assessment of the top 2-3 issues currently facing students and schools across your State as a result of or in response to the COVID-19 pandemic including, to the extent possible, data illustrating why these are the most critical and/or most widespread issues facing schools and students.

**Hearing from those on the Frontlines During the Pandemic**

Though we are just closing out the school year in Georgia, *State School Superintendent Richard Woods has been in schools and classrooms* since the beginning of the 2020-2021 school year, hearing firsthand from students, school leaders, and educators. In those deep discussions with education stakeholders, GaDOE has identified three top issues facing students and schools across our state:

1. Accelerate Learning
2. Personalize Supports
3. Promote Opportunity

Millions of meals have been prepared and delivered. Millions of lessons have been taught virtually. Millions of phone calls, texts, and FaceTimes have occurred. Millions of extra hours have been logged, and millions of small gestures of dedication, sacrifice, and compassion continue to add up to show the best of who we are as Georgians.

Common themes of issues facing students and schools that arose during the review of the stakeholder input submitted to ARP_ESSER@doe.k12.ga.us included mental health; literacy; interpretation and language support; shortfall of resources; delayed development; internet access in rural communities; transportation; childcare; and adaptability. We continue to seek out opportunities to tackle these shared challenges with SEA and LEA ARP ESSER funding.
3. **Identifying Needs of Underserved Students**: Describe your State’s 2-3 highest priority academic, social, emotional, and/or mental health needs for the remainder of the 2020-2021 school year (if applicable) and for the 2021-2022 school year related to the impact of the COVID-19 pandemic on each of the following student groups:

i. Students from low-income families,

ii. Students from each racial or ethnic group (e.g., identifying disparities and focusing on underserved student groups by race or ethnicity),

iii. Gender (e.g., identifying disparities and focusing on underserved student groups by gender),

iv. English learners,

v. Children with disabilities (including infants, toddlers, children, and youth with disabilities eligible under the Individuals with Disabilities Education Act (“IDEA”)),

vi. Students experiencing homelessness,

vii. Children and youth in foster care,

viii. Migratory students, and

ix. Other groups disproportionately impacted by the pandemic that have been identified by the SEA (e.g., youth involved in the criminal justice system, students who have missed the most in-person instruction during the 2019-2020 and 2020-2021 school years, students who did not consistently participate in remote instruction when offered during school building closures, and LGBTQ+ students).

**Serving the Needs of All Students**

For the 2021-2022 school year, GaDOE’s three major priorities to support all student groups are:

1. **Accelerate Learning**: Identifying unfinished learning and barriers to learning;
2. **Personalize Supports**: Personalizing supports for students and educators, and districts;
3. **Promote Opportunity**: Preserving and promoting access to opportunities.

GaDOE is committed to increasing academic outcomes and removing the non-academic barriers to learning for all students in Georgia. Per federal law, GaDOE makes available subgroup-level academic and accountability data for all districts and schools and provides improvement plan processes and templates for districts and schools to identify and close gaps. Locally, districts and schools administer a variety of formative assessments and screeners to provide more real-time information to address the academic needs of all students. Tools like the Georgia Student Health Survey provide districts and schools with a way to identify non-academic barriers to learning.

GaDOE’s Federal Programs team closely coordinates the activities and efforts of our agency’s numerous federal programs in unison with our School Improvement and Teaching and Learning teams. Georgia has received national recognition for its work with the consolidation of funds that forms the foundation of a
student-focused, improvement approach to empowering school districts and leveraging local, state, and federal dollars to increase student achievement.

In addition to increased academic outcomes, our agency has focused on increasing opportunities by expanding CTAE, fine arts, world language, dual enrollment, gifted, AP, IB, health and physical education, STEM/STEAM, computer science, work-based learning/apprenticeships, and industry credentials/certified programs across the state, particularly in rural areas.

A one-size-fits-all approach doesn’t effectively support our districts, schools, students, or educators. GaDOE’s efforts must continue to meet them where they are by uniquely responding to regional, district, school, and classroom needs. Each and every child has unique unfinished learning and has experienced different learning models throughout the pandemic. Each and every educator needs unique professional learning to support their content areas and academic disciplines, as well as training to support 21st Century learning and instruction.

GaDOE plans to utilize ARP funds for a robust professional learning platform that can be utilized by districts and schools across the state to deliver quality, on-demand professional learning to all educators and support staff. In addition to providing personalized supports, we will create online Professional Learning Communities (PLCs) supporting content areas and courses, facilitated by virtual specialists who are experienced Georgia classroom teachers, and providing an online space for educators to collaborate, ask questions, share resources, and network with peers across the state.

4. **Understanding the Impact of the COVID-19 Pandemic:** Describe how the SEA will support its LEAs in identifying the extent of the impact of the COVID-19 pandemic on student learning and student well-being, including identifying the groups of students most impacted by the pandemic. Where possible, please identify the data sources the SEA will suggest its LEAs use in thoughtfully diagnosing areas of need, including data on the academic, social, emotional, and mental health impacts of lost instructional time.

**Leveraging Formative Tools**

Since the start of the 2020-2021 school year, GaDOE has provided – and will continue to provide – various formative assessment tools and professional learning in formative instructional practices at no charge to all districts in our state. A survey of districts showed that nearly all of them planned to utilize formative assessments, whether those are provided by the state or purchased locally, to identify learning gaps and opportunities to accelerate learning. In addition to the Georgia Student Health Survey that captures discipline, school climate, and absenteeism, districts may select additional tools to identify non-academic barriers to learning.

As part of its federal waiver, GaDOE has agreed to report all traditional and additional data elements required by USED in a publicly available data dashboard for community and school leaders to utilize to identify and address achievement gaps.

All Georgia school districts should consult with and ensure buy-in from community members in an open and transparent manner when making decisions to adopt and implement any assessment tools or programs.
Providing State- and Regional-Level Academic Recovery Specialists

GaDOE’s School Improvement team is working with all federally identified schools to ensure formative data is a cornerstone of their improvement plans and goals. As part of GaDOE’s LEA ARP ESSER Plan application, districts are asked to submit their formative assessment plans as well as which students to target for intensive academic supports. We plan to aggregate the data and feedback from these plans to serve as a needs assessment for our own agency’s efforts during the 2021-2022 school year.

ARP funds will be utilized by GaDOE to fund Academic Recovery Specialists at the state level as part of the agency’s School Improvement team at a regional level in each of the state’s 16 Regional Education Service Agencies (RESAs) to provide additional expertise and respond to the on-the-ground needs of districts and schools.

5. **School Operating Status:** It is essential to have data on how students are learning in order to support the goals of access and equity, especially for student groups that have been disproportionately impacted by the COVID-19 pandemic. Describe the current status of data collection on operational status and mode of instruction of all schools in your State. This description must include:

   i. A description of to what extent, and how frequently, the State collects now and will collect in the future data for all schools in your State on:

   a. Mode of instruction: The number of schools in your State that are offering fully remote or online-only instruction; both remote/online and in-person instruction (hybrid model); and/or full-time in-person instruction;

   b. Enrollment: Student enrollment for all students and disaggregated for each of the student groups described in A.3.i-viii for each mode of instruction; and

   c. Attendance: Student attendance for all students and disaggregated for each of the student groups described in A.3.i-viii for each mode of instruction.

   ii. The data described in A.5.i.a and b. using the template in Appendix A (and to the extent available, the data described in A.5.i.c.) for the most recent time period available. Please note that this data can be submitted separately within 14 calendar days after a State submits this plan. The SEA must also make this data publicly available on its website as soon as possible but no later than June 21, 2021, and regularly provide updated available information on its website. The Department will periodically review data listed in A.5.i on SEA websites.

   iii. To the extent available, a description of the planned operational status and mode of instruction for the State and its LEAs for Summer 2021 and for the 2021-2022 school year.

GaDOE is still in the process of collecting data for section A.5.i.a and will submit this data as permitted by the application’s instructions separately within 14 calendar days. The results will be posted online as permitted and required by June 21, 2021, at https://www.georgiainsights.com/cares-act.html.
Returning to In-person Instruction

Given increased availability of effective vaccines and decreased COVID-19 case counts, Georgia is planning a full return to in-person instruction for the 2021-2022 school year. Georgia is a local control state with ultimate reopening and operational authority given to elected local boards of education, but districts continue to signal their desire and commitment to full in-person instruction for the upcoming school year.

B. Safely Reopening Schools and Sustaining their Safe Operations

The Department recognizes that safely reopening schools and sustaining their safe operations to maximize in-person instruction is essential for student learning and student well-being, and especially for being able to address the educational inequities that have been worsened by the COVID-19 pandemic. In this section, SEAs will describe how they will support their LEAs in this vital area.

1. **Support for LEAs**: Describe how the SEA will support its LEAs in safely returning to in-person instruction and sustaining the safe operation of schools. This description must include:

   i. How the SEA will support its LEAs implementing, to the greatest extent practicable, prevention and mitigation policies in line with the most up-to-date guidance from the Centers for Disease Control and Prevention (“CDC”) for the reopening and operation of school facilities to effectively maintain the health and safety of students, educators, and other staff;

   ii. Any Statewide plans, policies, estimated timelines, and specific milestones related to reopening and operation of school facilities, including any mechanisms the SEA will use to track, monitor, or enforce their implementation;

   iii. To what extent the SEA and its LEAs consult with Federal, State, and local health officials. This description should include, if available, whether the SEA and its LEAs have received support for screening testing from their State or local health department based on funding awarded by the CDC; and

   iv. Any guidance, professional learning, and technical assistance opportunities the SEA will make available to its LEAs.

