State Plan for the
American Rescue Plan Elementary and Secondary School Emergency Relief Fund

U.S. Department of Education

Issued: April 21, 2021

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Paperwork Burden Statement According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this information collection is 1810-0754. Public reporting burden for this collection of information is estimated to average 100 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The obligation to respond to this collection is required to obtain or retain benefit under Section 2001 of the American Rescue Plan Act of 2021 (ARP Act). If you have any comments concerning the accuracy of the time estimate, suggestions for improving this individual collection, or if you have comments or concerns regarding the status of your individual form, application or survey, please contact Britt Jung, Office of State and Grantee Relations, Office of Elementary and Secondary Education, U.S. Department of Education, 400 Maryland Avenue, SW, Washington, DC 20202-6450, email: SGR@ed.gov directly.

Introduction

The American Rescue Plan Elementary and Secondary School Emergency Relief ("ARP ESSER") Fund, authorized under the American Rescue Plan ("ARP") Act of 2021, provides nearly $122 billion to States to support the Nation's schools in safely reopening and sustaining safe operations of schools while meeting the academic, social, emotional, and mental health needs of students resulting from the coronavirus disease 2019 ("COVID-19") pandemic. It is particularly important that ARP ESSER funding will enable States and local educational agencies ("LEAs"), and more directly schools, to support students who have been most severely impacted by the COVID-19 pandemic and are likely to have suffered the most because of longstanding inequities in our communities and schools that have been exacerbated by the COVID-19 pandemic.

The U.S. Department of Education ("Department") is committed to working in partnership with States so that these unprecedented resources are quickly put to work to ensure students have sustained access to in-person instruction and that the resources are used to provide the effective support students need as they persist through and recover from the impacts of the COVID-19 pandemic. The thoughtful and timely use of these funds will have a lasting impact on our Nation's schools and help to address the inequities in resources, services, and opportunities available to our students.

This template presents an opportunity for States to share their plans for the use of ARP ESSER funds with the public. The Department must approve a State educational agency's ("SEA's") plan in order to make the State's remaining ARP ESSER allocation available for use. Please note that the Department intends to issue ARP ESSER reporting requirements separately.

Instructions

Each SEA must provide descriptions and other information that address each requirement listed below. An SEA may use this template or another format as long as every item and element is addressed in the SEA's response. Throughout this document, questions that refer to an SEA's ARP ESSER funding are referencing the total allocation to be received by the SEA, including that which it allocates to its LEAs.

Each SEA must submit to the Department by **June 7, 2021,** either: (1) its ARP ESSER plan or (2) the State requirements that preclude submission of the plan by that date and a date by which it will be able to submit its complete ARP ESSER plan.

To submit the SEA's plan, please email the plan to your Program Officer at [State].OESE@ed.gov (e.g., Alabama.OESE@ed.gov).

In order to ensure transparency, the Department will post each plan on the Department's website when it is received and will indicate each plan's approval status.

This template also allows States to fulfill the requirement of the Coronavirus Response and Relief Supplemental Appropriations ("CRRSA") Act ESSER II 6-month reporting requirement in section 313(f) of the CRRSA Act.

Cover Page

Grantee and Contact Information

ARP ESSER PR Award Number (e.g., S425U2100XX): S425U210044

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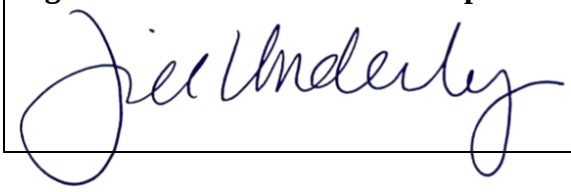
By signing this document, I agree to each of the assurances listed in Appendix C and further assure that: To the best of my knowledge and belief, all information and data included in this plan are true and correct.	
Chief State School Officer or Authorized Representative (Printed Name) Jill Underly	
Signature of Authorized SEA Representative 	Date: 11/1/21

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.

During the 2020-21 school year, Wisconsin districts applied to the Wisconsin Department of Public Instruction for waivers from various state requirements to navigate the pressures of the COVID-19 pandemic. The language from 110 waiver applications was analyzed to identify effective strategies to support the needs of Wisconsin students during the COVID-19 pandemic. To better reflect on the experiences of districts, a survey and interviews were conducted during July of 2021. Districts surveyed and interviewed were from cities, suburbs, towns, and rural communities. There was widespread concern about student engagement. Districts used asynchronous learning time to recalibrate their systems. Below identifies promising practices in three areas: modifying schedules, modifying curriculum, and modifying instructional practices.