Georgia’s K-12 Restart & Recovery Working Groups

In May 2020, Governor Brian Kemp and State School Superintendent Richard Woods announced the creation of six K-12 Restart Working Groups to address the impact of the COVID-19 pandemic on Georgia’s K-12 schools and plan for a safe 2020-21 school year.

These working groups assisted in planning the next steps forward and provided guidelines and supports that helped a majority of Georgia’s school districts open for face-to-face learning Fall 2020.

The working groups, which included teachers, school district staff, and public health officials along with representatives of education organizations, nonprofits, and state agencies, focused on six key topics:
school meals; distance learning and professional learning; connectivity and devices; mental health and wellness; supplemental learning; and facilities, equipment, and health guidelines.

**Coordinating with Department of Health and Emergency Management**

In partnership with the Georgia Department of Public Health (DPH), the Georgia Department of Education has provided timely and accurate prevention and mitigation practices to school districts.

At the beginning of the 2020-2021 school year, State School Superintendent Richard Woods established a K-12 Public Health Liaison to coordinate efforts with school districts, DPH, and the Georgia Emergency Management Agency (GEMA). GaDOE’s Public Health Liaison consults with state health officials on a weekly basis. The Georgia Department of Public Health sends a weekly report to the Georgia Department of Education that includes information reported by LEAs weekly, such as instructional models and health related data to track any new cases relating to the prevention and mitigation of COVID-19.
Returning to In-person Instruction

As mentioned in the previous section regarding School Operating Status, given the increased availability of effective vaccines and decreased COVID-19 case counts, Georgia is planning a full return to in-person instruction for the 2021-2022 school year. Georgia is a local control state with ultimate reopening and operational authority given to elected local boards of education, but districts continue to signal their desire and commitment to full in-person instruction for the upcoming school year.

As applicable, additional guidance from DPH, equipment and supplies from GEMA, and support from GaDOE will be provided to districts and schools.

Providing Professional Learning for the Upcoming School Year

GaDOE is organizing The Reimagining Education Conference, an intensive, highly collaborative conference with resources and best practices provided from teams across the agency, as well as state and district partners. Additionally, the work of successful practitioners from across the state will be highlighted to promote possible collaboration efforts amongst districts, best practices, and innovative approaches to learning that may be replicated across the state. As additional needs emerge throughout the 2021-2022 school year, GaDOE will continue to provide responsive, on-demand professional learning and technical assistance to districts and schools.

2. Safe Return to In-Person Instruction and Continuity of Services Plans: Describe how the SEA will ensure that its LEAs that receive ARP ESSER funds meet the requirements in section 2001(j) of the ARP Act and the requirements relating to the ARP ESSER funds published in the Federal Register and available at https://oese.ed.gov/offices/american-rescue-plan/american-rescue-plan-elementary-and-secondary-school-emergency-relief/ (ARP ESSER requirements) to either: (a) within 30 days of receipt of the funds, develop and make publicly available on the LEA’s website a plan for the safe return to in-person instruction and continuity of services, or (b) have developed and made publicly available on the
LEA’s website such a plan that meets statutory requirements before the enactment of the ARP Act, including:

i. How the SEA will ensure that each LEA plan includes, or will be modified to include, the extent to which it has adopted policies and a description of any such policies on each of the strategies listed in table B1;

ii. How the SEA will ensure that each LEA plan describes how it will ensure continuity of services including but not limited to services to address the students’ academic needs, and students’ and staff social, emotional, mental health, and other needs, which may include student health and food services;

iii. How the SEA will ensure that the LEA periodically reviews, no less frequently than every six months for the duration of the ARP ESSER grant period (i.e., through September 30, 2023), and revises as appropriate, its plan, and how the SEA will ensure that the LEA seeks public input, and takes such input into account on (1) whether revisions are necessary and, if so, (2) the revisions to the plan; and

iv. Describe, to the extent the SEA collects it, information about LEA implementation, to the greatest extent practicable, of each element of the most up-to-date CDC guidance listed in table B1 and its LEAs’ needs for support and technical assistance to implement strategies consistent, to the greatest extent practicable, with relevant CDC guidance.

GaDOE provided a streamlined LEA ARP ESSER Plan application to include selections that required the digital signature for the specified LEA personnel’s understanding that in accepting ARP ESSER funds, the LEA would adhere to the requirements in section 2001(i) of the ARP Act and the requirements relating to the ARP ESSER funds published in the Federal Register.

LEAs participated in a statewide webinar training on the new interim final rule requirements pertaining to the ARP ESSER funds. The descriptive webinar expressed the importance to each LEA that the completion of the LEA ARP ESSER application provides the LEA the opportunity to insert the specific link where the LEA’s Return to In-Person Instruction Plan may be located publicly on the district’s website.

The LEA also submits the date that initiates the six-month timeframe in which the LEA will address each of the required aspects of safety established in the interim final rule requirement, as part of the required periodic review if necessary. GaDOE has established a Return to In-Person Instruction Plan calendar to monitor the submissions of LEA plans to implement prevention and mitigation strategies.

GaDOE’s LEA ARP ESSER Plan application requests information from the LEA to (1) estimate the approximate percentage of the LEA’s ESSER III formula funds that will be allocated to implement prevention and mitigation strategies; (2) explain how the LEA engaged the entire school community to establish a safe environment for all educators, school staff, and students in order to promote trust and confidence; and (3) explain how the LEA monitored cases and made decisions about in-person instruction.

Once LEAs submit their initial application with their original ARP ESSER budgets for approval, the agency has a means of monitoring the stages of revisions for LEAs to align their plans with the most up to date guidance from the Centers for Disease Control and Prevention, provided through the Georgia
C. Planning for the Use and Coordination of ARP ESSER Funds

The Department recognizes that seeking input from diverse stakeholders is essential to developing plans for the use of ARP ESSER funds that are responsive to the needs of students, families, and educators. In this section, SEAs will describe their plans for consultation and for coordinating the use of ARP ESSER funds with other resources to meet the needs of students.

1. **SEA Consultation:** Consistent with the ARP ESSER requirements, describe how the SEA engaged in meaningful consultation with stakeholders, and incorporated input into its plan, including, but not limited to:

   i. students;
   ii. families;
   iii. Tribes (if applicable);
   iv. civil rights organizations (including disability rights organizations);
   v. school and district administrators (including special education administrators);
   vi. superintendents;
   vii. charter school leaders (if applicable);
   viii. teachers, principals, school leaders, other educators, school staff, and their unions; and
   ix. stakeholders representing the interests of children with disabilities, English learners, children experiencing homelessness, children and youth in foster care, migratory students, children who are incarcerated, and other underserved students.

The description must include how the SEA provided the public the opportunity to provide input in the development of the plan, a summary of the input (including any letters of support), and how the SEA took such input into account.

Despite the tight timeframe, GaDOE was committed to an open process for Georgians to provide input with the state’s ARP ESSER plan.

On May 5, 2021, GaDOE’s press release went out to more than 127,868 recipients regarding the agency’s interest in receiving input on the development of the ARP ESSER plan in order to provide transparency, accountability, and ensure effective use of the funding. Based on the feedback received through the ARP_ESSER@doe.k12.ga.us email address, Georgians shared their insights and experiences during the pandemic as students, parents, and educational advocates.
The process to receive feedback from stakeholders was intentional. As a result, recipients were given three considerations to ensure clarity and focus to generate their responses to include:

- **Provide your assessment of the top 2-3 issues currently facing students, schools, or subgroups of students as a result of, or in response to, the COVID-19 pandemic.**
- **What strategies, actions, or promising practices has your school, district, or organization observed to be most effective in supporting student needs in response to the COVID-19 pandemic?**
- **How can GaDOE better support students, families, and schools for the safe return to in-person instruction and continuity of services?**

An overwhelming number of submissions thanked the agency for offering the opportunity to provide feedback and provided specific input that was taken into consideration and included into the creation of this plan.

From the public input period, the following major themes emerged:

- **Provide Whole Child Supports for students, especially low-income students**
- **Provide Accelerated Learning Opportunities for students in school and out of school**
- **Provide access to technology, especially for low-income students and students in rural locations**

GaDOE received input and letters from a wide variety of education advocacy groups and community groups representing educators, school leaders, school boards, and over fifteen state organizations (emails and letters can be supplied as needed).

Several virtual meetings were held with state advisory councils, including the Parent Advisory Council, State Advisory Council for Special Education, and McKinney-Vento Advisory Council, that support the interests of specific student populations.

During these meaningful consultations, attendees were provided an overview of Georgia’s ARP funding breakdown to ensure participants had a clear understanding of the funding received and the specific percentages allocated to the local educational agencies, which includes the requirement to address unfinished learning for students.

Additionally, participants were provided the opportunity to participate in active polls and they learned about the agency’s top three priorities to build trust to fully return to in-person instruction.

2. **Coordinating Funds:** Describe to what extent the SEA has and will coordinate Federal COVID-19 pandemic funding and other Federal funding. This description must include:

   i. How the SEA and its LEAs 1) are using or have used prior to the submission of this plan and 2) plan to use following submission of this plan, Federal COVID-19 funding under the Coronavirus Aid, Relief, and Economic Security (“CARES”) Act and the CRRSA Act to support a safe return to and safely maximize in-person instruction, sustain these operations safely, and address the disproportionate impact of the COVID-19 pandemic on individual student groups (including students from low-income families, children with disabilities, English learners, racial or ethnic minorities, students experiencing homelessness, children and youth in foster care, and migratory students);
ii. To what extent ESSER I and ESSER II funds have been awarded to LEAs and, if funds have not yet been made available to LEAs, when they will be. In addition, please provide any available information on the total dollar amounts of ESSER I and ESSER II funds that have been obligated but not expended by the SEA and its LEAs, including whether the SEA is able to track LEA obligations.

GaDOE has awarded all LEAs the available funds for the CARES Act, CRSSA, and ARP. There have been multiple grants provided that supported local educational agencies (LEAs) and state activities through the CARES Act. 100% of CARES Act funding has been obligated and the agency is in the production stages of setting up a dashboard that demonstrates the function and object codes utilized by LEAs for their CARES Act funds. The breakdown below provides a brief narrative regarding the intent of each grant allocated from the CARES Act. Each grant had an explicit purpose to support LEAs with the impact of COVID-19:

### Planning for the Use and Coordination of ARP ESSER Funds

#### ESSER I: Formula and State Reserve Grants

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### CARES Act-ESSER Funds-Formula

- Supported LEAs to offset expenditures related to the impact of the COVID-19 pandemic and support with maintaining safety procedures for students who selected options to participate in full-time instruction.

### CARES Act-ESSER Funds-CTAE-Agriculture

- The State made a reduction to the funding for our CTAE and Agriculture programs. At the recommendation of State School Superintendent Richard Woods, the State Board of Education allocated ESSER-CARES Act funds to make up the difference between the programs’ funding needs and what the General Assembly appropriated for the programs.
CARES Act - ESSER Funds - SEA Reserve Grant Set-Aside-Equitable Services

- Additional grant funds added for the purpose of assisting with the offset amount LEAs set-aside for the beginning or increasing the provision of equitable services (for private schools).

CARES Act-ESSER Funds-Reserve Grant

- The General Assembly appropriated state grant funding in the amount of $5,364,426 for FY21 grants to LEAs with approved residential facilities. Twenty approved facilities served by 18 LEAs are included in the FY21 Residential Treatment Facility State Grant. Of these 20 approved residential facilities, 16 are served by their LEAs as “schools” and four are served by their LEAs as “programs.” Georgia state law provides that for the purposes of accountability, all residential treatment facilities shall be treated as a single LEA and thus received allocations from the CARES Act funding.

CARES Act-ESSER Funds-Special Education Supplemental Relief

- This grant provides local education agencies funding necessary to offset the increased costs of special education services due to the impact of COVID-19 and gives LEAs the ability to better serve special education students during the pandemic.

CARES Act-ESSER Funds-State Charter Schools

- This grant allocation supported new or significantly expanded state charter schools with the offset of expenses related to COVID-19.

CARES Act-ESSER Funds-Georgia Network for Educational and Therapeutic Support (GNETS)

- The purpose of this grant was to provide GNETS, a program that provides therapeutic services and supports to students with severe disabilities, with emergency relief funds to address the impact that COVID-19 has had, and continues to have, on GNETS programs across Georgia.

CARES Act-ESSER Funds-Regional Educational Service Agency (RESA)

- Georgia has 16 Regional Educational Service Agencies (RESAs) strategically located in service districts throughout the state. The agencies were established for the purpose of sharing services designed to improve the effectiveness of the educational programs of member school systems. In addition, the RESAs assist GaDOE in promoting its initiatives. This CARES Act allocation supported RESAs’ offset with costs associated with distribution of Personal Protective Equipment (PPE) and the impacts of state revenue decreases due to COVID-19.

CARES Act-ESSER Funds-School Nursing

- These funds were provided to LEAs and GNETS facilities to fund additional school nursing personnel, supplies, telehealth services, and other similar needs. This grant allocated more resources directly to school nursing programs to offset the additional costs related to the impacts of COVID-19.
CARES Act & ARP Act-Educator Retention Bonuses

After issuing ninety percent of funds to the local educational agencies, State School Superintendent Richard Woods, in partnership with Governor Brian Kemp, chose to utilize a large portion of the ESSER II SEA reserve funds to provide one-time, $1,000 retention bonuses to all K-12 educators and support staff in the state.

ARP Act-ESSER III FFA-FCCLA Center and Camp John Hope

- The allocation will support the impact and loss of revenue experienced by the Georgia Future Farmers of America (FFA)-Family, Career, and Community Leaders of America (FCCLA) Center and Camp John Hope due to COVID-19.

Data and Transparency

As part of the data collection process, it is requested that each LEA submit a CARES Act Use of Funds form to inform the agency on how the LEA will allocate the grant funding. The LEAs identify categories and student subgroups for each original and amended budget where funding will be allocated to address the impacts of COVID-19. GaDOE has collected all forms from the 212 LEAs that received an allocation from the CARES Act-ESSER I formula grant where the final collection indicates the local educational agencies across the state responded to the immediate needs of their district during this time and budgeted their funds for the continuity of core staff and services and facilities equipment.

To ensure transparency of ESSER funds, GaDOE is developing a public data dashboard. This dashboard will allow anyone the opportunity to see how much each LEA has obligated and will be updated monthly. Additionally, based on the required Use of Funds form, the dashboard will allow the public to see the overarching categories for which each LEA has obligated funds to address the impacts of COVID-19.

iii. In supporting LEAs as they plan for the safe return to and continuity of in-person instruction and for meeting the academic, social, emotional, and mental health needs of students resulting from the COVID-19 pandemic, the extent to which the SEA is also using other Federal funding sources including but not limited to under the Elementary and Secondary Education Act of 1965 (“ESEA”), IDEA, Workforce Innovation and Opportunity Act (“WIOA”), funding for child nutrition services, and McKinney-Vento Homeless Assistance Act, and the funds to support the needs of students experiencing homelessness provided by section 2001(b)(1) of the ARP Act.

Please note that the needs of students experiencing homelessness must be addressed (along with the other groups disproportionately impacted by the COVID-19 pandemic) through the use of the ARP ESSER SEA reservations and the required LEA reservation for the academic impact of lost instructional time; the funding provided to support the needs of students experiencing homelessness by section 2001(b)(1) of the ARP Act is in addition to the supports and services provided with ARP ESSER funds.

Coordinating Federal Funding

Under State School Superintendent Richard Woods, there is a strong culture of coordination and collaboration at GaDOE. GaDOE leaders overseeing CTAE (who are in close coordination with our technical colleges, Georgia’s WIO recipient), special education (IDEA), ESEA programs, school nutrition,
and homelessness efforts regularly collaborate. Specifically, since the onset of COVID-19 these teams have worked to share innovative approaches to conducting monitoring, delivering technical assistance, applying for targeted waivers, and providing resources to districts and schools.

**Supporting the Needs of Students Experiencing Homelessness**

Currently, the GaDOE McKinney-Vento Education for Homeless Children and Youth (EHCY) program office supports local educational agencies (LEAs) that provide direct services to children and youth experiencing homelessness. Support efforts include professional development through individual LEA trainings, meetings, conferences, webinars, and workshops. Furthermore, the EHCY program office analyzes local, state, and national trend data related to homelessness. Regular program operations include training, CLIP reviews, dispute resolutions, grant administration, EHCY program monitoring, and budget review. Additionally, the EHCY program office partners with other GaDOE divisions and programs to coordinate support and ensure the inclusion of considerations that may affect children and youth experiencing homelessness. The EHCY program office also partners with various community and state organizations and agencies to address the needs of children and youth experiencing homelessness and their families.

GaDOE will reserve 25% of the funding provided for the needs of students experiencing homelessness by section 2001(b)(1) of the ARP Act and will support state activities that include but are not limited to:

- Modernizing data systems and communications protocols to identify and track the academic progress, participation, and engagement of students experience homelessness,
- Expanding quality professional learning for educators and other frontline support staff who directly work with students experiencing homelessness, and
- Coordinating with state agencies and non-profit organizations as well as community organizations to raise awareness and remove non-academic barriers for learning for students experiencing homelessness.

Unspent funds from the state reserve will be allocated in a proportional manner to Georgia school districts.

The remaining 75% of the funding provided for the needs of students experiencing homelessness by section 2001(b)(1) of the ARP Act will be granted to districts to support activities that include but are not limited to:

- Transportation services,
- System navigators,
- Counseling services, and
- Other LEA-identified strategies to support the needs of students experiencing homelessness, as allowable by section 2001(b)(1) of the ARP Act.