- Modify schedules to do the following:
  - include asynchronous learning as instructional time;
  - include competency based learning;
  - and include time for collaboration within and across grade-level and content teams to plan coherent, relevant instruction.
- Modify curriculum to do the following:
  - adapt curriculum to scaffold prerequisite skills in new instruction;
  - add project-based learning;
  - and honor student diversity to ensure each student is successful.
- Modify instructional practices to do the following:
  - move to competency-based grading and reporting systems;
  - create digital repositories to share curricular resources;
  - and transition to using outdoor learning spaces.

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.

The WDPI's assessment of the top two issues currently facing students and schools across the state as a result of the COVID-19 pandemic are instructional planning for the 2021-2022 school year and digital learning and equitable access.

As we quickly approach the beginning of the 2021-2022 school year, there is still much uncertainty, making instructional planning a critical concern for schools and educators. Wisconsin students participate in the statewide summative assessments during March, April, and May. Scoring occurs in June, and data flows from assessment vendors into the agency's data warehouse throughout July and early August. The data warehouse team loads the data and performs quality assurance from late July through August. As of now, the final data is not available, and we anticipate it becoming available in the public portals in late September or October. We are also awaiting final certification of attendance and chronic absenteeism data. This makes engaging in data inquiry processes and accurate identification of and subsequent planning for student academic needs difficult. As shown in the surveys and interviews conducted as a follow-up to the analysis of waivers LEAs submitted to the WDPI during school year 2020-2021, there is currently widespread concern about engaging or re-engaging students in school, which is a key component of instructional planning.

At the same time, Wisconsin has seen an increase in COVID-19 positive test results due to variants, making digital learning and equitable access of concern as schools once again face the prospect of delivering remote or hybrid instruction. In school year 2020-2021, the WDPI collected data on student internet access, device access, and internet performance for the first time. While this data showed that 96.8% of respondents have confirmed internet access, only 40% of enrolled Wisconsin students responded to the survey. Additionally, only 34.5% of respondents confirmed they have access to a personal device. This lack of confirmed internet and device access has serious implications for those LEAs in communities that are seeing large increases in COVID-19 positive test results and are therefore facing the potential for delivering remote or hybrid instruction early in the school year, which could further disengage those students who have been disproportionately impacted by the COVID-19 pandemic.

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).

To the extent possible, this description should include data on indicators such as estimates of the academic impact of lost instructional time,[1] chronic absenteeism, student engagement, and social-emotional well-being.

Complete the table below, adding rows as necessary, or provide a narrative description.

At this time, the SEA is still undergoing data certification for state summative assessments that were administered in spring, 2021. Administering state summative assessments during a global pandemic presented special challenges and a need to more carefully review data before making that data public. In order to identify the highest priority needs of student subgroups, the WDPI relied on past trend data on chronic absenteeism, discipline, and state summative assessment data for the past 5 years or the years this data were available.

Table A1.

Student group	**Highest priority needs**
Students from low-income families	Statewide student data from the 2020-2021 school year show that 362,345 students representing 43.7% of Wisconsin students, are economically disadvantaged. This number represents a 3% increase from school year 2018-2019. Due to the link between academic achievement and economic status, supporting the academic needs of Wisconsin students experiencing poverty is a high priority. Student engagement as defined by chronic absenteeism and rates of out-of-school suspension and expulsion. This group of students has a five year chronic absenteeism

[1] For the purposes of the plan, "academic impact of lost instructional time" refers to "learning loss" experienced by students as a result of the COVID-19 pandemic, as referenced in the ARP Act and the CRRSA Act.

	average of 21%, and in 2019-2020, this group of students had an out-of-school suspension rate of 11.6% compared with an out-of-school suspension rate of 2.2% for non-economically disadvantaged students. English language arts and math proficiency. This group of students has a four year average of proficient or advanced in English language arts of 25.6% compared with 54.9% for non-economically disadvantaged peers, and a four year average of proficient or advanced in math of 25.1% compared with 56.2% for non-economically disadvantaged peers.
Students from each racial or ethnic background used by the State for reporting purposes – please add a row for each racial or ethnic group (e.g., identifying disparities and focusing on underserved student groups by race/ethnicity)	The following shows Wisconsin Third Friday September 2020-21 enrollment data by student demographic data based on total Wisconsin student TFS enrollment: Amer. Indian 8,914 1.10% Student engagement as defined by chronic absenteeism and discipline data. This group of students has a five-year chronic absenteeism average of 26.9%, and in 2019-2020 had an out-of-school suspension rate of 9.8%. English language arts and math proficiency. This group of students has a four-year average of proficient or advanced in English language arts of 23.1% compared with 50% for white peers, and a four year average of proficient or advanced in math of 21.9% compared with 51.3% for white peers. Asian 34,497 4.20% English language arts and math proficiency. This group of students has a four-year average of proficient or advanced in English language arts of 42.7% compared with 50% for white peers, and a four year average of proficient or advanced in math of 45.4% compared with 51.3% for white peers. Black 73,483 8.90% Student engagement as defined by chronic absenteeism and discipline data. This group of students has a five-year chronic absenteeism average of 34.4%, and in 2019-2020 had an out-of-school suspension rate of 30.3%.

	English language arts and math proficiency. This group of students has a four-year average of proficient or advanced in English language arts of 13.5% compared with 50% for white peers, and a four year average of proficient or advanced in math of 11.2% compared with 51.3% for white peers. Hispanic 106,239 12.80% Student engagement as defined by chronic absenteeism data This group of students has a five-year chronic absenteeism average of 17.8%, English language arts and math proficiency. This group of students has a four-year average of proficient or advanced in English language arts of 25.7% compared with 50% for white peers, and a four year average of proficient or advanced in math of 23.8% compared with 51.3% for white peers. Pacific Isle 633 0.10% English language arts and math proficiency. This group of students has a four-year average of proficient or advanced in English language arts of 37.6% compared with 50% for white peers, and a four year average of proficient or advanced in math of 34.9% compared with 51.3% for white peers. White 567,164 68.30% English language arts and math proficiency. While this subgroup of students outperforms all other subgroups in ELA and math achievement as measured by state summative assessments, academic achievement is still a concern. This group of students has a four-year average of proficient or advanced in English language arts of 50%, and a four year average of proficient or advanced in math of 51.3%. Two or more 38,161 4.60% Student engagement as defined by chronic absenteeism and discipline data. This group of students has a five-year chronic absenteeism average of 16.2%, and in 2019-2020 had an out-of-school suspension rate of 10.1%. English language arts and math proficiency. This group of students has a four-year

	average of proficient or advanced in English language arts of 37.9% compared with 50% for white peers, and a four year average of proficient or advanced in math of 36.6% compared with 51.3% for white peers. Unknown 844 0.10% English language arts and math proficiency. This group of students has a four-year average of proficient or advanced in English language arts of 26.1% compared with 50% for white peers, and a four year average of proficient or advanced in math of 26% compared with 51.3% for white peers.
Students by gender – please add a row for each gender (e.g., identifying disparities and focusing on underserved student groups by gender)	The following shows Wisconsin Third Friday September 2020-21 enrollment data by gender based on total Wisconsin student TFS enrollment: Female 402,533 48.5% Math proficiency. Females have a four-year average of proficient or advanced in mathematics of 42.5% compared with 43.7% for their male peers. While they outperform male peers in English language arts proficiency, their four-year average of proficient or advanced of 47.7% is still of concern. Male 427,402 51.5% Student engagement as defined by discipline data. In 2019-2020, male students had an out-of-school suspension rate of 8.3% compared with a rate of 3.9% among their female peers. English language arts proficiency. This group of students has a four-year average of proficient or advanced in English language arts of 37.7% compared with 47.7% for female peers. While males outperform female peers in mathematics, their four-year average of proficient or advanced in math of 43.7% is still a concern.
English learners	The following shows Wisconsin Third Friday September 2020-21 enrollment data by English language learner status based on total Wisconsin student TFS enrollment: Eng Prof 786,044 94.7% Student engagement as defined by discipline data. In 2019-2020, this subgroup of students

	had an out-of-school suspension rate of 6.2% as compared to a rate of 4.6% among EL students. English language arts and math proficiency. While this group of students outperforms English language learners, their four-year average of proficient or advanced in ELA of 44.7% and 45.1% in math, is still of concern. EL 43,796 5.3% English language arts and math proficiency. This group of students has a four-year average of proficient or advanced in English language arts of 11% compared with 44.7% for English proficient peers, and a four year average of proficient or advanced in math of 14.3% compared with 45.1% for English proficient peers. Unknown 95 English language arts and math proficiency. This group of students has a four-year average of proficient or advanced in English language arts of 23.3% compared with 44.7% for English proficient peers, and a four year average of proficient or advanced in math of 22.8% compared with 45.1% for English proficient peers.
Children with disabilities	The following shows Wisconsin Third Friday September 2020-21 enrollment data by learner ability status based on total Wisconsin student TFS enrollment: SwD 117,969 14.2% Student engagement as defined by chronic absenteeism and discipline data. This group of students has a five-year chronic absenteeism average of 21.3%, and in 2019-2020 had an out-of-school suspension rate of 17.3%. English language arts and math proficiency. This group of students has a four-year average of proficient or advanced in English language arts of 12.3% compared with 47.2% for peers without disabilities, and a four-year average of proficient or advanced in math of 14.4% compared with 47.5% for peers without disabilities. SwoD 711,962 85.8% English language arts and math proficiency. While this group of students outperforms