Overall, funding will be used by GaDOE so that the number of students experiencing homelessness who participate in school and show academic progress meets pre-pandemic levels.
D. Maximizing State-Level Funds to Support Students

The Department recognizes that States have an extraordinary opportunity to address the disproportionate impact of the COVID-19 pandemic on underserved students through the ARP Act’s required State set-asides to address the academic impact of lost instructional time, provide summer learning and enrichment programs, and provide comprehensive afterschool programs. In this section, SEAs will describe their evidence-based strategies for these resources.

1. Academic Impact of Lost Instructional Time: Describe how the SEA will use the funds it reserves under section 2001(f)(1) of the ARP Act (totaling not less than 5 percent of the State’s total allocation of ARP ESSER funds) on evidence-based interventions to address the academic impact of lost instructional time by supporting the implementation of evidence-based interventions, such as summer learning or summer enrichment, extended day, comprehensive afterschool programs, or extended school year programs, and ensure that such interventions respond to students’ academic, social, emotional, and mental health needs. The description must include:

   i. A description of the evidence-based interventions (e.g., providing intensive or high-dosage tutoring, accelerating learning) the SEA has selected, and the extent to which the SEA will evaluate the impact of those interventions on an ongoing basis to understand if they are working;

   ii. How the evidence-based interventions will specifically address the disproportionate impact of COVID-19 on certain groups of students, including each of the student groups listed in question A.3.i.-viii. When possible, please indicate which data sources the SEA will use to determine the impact of lost instructional time; and

   iii. The extent to which the SEA will use funds it reserves to identify and engage 1) students who have missed the most in-person instruction during the 2019-2020 and 2020-2021 school years; and 2) students who did not consistently participate in remote instruction when offered during school building closures.

<table>
<thead>
<tr>
<th>Priority 1: Accelerate Learning</th>
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<tbody>
<tr>
<td>Identify Learning Opportunities</td>
</tr>
<tr>
<td>- Requiring LEA ARP ESSER Plan to address learning opportunity loss and accelerate learning</td>
</tr>
<tr>
<td>- Funding state- and regional-level Academic Recovery Specialists to support district and school efforts to address unfinished learning</td>
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</tbody>
</table>
- Strengthening Formative Instructional Practices
- Modernizing information systems to support academic progress and achievement; protect student privacy and ensure cybersecurity while promoting transparency

**Focus on the Fundamentals**
- Measuring literacy outcomes
- Funding district literacy plans
- Developing personalized literacy and numeracy plans for students and providing intensive, personalized professional learning in literacy and numeracy instruction for teachers
- Implementing the revised K-12 Mathematics and English Language Arts (ELA) standards
- Shoring up core instruction (i.e., Science and Social Studies)
- Supporting cross-disciplinary collaboration (i.e., K-5, CTAE, STEM/STEAM, etc.)

**Remove Barriers to Learning**
- Funding state-level school nurse, school psychologist, and school social worker specialists to support student needs
- Establishing school-based health clinics
- Funding for school counselors, school nurses, school psychologists, school social workers, and other Education Support Professionals (ESPs)
- Providing mental health awareness training for educators to identify suicidal thoughts, abuse, and trauma experienced by students
- Coordinating state and community resources and services to provide wraparound supports; funding for a state-level wraparound supports coordinator

**Priority 2: Personalize Supports**

**Provide High-Quality Resources**
- Creating and curating Georgia-developed, standards-aligned instructional resources, videos, modules, etc.
  - Funding Digital Learning and Resource Specialists embedded in GaDOE’s Teaching and Learning team
  - Expanding Georgia Virtual School resources; updating and expanding virtual courses

**Provide Responsive and Relevant Professional Learning**
- Developing and delivering on-demand, personalized professional learning
- Organizing offering Professional Learning Communities (PLCs) facilitated by expert Georgia classroom teachers

**Elevate Educators**
- Expanding and strengthening the teacher pipeline by implementing strategies to boost recruitment and retention, specifically in high-need fields
- Developing a statewide “gig” teaching model that allows retired educators, non-traditional teachers, and classroom teachers to provide virtual mentoring, tutoring, and additional courses across the state

**Coordinate Support for Districts**
- Establishing Continuous Improvement Teams (CITs) of cross-agency experience and expertise to liaise with district and school leaders in a coherent and effective manner, coordinate efforts, and connect with programs, initiatives, and resources

**Priority 3: Promote Opportunity**

**Expand Opportunity**
- Preserving co-curricular opportunities provided by Career and Technical Student Organizations (CTSOs)
• Providing “opportunity grants” to schools to fund access to CTAE, fine arts, world language, dual enrollment, gifted, AP, IB, health and physical education, STEM/STEAM, computer science, work-based learning/apprenticeships, and industry credentials/certified programs
• Establishing the Office of Rural Education and Innovation to coordinate efforts and spearhead transformational change in low wealth, low population school districts in high poverty regions

**Ensure a 21st Century Standard of Learning**
• Increasing bandwidth and strengthening technology infrastructure
• Establishing a “21st Century Standard of Learning” for bandwidth, devices, training, and outfitting classrooms
• Funding for a state-level library media specialist position

**Coordinating Services and Supports for All Districts and Schools**

GaDOE implemented Continuous Improvement Teams (CITs) as a school improvement strategy to effectively support federal identified districts and schools. These cross-agency teams consisting of district/school effectiveness specialists, content experts, federal program specialists, and others provide a way for school leaders to interface with agency supports in a cohesive and responsive manner.

These teams coach school leaders through the problem-solving cycle that supports existing improvement plans and connects leaders with agency supports, resources, professional learning, technical assistance, and programs/initiatives. In short, CIT Leads act as a liaison between districts and our agency, along with other regional and statewide supports.

Building on the success of this initiative, GaDOE plans to utilize ARP ESSER funds to hire additional CIT Leads to coordinate supports to non-federally identified districts and schools. Not only do we feel strongly about this proactive approach, but when a school does become identified for needing more intensive interventions, this expanded support structure will provide for a more seamless transition. In addition to utilizing data, the CIT model will also provide a continuous feedback loop to GaDOE helping to inform and prioritize our agency’s efforts.

**Renewing Rural Georgia**

During the pandemic, the unique challenges associated with rural poverty moved to the forefront for our state leaders. As a former educator and school leader from rural Georgia, State School Superintendent Richard Woods personally understands not only the challenges facing families, students, and educators, but also the opportunity a transformational investment could make in the lives of children and their communities.

Gaps that existed prior to the pandemic such as connectivity, teacher retention and recruitment, healthcare, resources and funding, workforce development, and more were only exacerbated by the pandemic.

GaDOE plans to utilize ARP ESSER funds to establish an Office of Rural Education and Innovation within the agency to provide a continued, cabinet-level voice for the needs of rural Georgia, establish state and community partnerships to channel resources, and identify funding opportunities within the agency to support rural areas of our state.
The Office of Rural Education will work with low wealth school districts with low student populations in high poverty/distressed regions of Georgia. GaDOE will make a substantial investment of its ARP ESSER funds to bring about transformative, sustained change for these identified regions.

The leader of this new Office will be empowered to hire staff and structure a team in support of identified regions, bringing on the expertise, insight, and experience needed to address the unique needs of rural Georgia. The leader will be charged with working hand-in-hand with school and community leaders to address gaps that were brought to the forefront during the pandemic, chart a roadmap beyond recovery to renewal, and tackle any additional barriers that directly impact academic outcomes and opportunities for students.

**Increasing Bandwidth for Schools**

GaDOE will utilize ARP ESSER funds to increase bandwidth for schools as well as support additional infrastructure and equipment that increases connectivity for students and educators.

**Creating and Curating Standards-Aligned Instructional Resources and Courses**

GaDOE will utilize ARP ESSER funds to embed Digital Learning and Resource Specialists throughout our Teaching and Learning team to create and curate Georgia-developed, standards-aligned instructional resources and courses for educators and develop and deliver professional learning on high-impact instructional practices that support virtual learning.

**Provide Responsive and Relevant Professional Learning**

GaDOE will utilize ARP ESSER funds to develop and deliver on-demand, personalized professional learning. Expert Georgia classroom teachers will facilitate the organization of Professional Learning Communities (PLCs).

**Funding for a State-Level Library Media Specialist**

Recognizing the impact the school library media program has in supporting student learning, the GaDOE will provide ARP ESSER funding to hire a state-level Library Media Specialist to support school district Library Media Specialists and classroom teachers.

While helping bridge the digital divide and putting state standards into action, the school library media specialist encourages reading for learning, reading for fun, and reading for life. The school library media specialist is a teacher, an instructional partner, an informational specialist, and a school library media program administrator. School library media specialists directly affect student achievement by collaborating and planning with teachers, teaching information literacy, designing assessment procedures, and providing supplemental curriculum material.