	their peers with IEPs, their four-year average of proficient or advanced in ELA of 47% and math of 47.5% is still of concern. Unknown 4 English language arts and math proficiency. This group of students has a four-year average of proficient or advanced in English language arts of 26.1% compared with 47% for peers without IEPs, and a four-year average of proficient or advanced in math of 26% compared with 47.5% for peers without IEPs.
Students experiencing homelessness	At this time, Wisconsin does not have 2020-21 enrollment data for students experiencing homelessness because this data has not yet been certified However, nationwide we have seen an increase of students experiencing homelessness due to the effects of the pandemic. The last certified data shows that 2.0% of our student population experienced homelessness. English language arts and math proficiency. This group of students has a four-year average of proficient or advanced in English language arts of 13.8% compared with 43.1% for peers with stable housing, and a four year average of proficient or advanced in math of 13.1% compared with 43.6% for peers with stable housing.
Children and youth in foster care	Wisconsin out of home care data is not approved to be published for these purposes. It is only approved for specific uses.
Migratory students	The following shows Wisconsin Third Friday September 2020-21 enrollment data by migrant status based on total Wisconsin student TFS enrollment: Migrant 198 0.0% Student engagement as defined by chronic absenteeism data. This group of students has a five-year chronic absenteeism average of 19.3%. English language arts and math proficiency. This group of students has a four-year average of proficient or advanced in English language arts of 18.9% compared with 42.6% for peers who are not migrants, and a four year average of proficient or advanced in math of 17% compared with 43.1% for

	peers who are not migrants. Not migrant 829,737 100.0% English language arts and math proficiency. While this subgroup of students outperforms their peers who are migrants in ELA and math, their four-year average of proficient or advanced in ELA of 42.6% and of 43.1% in math is still of concern.
Other groups of students identified by the State (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, LGBTQ+ students)	There are several sets of data from 2020-21 that the SEA has not yet certified that we believe will help us further identify students who were underserved in 2020-2021. Those data include: state summative assessment data and student attendance and chronic absenteeism data. English language arts and math proficiency. This group of students has a two-year average of proficient or advanced in English language arts of 15.1% compared with 41.8% for peers who do not receive out of home care, and a four-year average of proficient or advanced in math of 16% compared with 43.8% for peers who do not receive out of home care.

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.

The SEA supports LEAs in identifying their greatest needs, groups most at risk, and to guide instructional and social and emotional learning with technical assistance and resources. The SEA's greatest resource to accomplish this is the Wisconsin Information System for Education (WISE), which consists of multiple tools that support person ID generation and data collection to meet all required district and school state and federal reporting mandates. WISEdata is one of the tools in the WISE suite. It is a multi-vendor, open data collection system that allows school districts, charter schools, and private schools participating in a parental Choice program to submit high quality data to the Wisconsin Department of Public Instruction (WDPI) from the student information system (SIS) vendor of the educational agency's choice. State and federally required data is automatically pushed from student information systems to the SEA. Agencies across the state also have the ability to opt in to send other data elements to WISEdata in order to automate data transfer to other educational tools and software that they use to provide instruction to their students. Examples include academic and career planning tools, retrieving immunization status from the state health department, and integrating class roster information into third party

tools. WISEdash provides multi-year education data about Wisconsin schools in a visually appealing reporting tool. The WISEdash Public Portal is used by districts, schools, parents, researchers, media, and other community members to view data published by DPI. WISEdash for Districts is a secure reporting tool that is used by districts and schools to view their own data submitted via WISEdata for data quality, continuous improvement planning and early warning systems. The data and dashboards provided through WISEdash helps all stakeholders better understand education outcomes for Wisconsin students, inform decisions that can help ensure every child has access to the programs and supports they need, and meet federal, state and local reporting requirements. The data available in WISEdash includes data submitted from school districts via WISEdata on student demographics, programs and outcomes as well as additional data sources from assessment vendors (local by district opt in and statewide), student growth, FAFSA completion, and postsecondary. WISEdash also reports on many opportunities to learn measures, including several different early warning systems, exclusionary discipline, roster course data, and new this year, data on digital equity.

WDPI is currently processing the 2020-21 statewide assessments that were administered so school districts can use this information to address the impact of lost instructional time during the pandemic. This information will first be loaded to WISEdash for Districts where LEAs can securely access the data for their students and plan for the 2021-22 school year with the data. Later in the fall, WDPI will publish the data to its WISEdash Public Portal dashboard where any stakeholder can further review the data to analyze lost instructional time impacts. In addition, WDPI recently created dedicated visuals to show assessment participation so that the 2020-21 assessment results can be analyzed in context.

WISExplore is a data inquiry process developed and supported by regional service providers in collaboration with SEA staff to support LEAs in effectively analyzing their data and using it to engage in district and school improvement efforts. WISExplore consists of common data inquiry process that teachers and school leaders statewide can use to guide their improvement planning efforts. The Data Inquiry Journal is embedded within WISEdash for Districts. This is the template that WISExplore has developed to be used by districts for school improvement planning and each regional service provider has staff that assist LEAs in using the tool and process. The data inquiry journal allows educators to document ongoing data investigation and design continuous improvement plans all in one convenient location. This interactive tool, designed by Wisconsin educators, imports local data for analysis within a secure platform to protect student privacy. It includes all the essential components for continuous improvement, meeting requirements for continuous improvement planning in ESEA and IDEA by supporting LEA teams as they engage in critical conversations about local data to address gaps and promote equitable outcomes for each learner. This tool contains three parts: a student data inquiry component, a practice inquiry component, and a summary and improvement plan. Together, these three parts lead educator teams through a research-based process of data inquiry and improvement planning. The data inquiry journal automatically uploads and integrates data pictures to document progress over time and includes options to export data for further internal use and required state reporting. In addition, to support LEAs in meeting the needs of students with IEPs, WDPI also has resources on progress monitoring of IEP goals.

The connection between students' social and emotional well-being and academic achievement is well established (Durlak et al., 2011. Aspen Institute, 2018). The WDPI recognizes the need to support educators in establishing safe and supportive learning environments, providing universal social and emotional supports, and identifying students at risk

for more significant mental health challenges in addition to identifying students' academic needs. The DPI will encourage LEAs to analyze multiple sources of data to identify 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, by providing guidance and consultation to schools and districts to identify reliable and culturally focused measures of student well-being and academic achievement.

The agency will also provide access to the Youth Risk Behavior Survey which will provide youth perspective and allow for the data to be disaggregated across groups in order to identify student groups most at risk for social and emotional challenges and learning loss. Additional local data sources the SEA will encourage LEAs to utilize include county YRBS data, County Health Rankings and Social Determinants of Health, local parent and student surveys, youth and family focus groups, academic assessment data, and data provided by community partners (e.g., out-of-school time providers).

Recognizing the role that race and disability status plays in predicting student achievement outcomes, the WDPI also offers LEAs the Culturally Responsive Problem Solving module and guide.

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.

The WDPI has not been required to collect student level data for all public schools on mode of instruction before now (limited, specific data was collected for P-EBT and legislative reporting purposes). The WDPI understands the importance of having instructional mode (learning modality) data for Wisconsin's students and schools moving forward. We are currently planning to implement this new data collection through WISEdata via the Ed-Fi API in a future school year, by the 2023-24 school years. Implementing the new data collection with fidelity, including clear definitions and use cases, will take time to propose and come to consensus within the Wisconsin education community.

When we integrate the collection into WISEdata, it will be implemented alongside the student group data that is already collected today. In addition, the WISEdash data dashboard has functionality where districts can identify groups of students based on criteria the district determines so that they can then review data just for those students as they move through the dashboards. Examples of data topics available include Enrollment, Attendance, and Assessment data amongst many others. When instructional mode data is added to the dashboards, the data will be available to review for those students and schools as well. This existing functionality will be able to be utilized so that LEAs can review the students who were disproportionately impacted by the pandemic.

In terms of the technical solution, Ed-Fi is proposing three different methods of collection:

1. Program-Calendar method which collects specific scheduled cohorts and their learning modality and length of time in that modality per day (useful if districts have to split their school into half of the students being on campus part of the week and the other half being on campus another part of the week). This is the most granular method of collection.
2. Program-Aggregate method is similar to Program-Calendar except that the detail regarding which day a hybrid cohort is remote or campus is lost. Instead, a percentage of time or time per week is collected to represent how much time the cohort was in the specific mode of learning.
3. Attendance Method is the third proposed option. It requires the collection of positive attendance, which many Wisconsin LEAs do not currently collect. In addition, it requires the collection of daily attendance. Many LEAs collect daily attendance, but daily attendance is not currently submitted to WDPI today. WDPI may begin doing so in relation to modernizing the collection of finance related student data.