2. Evidence-Based Summer Learning and Enrichment Programs: Describe how the SEA will use the funds it reserves under section 2001(f)(2) of the ARP Act (totaling not less than 1 percent of the State’s total allocation of ARP ESSER funds) for evidence-based summer learning and enrichment programs, including those that begin in Summer 2021, and ensure such programs respond to students’ academic, social, emotional, and mental health needs. The description must include:

   i. A description of the evidence-based programs that address the academic, social, emotional, and mental health needs of students (e.g., providing intensive or
high-dosage tutoring, accelerating learning) the SEA has selected, and the extent to which the SEA will evaluate the impact of those programs;

ii. How the evidence-based programs will specifically address the disproportionate impact of COVID-19 on certain groups of students, including each of the student groups listed in question A.3. i.–viii. When possible, please indicate which data sources the SEA will use to identify students most in need of summer learning and enrichment programs; and

iii. The extent to which the SEA will use funds it reserves to identify and engage 1) students who have missed the most in-person instruction.

Delivering Quality Summer Learning and Enrichment Programs

GaDOE will use 1% of ($42,493,712) the funds reserved under section 2001(f)(2) of the ARP Act to provide evidence-based summer learning and enrichment programs for students across the state. In order to ensure that programming is widely available and of a high caliber that will promote recovery and future academic and development success, the Georgia Statewide Afterschool Network (GSAN) will administer the Building Opportunities in Out-of-School Time (BOOST) Grants. These grants will include training and technical assistance to grantees to build capacity and support quality improvements and support the data collection and evaluation of out-of-school time initiatives.

To expand access to and improve the quality of afterschool and summer learning opportunities across Georgia, a competitive grants program to support community-based organizations in offering summer enrichment and comprehensive afterschool programming will be created. The BOOST program would offer three-year grants, renewed annually, to community-based organizations that operate comprehensive out-of-school time (OST) programming over the summer months, after school during the academic year, or year-round, with the goal of providing evidence-based afterschool and summer programming focusing on academic and non-academic barriers for students most impacted by the COVID-19 pandemic.

The grants will support students’ academic acceleration, connectedness and well-being, utilizing a whole child approach to:

1. Expand access to serve more youth, with an emphasis on children and communities most impacted by the pandemic,
2. Reduce barriers, such as transportation and enrollment costs, to ensure access for all and/or
3. Increase programmatic quality and expand or enhance supports and services offered.

To reduce the burden on community-based programs, increase accessibility of the application by a variety of program types, and ensure geographic reach of programming, two grant competitions would be administered.

1. **Organizations with Statewide Reach and Impact - $45 million.**
   Grants of $1 million - $5 million annually would be awarded to entities with a demonstrated track record of success, that operate year-round programming and would be serving at least 2,000 youth annually across at least 15 counties. Grant size would be determined by number of sites and number of youth served annually. Potential
applicants include, but are not limited to, the Georgia Alliance of Boys & Girls Clubs, the Georgia Alliance of YMCAs, Communities in Schools of Georgia, the Georgia Recreation and Parks Association, and 4-H. It is estimated that 4-6 statewide grants would be awarded.

2. **Community Driven Organizations - $40 million.**

Grants would be awarded to community-based organizations operating afterschool and/or summer learning programs. Grants of up to $50,000 per site would be available to organizations operating academic-year-only or summer-only programs. Grants of up to $100,000 per site would be available to organizations operating year-round programming. Each applicant may apply for funding for up to five program sites per organization, with a maximum grant size of $500,000 per year. Grant size would be determined by number of youth served. It is estimated that 100-120 community grants would be awarded.

Non-profit organizations and municipalities, such as Parks & Recreation Departments, would be eligible to apply. Public schools and districts would not be eligible.

**Building Sustainable Efforts**

GSAN will work with the Regional Educational Service Agencies (RESAs) to provide training on best practices for afterschool and summer learning and provide them with tools and resources to support their work with local school districts. GSAN will also host an annual convening to bring together school and community partners to share best practices and strategies. The convening will be virtual in Year 1 and in-person options will be explored in Years 2 and 3. In the later years, the convening will focus on how to leverage new and existing partnerships to build sustainable efforts and highlight lessons learned to shape the future of school-community partnerships.

**Evaluating Effectiveness and Measuring Impact**

GSAN will support GaDOE in collecting and tracking BOOST-funded afterschool and summer learning efforts by gathering data from LEAs and schools to which GSAN is providing coaching and, similarly, to BOOST grantees, developing case studies of innovation, impact, and successful strategies. GSAN will also support the agency in exploring how to best include education outcomes in district-led afterschool and summer learning efforts.

3. **Evidence-Based Comprehensive Afterschool Programs:** Describe how the SEA will use the funds it reserves under section 2001(f)(3) of the ARP Act (totaling not less than 1 percent of the State’s total allocation of ARP ESSER funds) for evidence-based comprehensive afterschool programs (including, for example, before-school programming), and ensure such programs respond to students’ academic, social, emotional, and mental health needs. The description must include:

   i. A description of the evidence-based programs (e.g., including partnerships with community-based organizations) the SEA has selected, and the extent to which the SEA will evaluate the impact of those programs;

   ii. How the evidence-based programs will specifically address the disproportionate impact of COVID-19 on certain groups of students, including each of the student groups listed in question A.3.i.-viii. When possible, please indicate which data
sources the SEA will use to identify students most in need of comprehensive afterschool programming; and

iii. the extent to which the SEA will use funds it reserves to identify and engage 1) students who have missed the most in-person instruction during the 2019-2020 and 2020-2021 school years; and 2) students who did not consistently participate in remote instruction when offered during school building closures.

Delivering Quality Summer Learning and Enrichment Programs

GaDOE will use 1% of ($42,493,712) the funds reserved under section 2001(f)(3) of the ARP Act to provide evidence-based afterschool learning programs for students across the state. In order to ensure that programming is widely available and of a high caliber that will promote recovery and future academic and development success, the Georgia Statewide Afterschool Network (GSAN) will administer the Building Opportunities in Out-of-School Time (BOOST) Grants. These grants will include training and technical assistance to grantees to build capacity and support quality improvements and support the data collection and evaluation of out-of-school time initiatives.

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   Non-profit organizations and municipalities, such as Parks & Recreation Departments, would be eligible to apply. Public schools and districts would not be eligible.

**Building Sustainable Efforts**

   GSAN will work with the Regional Educational Service Agencies (RESAs) to provide training on best practices for afterschool and summer learning and provide them with tools and resources to support their work with local school districts. GSAN will also host an annual convening to bring together school and community partners to share best practices and strategies. The convening will be virtual in Year 1 and in-person options will be explored in Years 2 and 3. In the later years, the convening will focus on how to leverage new and existing partnerships to build sustainable efforts and highlight lessons learned to shape the future of school-community partnerships.

**Evaluating Effectiveness and Measuring Impact**

   GSAN will support GaDOE in collecting and tracking BOOST-funded afterschool and summer learning efforts by gathering data from LEAs and schools to which GSAN is providing coaching and, similarly, to BOOST grantees, developing case studies of innovation, impact, and successful strategies. GSAN will also support the agency in exploring how to best include education outcomes in district-led afterschool and summer learning efforts.

4. **Emergency Needs:** If the SEA plans to reserve funds for emergency needs under section 2001(f)(4) of the ARP Act to address issues responding to the COVID-19 pandemic, describe the anticipated use of those funds, including the extent to which these funds will build SEA and LEA capacity to ensure students’ and staff’s health and safety; to meet students’ academic, social, emotional, and mental health needs; and to use ARP ESSER funds to implement evidence-based interventions.

   As previously mentioned, the State has already funded – with ESSER II and ARP state reserve funds – Educator Retention Bonuses for all teachers and education support personnel in Georgia’s K-12 public schools to support stronger recruitment and retention of these critical positions to ensure the foundation of the workforce continues to be strong when COVID-19 no longer has its current negative impact.

   The State made a reduction to the funding for the CTAE and Agricultural Education programs. ARP Act ESSER III funds will be used to make up the difference between the funding needs and what the General Assembly appropriated for the programs.
State School Superintendent Richard Woods deemed this an essential need to protect opportunities for students and to support educators (i.e., CTAE student organizations, co-curricular activities, and extended day/year for teachers), utilizing reserve funds to fill the gap in State Grant funds for CTAE and Agricultural Education programs for fiscal year 2022.

ARP Act funding needs for FY22 CTAE and Agriculture Programs:

<table>
<thead>
<tr>
<th>Program</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>CTAE</td>
<td>$621,618.00</td>
</tr>
<tr>
<td>Ag Ed</td>
<td>$229,643.00</td>
</tr>
<tr>
<td>Career Technical Student Organizations (CTSOs)</td>
<td>$200,000</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>$1,051,261</strong></td>
</tr>
</tbody>
</table>

GaDOE also plans to allocate SEA reserve funds under section 2001(f)(4) of the ARP Act to provide funding to several regional and statewide organizations that provide direct student services or professional development services for educators. Regional Educational Service Agencies (RESAs) and Residential Treatment Facilities will receive funding to ensure the critical services they provide students and educators are not negatively impacted by the effects of COVID-19. Additionally, resources will continue to be provided to the Georgia Network for Educational and Therapeutic Support (GNETS) for intentional therapeutic services.

GaDOE will utilize ARP ESSER funds to modernize the agency’s information systems to ensure strong cybersecurity, student privacy, and industry standards while providing robust, real-time visual, analytic, and reporting tools to empower school leaders and educators to identify and support the individualized needs of their students and strengthen transparent access to district- and school-level data for communities, policymakers, and taxpayers.