Each of these methods of collection will need to be evaluated in terms of how they fit into the needs of the WDPI uses of the data, how seamless it is for LEAs to collect and enter the data, and how much effort is required for student information system (SIS) vendors to both make changes to collect the data and to make changes to submit the data to WISEdata via the Ed-Fi API.

Once the data is collected, the WDPI will also sync it nightly with WISEdash and present the data back to districts in a secure manner in WISEdash for districts. As required by ARP, we will also publicly report the information in the WISEdash Public Portal.

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.

The WDPI has not been required to collect data on mode of instruction before now and does not yet have this data available. When this data has been certified, the WDPI will make it publicly available on its website.

Moving forward, Ed-Fi is proposing three different methods of collection:

1. Program-Calendar method which collects specific scheduled cohorts and their learning modality and length of time in that modality per day (useful if districts have to split their school into half of the students being on campus part of the week and the other half being on campus another part of the week). This is the most granular method of collection.
2. Program-Aggregate method is similar to Program-Calendar except that the detail regarding which day a hybrid cohort is remote, or campus is lost. Instead, a percentage of time or time per week is collected to represent how much time the cohort was in the specific mode of learning.
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Once the data is collected, the WDPI will also sync it nightly with WISEdash and present the data back to districts in a secure manner in WISEdash for districts. As required by ARP, we will also publicly report the information in the WISEdash Public Portal.

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.

The decision about planned operations status and mode of instruction is made at the local level by each LEA.

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;

Supporting LEAs in safely returning to in-person instruction and sustaining the safe operation of schools is of critical importance to the Wisconsin Department of Public Instruction, especially as new coronavirus variants develop. As a local control state, each LEA has the authority to make its own decision about whether and how to return to in-person instruction. To support LEAs in their decision-making and planning for safe operations of schools, the WDPI created 12 guidance documents that are shared with LEAs as a technical assistance resource. The WDPI State School Nurse Consultant has collaborated with the Wisconsin Department of Health Services (DHS) in developing these materials that align with the most up-to-date guidance from the Centers for Disease Control and Prevention (CDC). Documents are revised as new recommendations are made. Documents and tools provide LEAs with templates and recommendations for their district plans. Documents include a school health services toolkit and the recently updated "COVID-19 Infection Control and Mitigation Measures" document with information on:

- Universal and correct wearing of masks
- Physical distancing
- Cleaning and maintaining healthy facilities, including improving ventilation
- Handwashing and respiratory etiquette
- Transportation
- Food service

The WDPI has consulted with the DHS on development of guidance by DHS for local and tribal health departments and schools on contact tracing and the isolation and quarantining of staff and students. This guidance has been updated to incorporate the vaccination of staff and students. The WDPI is collaborating with DHS on a statewide COVID testing program. Some statewide testing is currently being offered with a full program to begin September 1, 2021.

The WDPI supports schools hosting school-located vaccination clinics for staff, students and the community. Guidance documents along with references to CDC guidance are provided to LEAs. Efforts to promote vaccination among students and staff will continue as younger children become eligible for vaccination fall and winter of 2021.

The state school nurse consultant communicates with school nurses, school health services personnel, and school administrators on a regular basis via an email list-serve. The WDPI has a designated webpage for COVID-19 School Health Services information (https://dpi.wi.gov/sspw/2019-novel-coronavirus/school-health-services-information). On this webpage is a section providing information specifically related to students with disabilities or chronic medical conditions. The state school nurse consultant hosts virtual meetings with school nurses and attends LEA administrator conferences and meetings to provide up-to-date

recommendations. Additionally, the state school nurse consultant is available by phone or email to discuss particular situations with LEAs, school nurses, and parents.

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;

As a local control state, each LEA has the authority to make its own decision about whether and how to return to in-person instruction. A majority of Wisconsin public school districts provided in-person instruction during all or part of the 2020-2021 school year. Nearly all public-school districts ended the 2020-2021 school year providing in-person instruction as an option. Most public-school districts will start instruction for the 2021-2022 school year on or after September 1, 2021. Therefore, most Wisconsin school districts require guidance for the continuation of operations for the start of the fall and not for a reopening of school facilities and operations.