With a large population of military personnel – and students – in Georgia, GaDOE will explore creating a state-level Military Liaison position to work directly with local military state liaison officers to ensure military students are provided the same supports and opportunities as all students.

E. Supporting LEAs in Planning for and Meeting Students’ Needs

The Department recognizes that the safe return to in-person instruction must be accompanied by a focus on meeting students’ academic, social, emotional, and mental health needs, and by addressing the opportunity gaps that existed before – and were exacerbated by – the pandemic. In this section, SEAs will describe how they will support their LEAs in developing high-quality plans for LEAs’ use of ARP ESSER funds to achieve these objectives.

1. **LEA Plans for the Use of ARP ESSER Funds**: Describe what the SEA will require its LEAs to include in LEA plans consistent with the ARP ESSER requirements for the use of ARP ESSER funds, how the SEA will require such plans to be made available to the public, and the deadline by which the LEA must submit its ARP ESSER plan (which must be a reasonable timeline and should be within no later than 90 days after receiving its ARP ESSER allocation). The LEA plans must include, at a minimum:
i. The extent to which and how the funds will be used to implement prevention and mitigation strategies that are, to the greatest extent practicable, in line with the most recent CDC guidance, in order to continuously and safely operate schools for in-person learning;

ii. How the LEA will use the funds it reserves under section 2001(e)(1) of the ARP Act (totaling not less than 20 percent of the LEA’s total allocation of ARP ESSER funds) to address the academic impact of lost instructional time through the implementation of evidence-based interventions, such as summer learning or summer enrichment, extended day, comprehensive afterschool programs, or extended school year programs;

iii. How the LEA will spend its remaining ARP ESSER funds consistent with section 2001(e)(2) of the ARP Act; and

iv. How the LEA will ensure that the interventions it implements, including but not limited to the interventions under section 2001(e)(1) of the ARP Act to address the academic impact of lost instructional time, will respond to the academic, social, emotional, and mental health needs of all students, and particularly those students disproportionately impacted by the COVID-19 pandemic, including students from low-income families, students of color, English learners, children with disabilities, students experiencing homelessness, children and youth in foster care, and migratory students.

It is GaDOE’s commitment to ensure LEAs across Georgia have the necessary technical assistance to promote accountability, transparency, and the effective use of ARP ESSER funds by offering multiple opportunities and methods to access resources, video and webinar trainings, as well as open office hour sessions where LEAs can submit questions from the field ahead of time regarding the ARP ESSER grants and collectively answer them during the session.

GaDOE’s streamlined LEA ARP ESSER Plan application required the digital signature for the specified LEA personnel’s understanding that in accepting ARP ESSER funds the LEA would adhere to the requirements in section 2001(e)(1) of the ARP Act and the requirements relating to the ARP ESSER funds published in the Federal Register. The application includes specific assurances where the LEA agrees to the following assurance:

An LEA that receives ARP ESSER funds will develop, submit to GaDOE, and make publicly available on the LEA’s website, a plan for the LEA’s use of ARP ESSER funds. The plan, and any revisions to the plan will be submitted consistent with procedures.

The LEA assures that ARP ESSER funds will be used for their intended purposes, including:

- Whether and how they will use the funds specifically for COVID-19 prevention and mitigation strategies,
- How the funds will be used to address the academic impact of lost instructional time through the implementation of evidence-based interventions, and
- How the LEA will ensure that those interventions respond to the academic and non-academic barriers of all students and particularly those students disproportionately impacted by the COVID-19 pandemic.
The application provides the opportunity for LEAs to express the top 2-3 priorities they have determined as the most pressing needs for students and schools within the LEA as a result of COVID-19 and the data source that illustrates why the submitted priorities were selected.

The next section of the application introduces the learning opportunity loss plan template that supports LEAs’ decision making as they plan evidence-based interventions to support accelerated learning opportunities for students impacted by the COVID-19 pandemic.

The template follows the Georgia’s Systems of Continuous Improvement Cycle, with a focus on the Coherent Instructional System (to address learning opportunity loss). It was emphasized to LEAs that accelerated learning and strong instruction are interdependent.

Accelerated learning cannot take place with poor instructional practices in place, and strong instruction will not take place if educational practitioners cannot effectively address unfinished learning. Therefore, it is important to develop the leaders and teachers of the district on the concepts and best practices of accelerated learning and strong instruction.

Embedded within the document are links to guiding questions and research that can support the LEAs’ decisions for interventions and provide guidance on how to implement the interventions.

LEAs must provide responses to the following statements/questions:

- What data needs to be collected and synthesized to determine student needs caused by learning opportunity loss?
- Analyze data to identify strengths and challenges and determine outcomes.
- What are you currently using (interventions, strategies, resources, community partnerships) to address learning opportunity loss?
- What data have you collected to know if current efforts have been successful?
- What data will you collect and analyze to identify ongoing needs?
- What is the selected intervention(s)?
- Which regions/clusters/schools will implement each intervention selected?
- Which grades or grade bands will participate in each intervention selected?
- Which student subgroup(s) will participate in each intervention selected?
- Which grades or grade bands will participate in each intervention selected?
- What is the target student population(s) for each intervention selected?
- What are the proposed number of hours added to the school year?
- What training is required for staff, students, and parents for each intervention selected?
- What resources (interventions, strategies, community partnerships) are required for effective implementation of each intervention selected?
• *What is the formative assessment plan to evaluate student progress and impact for each intervention selected?*

• *What is the proposed timeline to implement each intervention selected?*

• *How will you evaluate implementation fidelity and effectiveness on an ongoing basis of each intervention selected by specific subgroups?*

Additionally, the LEA provides the estimation of the approximate percentage of the LEA’s ESSER III formula funds allocated for allowable activities or purposes addressing learning loss.

All Georgia school districts should consult with and ensure buy-in from community members in an open and transparent manner throughout the development and implementation of their LEA ARP ESSER Plans.

2. **LEA Consultation**: Describe how the SEA will, in planning for the use of ARP ESSER funds, ensure that, consistent with the ARP ESSER requirements, its LEAs engage in meaningful consultation with stakeholders, including, but not limited to:

   i. students;
   
   ii. families;
   
   iii. school and district administrators (including special education administrators); and

   iv. teachers, principals, school leaders, other educators, school staff, and their unions.

The LEA must also engage in meaningful consultation with each of the following to the extent present in or served by the LEA:

   i. Tribes;
   
   ii. civil rights organizations (including disability rights organizations); and

   iii. stakeholders representing the interests of children with disabilities, English learners, children experiencing homelessness, children and youth in foster care, migratory students, children who are incarcerated, and other underserved students.

The description must also include how the SEA will ensure that LEAs provide the public the opportunity to provide input in the development of the LEA’s plan for the use of ARP ESSER funds and take such input into account.

During the time that funds were made available to LEAs, GaDOE followed the same process of distributing funds as the U.S. Department of Education, communicating the total ARP ESSER allocation, the LEA’s 2/3 allocation and last, the amount the LEA stands to receive after the U.S. Department of Education approves the SEA’s application for the remainder of its allocation.
Once the remaining funds are made available, all LEAs will be required to submit an amended budget in the Consolidated Application to access the total ARP ESSER allocation. As a result, to ensure that LEAs provided the public the opportunity to provide input in the development of the LEA’s plan for the use of ARP ESSER funds and take such input into account, the LEA must submit documentation or evidence within their amended LEA ARP ESSER application where the LEA agreed through the digital signature upon submitting the LEA ARP ESSER application.

3. Describe how the SEA will support and monitor its LEAs in using ARP ESSER funds. The description must include:

   i. How the SEA will support and monitor its LEAs’ implementation of evidence-based interventions that respond to students’ academic, social, emotional, and mental health needs, such as through summer learning or summer enrichment, extended day, comprehensive afterschool programs, or extended school year programs – including the extent to which the SEA will collect evidence of the effectiveness of interventions employed;

   ii. How the SEA will support and monitor its LEAs in specifically addressing the disproportionate impact of the COVID-19 pandemic on certain groups of students, including each of the student groups listed in question A.3.i.-viii; and

   iii. How the SEA will support and monitor its LEAs in using ARP ESSER funds to identify, reengage, and support students most likely to have experienced the impact of lost instructional time on student learning, such as:

      a) Students who have missed the most in-person instruction during the 2019-2020 and 2020-2021 school years;

      b) Students who did not consistently participate in remote instruction when offered during school building closures; and

      c) Students most at-risk of dropping out of school.

GaDOE’s LEA ARP ESSER Plan application includes links to guiding questions and research that can support the local education agencies (LEAs) decisions for interventions and provide guidance on how to implement the interventions.

LEAs must provide responses to the following statements/questions:

- *What data needs to be collected and synthesized to determine student needs caused by learning opportunity loss?*
- *Analyze data to identify strengths and challenges and determine outcomes.*
- *What are you currently using (interventions, strategies, resources, community partnerships) to address learning opportunity loss?*
- *What data have you collected to know if current efforts have been successful?*
- *What data will you collect and analyze to identify ongoing needs?*
• What is the selected intervention(s)?
• Which regions/clusters/schools will implement each intervention selected?
• Which grades or grade bands will participate in each intervention selected?
• Which student subgroup(s) will participate in each intervention selected?
• Which grades or grade bands will participate in each intervention selected?
• What is the target student population(s) for each intervention selected?
• What are the proposed number of hours added to the school year?
• What training is required for staff, students, and parents for each intervention selected?
• What resources (interventions, strategies, community partnerships) are required for effective implementation of each intervention selected?
• What is the formative assessment plan to evaluate student progress and impact for each intervention selected?
• What is the proposed timeline to implement each intervention selected?
• How will you evaluate implementation fidelity and effectiveness on an ongoing basis of each intervention selected by specific subgroups?