The extent to which Wisconsin school districts and individual schools choose to implement the infection control and mitigation measures recommended by the Centers for Disease Control and Prevention (CDC), the Wisconsin Department of Health Services (DHS), and the best practice recommendations of the Wisconsin Department of Public Instruction (DPI) is a local decision. Therefore the DPI cannot enforce the implementation of best practices and recommendations. The DPI will not track or monitor what measures are, or are not, being implemented in schools, but will instead monitor LEAs for compliance in posting their Safe Return to In-Person Instruction and Continuity of Services plan.

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

The WDPI works closely with the state health agency. The recommendations communicated with LEAs are based upon DHS and CDC guidance. LEAs are instructed to work with the local and tribal health departments to best implement the guidance. It is also recommended that LEAs work with their insurance carriers and legal counsel in determining to what degree the LEA implements mitigation measures.

The state health agency is providing support for both diagnostic and screening testing to schools with funds awarded by the CDC. The DPI has been advising the DHS on this project and providing connections and communications to LEAs. The testing programs were greatly expanded for the fall 2021-2022 school year.

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

The SEA offers various technical assistance resources for safely reopening schools. The WDPI has a designated webpage for COVID-19 School Health Services information

(https://dpi.wi.gov/sspw/2019-novel-coronavirus/school-health-services-information) and the recently updated "COVID-19 Infection Control and Mitigation Measures" document with information on:

- Universal and correct wearing of masks
- Physical distancing
- Cleaning and maintaining healthy facilities, including improving ventilation
- Handwashing and respiratory etiquette
- Transportation
- Foodservice

Also on this webpage is a section providing information specifically related to students with disabilities or chronic medical conditions.

The state school nurse consultant communicates with school nurses, school health services personnel, and school administrators on a regular basis via an email list-serve. The state school nurse consultant also hosts virtual meetings with school nurses and attends LEA administrator conferences and meetings to provide up-to-date recommendations. Additionally, the state school nurse consultant is available by phone or email to discuss particular situations with LEAs, school nurses, and parents. The WDPI will continue to develop and revise the guidance documents as necessary and as they remain relevant. The WDPI COVID-19 School Health Services webpage was streamlined. The WDPI will provide a New School Nurse Orientation virtually on October 21-22, 2021, including COVID topics. The state school nurse consultant will send bi-weekly newsletters and emails as needed. The state school nurse consultant is scheduled to present at various school administration conferences and meetings along with school nurse network virtual meetings. The SEA will support the continuation of statewide webinars held in conjunction with the state Department of Health Services.

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(i) 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),[2] 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.

The WDPI will use its in-house federal grants management system, WISEgrants, to monitor and ensure each LEA's compliance with 2001(i) of the ARP Act.

As part of the ARP ESSER application process in WISEgrants, LEAs will be required to complete the following in order to submit the ARP ESSER application. An LEA must:

- Include their website's url where they post their Safe Return to In-Person Instruction and Continuity of Services Plan;
- Describe their LEA's level of stakeholder engagement for their Safe Return to In-Person Instruction and Continuity of Services Plan and their ARP ESSER Plan for funding;
- Describe how well their safety policies align with the CDC, state, and/or local health department guidelines for each safety requirement listed the interim final rule;
- Describe their continuity of services including but not limited to services to address students; academic needs and students' and staff social, emotional, mental health, and other needs, which may include student health and food services; and
- Identify the date the plan was put into place.

The WDPI will use some of its ARP-ESSER administrative funds to hire staff to review the extent to which each LEA's safety policies align with CDC, state, and/or local health department guidelines and will provide support and technical assistance as appropriate. Additionally, WDPI will program its federal grant management system to require LEAs to review and, as necessary, update their plan every six months. If an LEA does not review their

[2] ARP ESSER funds are subject to the Tydings amendment in section 421(b) of the General Education Provisions Act, 20 U.S.C. 1225(b), and are therefore available to SEAs and LEAs for obligation through September 30, 2024. Review and revisions of these plans, if necessary, are not required during the Tydings period.

plan, WDPI will temporarily withhold the payment of claims until the plan is reviewed (as allowed under 2 CFR 200.339(a)).

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.