GaDOE will provide opportunities for LEAs to amend their plans throughout the 2021-2022 school year to respond to current data and on-the-ground needs. GaDOE will also schedule periodic check-ups to discuss the implementation and effectiveness of district strategies, methods for monitoring progress, and impact on student achievement as well as collaborative opportunities for districts to share best practices and innovative approaches.

4. Describe the extent to which the SEA will support its LEAs in implementing additional strategies for taking educational equity into account in expending ARP ESSER funds, including but not limited to:

   i. Allocating funding both to schools and for districtwide activities based on student need, and

   ii. Implementing an equitable and inclusive return to in-person instruction. An inclusive return to in-person instruction includes, but is not limited to, establishing policies and practices that avoid the over-use of exclusionary discipline measures (including in- and out-of-school suspensions) and creating a positive and supportive learning environment for all students.

Using Funds Strategically and Serving the Needs of All Students

GaDOE is committed to providing coaching and supports that guide LEAs toward the strategic and effective use of funds to ensure students get the most learning advantage as schools fully recover from the COVID pandemic.
It has been suggested that school leaders consider the strategic planning process, including any charter contracts, waivers, and the needs identified in the consolidated LEA improvement plan (CLIP) and all School Improvement Plans (SIP), when determining needs and coordinating fund sources (state, federal, and local) that could be used to address individual student needs.

Additionally, the agency has communicated to LEAs to review the allowability requirements of various funding sources and consider the coordination of such funds during this process.

An emphasis was placed on LEAs fully understanding that district and school strategies are determined through collaborative planning groups that include school leaders, teachers, curriculum directors, student support services directors, researchers, assessment/accountability directors, Title Directors, and technology directors as well as finance and business leaders for the district offices.

As the agency continues to communicate this message it will result in the budgeting process following a strategic thinking process for allocating funding both to schools and for districtwide activities based on student needs.

All Georgia school districts should consult with and ensure buy-in from community members in an open and transparent manner when making decisions on allocating funding both to schools and for districtwide activities.

**Returning to In-Person Instruction**

Given increased availability of effective vaccines and decreased case counts, Georgia is planning a full return to in-person instruction for the 2021-2022 school year. Georgia is a local control state with ultimate reopening and operational authority given to elected local boards of education, but districts continue to signal their desire and commitment to full in-person instruction for the upcoming school year.

**Ensuring a Supportive Learning Environment for All Students**

State- and regional-level climate specialists assist districts and schools across the state in ensuring all students and educators can learn and teach in a supportive learning environment. Multiple data points from parent, student, and teacher surveys to attendance, discipline, and academic data are provided to school leaders and support staff as formative indicators of school environment. This data is publicly reported in an open and transparent manner in order to ensure community members understand the learning environments of their local schools. This data can also serve as indicators of trends and progress toward strategic goals as part of schools’ improvement plans.

Codified in state law, Georgia’s School Climate Rating serves as a measure to hold local and state leaders accountable for ensuring a positive and supportive learning environment for all students.

**F. Supporting the Educator Workforce**

The Department recognizes the toll that the COVID-19 pandemic has taken on the Nation’s educators as well as students. In this section, SEAs will describe strategies for supporting and stabilizing the educator
workforce and for making staffing decisions that will support student’ academic, social, emotional, and mental health needs.

1. **Supporting and Stabilizing the Educator Workforce:**
   
i. Describe the extent to which the State is facing shortages of educators, education administration personnel, and other school personnel involved in safely reopening schools, and the extent to which they vary by region/type of school district and/or groups of educators (e.g., special educators and related services personnel and paraprofessionals; bilingual or English as a second language educators; science, technology, engineering, and math (“STEM”) educators; career and technical education (“CTE”) educators; early childhood educators). Cite specific data on shortages and needs where available.

**CARES Act & ARP Act-Educator Retention Bonuses**

State School Superintendent Richard Woods, in partnership with Governor Brian Kemp, chose to utilize a large portion of the ESSER II SEA reserve funds to provide one-time, $1,000 retention bonuses to all K-12 educators and support staff in the state.

The payments are intended for all teachers and education support personnel in Georgia's K-12 public schools, including – but not limited to – teachers, paraprofessionals, school counselors, school psychologists, school nurses, custodians, bus drivers, school nutrition staff, media specialists, clerical staff and administrative assistants, school principals, assistant principals, instructional coaches, therapists, and long-term substitutes.

The bonus is being provided to teachers and education support staff to support stronger recruitment and retention of these critical positions, as a gesture of gratitude for their work and sacrifices during the COVID-19 pandemic, and to ensure the foundation of the workforce continues to be strong when COVID-19 no longer has its current negative impact.

**Identifying and Addressing Educator Shortages**

GaDOE provides a publicly available Teacher Pipeline dashboard (see: [https://www.georgiainsights.com/teacher-pipeline.html](https://www.georgiainsights.com/teacher-pipeline.html)) that displays teacher supply (by teacher preparation provider) and demand (by content area and grade band), which can be filtered by school district and P-20 collaborative region (for more information on GaDOE’s P-20 work, [click here](#)). This data, along with ongoing dialogue between local school systems and teacher preparation providers, informs regional plans to identify and address on-going and anticipated educator shortages.

In addition to the state utilizing ARP ESSER funds to strengthen data reporting and the work of the P-20 collaboratives, GaDOE will work with partners to strategically target resources for:

- **Expanding the educator pipeline** by exploring strategies that include but are not limited to covering the costs of endorsements and certification exams/fees, Teaching as a Profession pathway and Grow Your Own initiatives, paraprofessionals to teachers initiatives, teacher leaders to school leaders initiatives, alternative certification routes, loan forgiveness, and more.
• **Strengthening the educator pipeline** by exploring strategies that include but are not limited to supporting induction, mentoring, and coaching as well as providing real-world classroom simulations.

• **Developing a statewide “gig” teaching model** that allows retired educators, non-traditional teachers, and classroom teachers to provide virtual mentoring, tutoring, and additional courses across the state.

GaDOE plans to utilize ARP ESSER funds for a robust professional learning platform that can be utilized by districts and schools across the state to deliver quality, on-demand professional learning to all educators and staff. In addition to providing personalized supports, we will create online Professional Learning Communities (PLCs) supporting content areas and courses, facilitated by virtual specialists who are experienced Georgia classroom teachers, and provide an online space for educators to collaborate, ask questions, share resources, and network.

GaDOE will also prioritize ARP ESSER funds to make large investments in developing/curating high-quality, Georgia-developed instructional resources and supporting high impact and innovative instructional practices that:

• **Shore up foundational skills in literacy and numeracy** and support the effective implementation of the newly revised K-12 Mathematics and English Language Arts (ELA) standards.

• **Strengthen core instruction across all grades and academic disciplines** (including Science and Social Studies) through the development and curation of high-quality, Georgia-developed resources, professional learning, and high impact instructional practices.

• **Expand opportunity and support a well-rounded education** (including CTAE, fine arts, world language, dual enrollment, gifted, AP, IB, health and physical education, STEM/STEAM, and computer science opportunities across the state) by expanding the number of certified/endorsed teachers and providing grants for equipment, supplies, and more.

ii. Describe how the SEA will assist its LEAs in identifying the most urgent areas of shortages or potential shortages, with particular plans for individual LEAs facing the most significant needs (e.g., by avoiding layoffs, providing high-quality professional learning opportunities, and addressing the impact of stress or trauma on educators). Include a description of how other Federal COVID-19 funding (e.g., ESSER and GEER funds under the CARES Act and CRRSA Act) have already been used to avoid layoffs during the COVID-19 pandemic.

GaDOE utilizes a long-existing structure, P-20 collaboratives (for more information on GaDOE’s P-20 work, [click here](https://www.georgiainsights.com/teacher-pipeline.html)) to identify the most urgent areas of shortages. The data from the publicly available Teacher Pipeline dashboard (see: [https://www.georgiainsights.com/teacher-pipeline.html](https://www.georgiainsights.com/teacher-pipeline.html)) along with ongoing dialogue between local school systems and teacher preparation providers will inform regional-level and district-level action plans to identify and address educator shortages. Additionally, GaDOE will share out best practices and innovative approaches to recruiting and retaining educators and support staff in high-need areas.
CARES Act & ARP Act-Educator Retention Bonuses

State School Superintendent Richard Woods, in partnership with Governor Brian Kemp, chose to utilize a large portion of the ESSER II SEA reserve funds to provide one-time, $1,000 retention bonuses to all K-12 educator and support staff in the state.

The payments are intended for all teachers and education support personnel in Georgia's K-12 public schools, including – but not limited to – teachers, paraprofessionals, school counselors, school psychologists, school nurses, custodians, bus drivers, school nutrition staff, media specialists, clerical staff and administrative assistants, school principals, assistant principals, instructional coaches, therapists, and long-term substitutes.

The bonus is being provided to teachers and education support staff to support stronger recruitment and retention of these critical positions as a gesture of gratitude for their work and sacrifices during the COVID-19 pandemic, and to ensure the foundation of the workforce continues to be strong when COVID-19 no longer has its current negative impact.

Locally, school districts have followed the state’s model by utilizing their own funding to support continuity of services, provide retention bonuses to staff, incentivize supplemental learning and recruitment of substitutes, and target additional incentives and strategies to fill high needs areas.

iii. Describe the actions the SEA will take to fill anticipated gaps in certified teachers for the start of the 2021-2022 school year and to what extent the SEA will further support its LEAs in expanding the educator pipeline and educator diversity while addressing the immediate needs of students disproportionately impacted by the pandemic (e.g., recruiting teaching candidates to provide high-dosage tutoring or implementing residencies for teacher candidates)

In addition to the state utilizing ARP ESSER funds to strengthen data reporting and the work of the P-20 collaboratives, GaDOE will work with partners to strategically target resources for:

- **Expanding the educator pipeline** by exploring strategies that include but are not limited to covering the costs of endorsements and certification exams/fees, Teaching as a Profession pathway and Grow Your Own initiatives, paraprofessionals to teachers initiatives, teacher leaders to school leaders initiatives, alternative certification routes, loan forgiveness, and more.
- **Strengthening the educator pipeline** by exploring strategies that include but are not limited to supporting induction, mentoring, and coaching as well as real-world classroom simulations.
- **Developing a statewide “gig” teaching model** that allows retired educators, non-traditional teachers, and classroom teachers to provide virtual mentoring, tutoring, and additional courses across the state.

The strategies above ensure a personalized, regional- and district-level approach to addressing shortage areas will maximizing the positive impact for all students.

2. **Staffing to Support Student Needs:** Describe the extent to which the SEA has developed or will develop strategies and will support its LEAs in increasing student access to key support staff within school buildings, including school counselors, special education personnel, nurses, social workers, and
psychologists (e.g., hiring additional personnel or freeing up these staff to focus on providing services to students).

GaDOE already utilized funding to support school nurses during the 2020-2021 school year. Specifically, CARES Act-ESSER funded additional school nursing personnel, supplies, telehealth services, and other similar needs. This grant allocated more resources directly to school nursing programs to offset the additional costs related to the impacts of COVID-19.

In addition to already state- and federally funded agency-level positions supporting school nurses and special education personnel, GaDOE will utilize ARP ESSER funds to hire school nurse, school social worker, and school psychologist positions at the state level to support these staff in districts and schools with professional learning, technical assistance, resources, and supports.

GaDOE will continue to provide detailed guidance to districts for utilizing various federal funding sources to increase student access to key support staff and will explore expanding granted funds to districts beyond school nurses to support the hiring and supplies for key support staff such as school counselors, school social workers, school psychologists, and other Education Support Professionals (ESPs).

Working with partners, GaDOE will provide ARP ESSER funds to support school-based health clinics and to provide a roadmap and regional supports to assist schools in coordinating state and local wraparound services and supports to remove non-academic barriers to learning, including funding for a state-level wraparound supports coordinator. GaDOE will expand access to the Mental Health Awareness Training and related training so educators understand the signs and signals of students dealing with suicidal thoughts, abuse, neglect, and/or trauma and understand how to properly connect these students to services and supports.

G. Monitoring and Measuring Progress

The Department recognizes that transparency on how ARP ESSER funds are used and their impact on the Nation’s education system is a fundamental responsibility of Federal, State, and local government. In this section, SEAs will describe how they are building capacity at the SEA and LEA levels to ensure high-quality data collection and reporting and to safeguard funds for their intended purposes.

1. Capacity for Data Collection and Reporting: It is important for an SEA to continuously monitor progress and make adjustments to its strategies, as well as to support its LEAs in making adjustments to LEA strategies, based on impact. Describe how the SEA will ensure its capacity and the capacity of its LEAs to collect data on reporting requirements, including but not limited to the examples of reporting requirements described in the SEA’s Grant Award Notification (listed in Appendix B). Describe the SEA’s capacity and strategy to collect data from its LEAs (disaggregated by student group, where applicable), to the greatest extent practicable, including any steps the SEA will take to build its capacity in the future (which may include the use of ARP ESSER and other Federal COVID-19 pandemic funds at the SEA and LEA levels), on issues that may include the following:
   i. Student learning, including the academic impact of lost instructional time during the COVID-19 pandemic;
ii. Opportunity to learn measures (e.g., chronic absenteeism; student engagement; use of exclusionary discipline; access to and participation in advanced coursework; access to technology, including educator access to professional development on the effective use of technology; access to high-quality educators; access to school counselors, social workers, nurses, and school psychologists; and results from student, parent, and/or educator surveys);

iii. Fiscal data that is comparable across the State (e.g., per-pupil expenditures at the LEA and school levels);

iv. Jobs created and retained (by position type);

v. Participation in programs funded by ARP ESSER resources (e.g., summer and afterschool programs); and

vi. Other reporting requirements reasonably required by the Secretary (please refer to Appendix B of this template; final requirements will be issued separately).

Capacity for Data Collection and Reporting

GaDOE’s Data Collections, Analysis, and Reporting department collects and maintains education records on Georgia school districts, students and staff in response to state and federal laws and state board rule requirements including program monitoring and for audit purposes. O.C.G.A. 20-2-664 requires the GaDOE to create, publish, and make publicly available a dictionary of data elements with definitions of student personally identifiable data fields.

Before adding new data elements to the collection effort, the following procedures must be followed in compliance to OCGA §20-2-664.

Notify the Governor and the General Assembly of the following:

- New proposed data element
- Changes to existing student personally identifiable data collection required for any reason, including changes to federal reporting requirements made by the United States Department of Education
- Announce new provisional student data collection to the general public for a review and comment period for at least 60 days

The agency will continue to follow the internal procedures to collect the data expressed in G.1.i-iv. as required for submission to the U.S. Department of Education in collaboration with the Offices and Divisions of Finance and Business Operations; Assessment and Accountability; School Improvement; Technology Services, Federal Programs; Office of School Safety and Climate; Policy, Flexibility, and External Affairs; and Career, Technical, Agricultural Education.

2. Monitoring and Internal Controls: Describe how the SEA will implement appropriate fiscal monitoring of and internal controls for the ARP ESSER funds (e.g., by updating the SEA’s plan for monitoring funds and internal controls under the CARES and CRRSA Acts; addressing potential sources of waste, fraud, and abuse; conducting random audits; or other tools). In this response, please describe the SEA’s current capacity to monitor ARP ESSER; steps, if needed, to increase capacity; and any foreseeable gaps in capacity, including how the SEA will provide its LEAs with technical assistance in the anticipated areas of greatest need.
Internal Controls

GaDOE’s Director of External Affairs serves as the Project Director for the ESSER Fund grants. A former Federal Programs Specialist was subsequently hired to manage the grant and ensure fidelity of the grant. This position has been responsible for creating guidance documents, providing technical assistance, coordinating budget submission and approval, and subrecipient monitoring activities. The GaDOE contracted with two retired LEA employees with extensive Federal Programs knowledge to assist the manager with budget approvals, technical assistance, and subrecipient monitoring. Two additional full-time staff ESSER-funded staff members will join the SEA team to provide additional help with budget approvals, technical assistance, and subrecipient monitoring.

Additionally, the state Ombudsman has coordinated with the ESSER Fund grant staff to support the provision of equitable services to private schools under the CARES Act. The ESSER Fund grant staff collaborates daily with the Division of Federal Programs (ESSA and IDEA) staff to coordinate support for LEAs.

Monitoring

LEAs are monitored on a four-year cycle. Approximately one-fourth of the LEAs are monitored each year. As part of the annual review process in determining which LEAs are to be monitored, the Division of Federal Programs conducts a risk assessment using a combination of elements defined by GaDOE. An LEA’s risk assessment rating is determined by using both its risk rating, based on a set of established High-Risk Elements developed by the Division of Federal Programs and a risk rating from GaDOE’s Financial Review Division.

During the summer of each year, the Division of Federal Programs completes a risk assessment to determine if an LEA falls into the high-risk category. The results of the risk assessment determine which LEAs may be added to the regular CFM cycle for that year. The SEA has the responsibility to monitor high-risk LEAs (§ 200.331(b)(1-4)). The Division of Federal Programs defines high-risk as:

- LEAs showing evidence of serious or chronic compliance problems
- LEAs with financial monitoring/audit findings; and/or LEAs with a high number of complaints from parents and other stakeholders about program implementation.
- Other elements that may cause an LEA to be determined high-risk include size of allocation and new federal programs for fiscal management personnel in the LEA.
- High-risk does not necessarily mean an LEA is not meeting the requirements of the program, federal regulations, or administrative procedures. It does mean that an LEA may be at a higher risk of having program elements that could cause it to not meet requirements associated with federal rules, regulations, and administrative procedures.