Knowing that state law required the WDPI to submit its initial draft plan for use of the ESSER III SEA set-aside to Wisconsin's Joint Committee on Finance, and knowing that based on recent, past experiences, the SEA plan would be significantly revised by said legislative committee, the WDPI made the decision to create an initial draft that would provide LEAs with the greatest control over ESSER III funds and to funnel those ESSER III funds to the LEAs likely impacted the most by the COVID-19 pandemic, those being LEAs with the greatest numbers of students experiencing poverty. The WDPI did conduct stakeholder engagement with professional organizations representing educators and administrators in the creation of the initial state plan. Those representatives were a racially diverse group of people who also represented the interests of both historically marginalized and non historically marginalized student populations, including students of color and students with IEPs. The feedback from these stakeholders was to allocate the majority of funds directly to LEAs with a formula allowing for more funds being allocated to communities with greater populations of students who were

disproportionately impacted by the COVID-19 pandemic – namely students experiencing poverty, students of color, and students with IEPs. This initial state plan allocated 5% of the state set-aside to LEAs in the form of formula grants to address the impact of lost instructional time through the implementation of EBIS, with those formula grants being based on the number of students experiencing poverty so that more resources would be channeled to LEAs that needed them the most. State-level data shows a correlation between the greatest number of students experiencing poverty and students of color and students with IEPs, so this formula allocated funds to schools with higher populations of students disproportionately impacted by the COVID-19 pandemic. The initial state plan also provided for a $600,000 minimum aid proposal to ensure equitable access for LEAs to ESSER III funds.

Following state law, the WDPI submitted a draft plan for use of the ESSER III SEA set-aside to Wisconsin's Joint Committee on Finance. That legislative committee revised the plan and prescribed use of the SEA set-aside in the following ways: $15.4 million for competitive grants in two rounds with the first round being for LEAs eligible for sparsity aid to support evidence-based after school programming; $15.4 million for competitive grants in two rounds with the first round being for LEAs eligible for sparsity aid to support evidence-based summer programming; $5 million for prescribed reading initiatives that require the SEA and regional service providers to contract with specific vendors; allocating a total of $2.4 million to specific state schools and one charter school; $1.2 million for administrative costs; and using remaining funds to allocate additional ESSER III funds to those LEAs receiving less than $781 per pupil in Title I part A funds proportionate to the percentage and number of in-person instructional hours those LEAs provided in the 2020-2021 school year. Because these additional funds are coming from the SEA set aside, LEAs will be required to use these funds to support EBIS. Therefore, the SEA sought input from stakeholders regarding the evidence-based after school programming grants and the evidence-based summer programming grants.

To engage in meaningful consultation with stakeholders, WDPI first identified stakeholders and representatives of stakeholder groups with special emphasis on those stakeholders or stakeholder groups representing currently or historically marginalized populations to seek their input. These stakeholder groups included: youth organizations, Wisconsin's five largest urban school districts, districts with the highest percentage of English language learners, districts with the highest percentage of students experiencing homelessness, districts with the highest percentage of migrant students, districts with the highest percentage of students living in poverty, districts with the highest percentage of children who are incarcerated, districts with the highest percentage of children receiving out of home care, the professional organization representing Wisconsin's small, rural districts, the professional organization representing educators focused on providing services to children with special needs, civil rights organizations, including those focused on specific community populations like The Milwaukee Urban League, VOCES, The Hmong Institute, GSAFE, and 100 Black Men of Madison, disability rights organizations, representatives from each of the American Indian tribes in Wisconsin, the Wisconsin PTA affiliate and other local parent groups, unions, charter schools and higher education groups and institutions.

The WDPI then crafted an invitation for identified stakeholders that requested their feedback on Wisconsin's state plan for ESSER III funds. That invitation provided some brief background on ESSER III and the request to join at least one virtual stakeholder meeting with days, times, and details on how to join the meetings. The invitation to school districts and professional organizations specifically stated the goal was to hear from students, teachers,

principals, and other educators and included the request to share the invitation, accordingly, to ensure input from a variety of perspectives.

The SEA scheduled ten virtual stakeholder meetings at various times of day over the course of two weeks and facilitated dialogue about ESSER III funds, seeking input on both uses of the SEA set aside (to the extent allowable given the prescribed uses of the SEA set aside as outlined in Wisconsin Motion 57) and how the SEA could better support LEAs in their planning and use of ESSER III funds. For those stakeholders unable to attend or participate in the live sessions, the SEA created and distributed a survey seeking input and posted a pre-recorded webinar on the SEA site along with the survey seeking input.

The following is a review of the stakeholder input received and how the WDPI has applied that input. Strong themes emerged from both the live, facilitated sessions and in the written feedback submitted. These themes centered on specific allowable activities for the two different types of competitive grants the SEA must support with ESSER III set aside funds, and supports that LEAs identified the SEA could provide for their own planning and use of local ESSER III funds.

Wisconsin stakeholders voiced strong support for both the after-school programming and summer programming SEA competitive grants to allow for transportation costs to encourage student attendance and participation, teacher incentives for staffing these programs, and snacks for students. Wisconsin youth specifically asked for programming that supported their academic needs, their mental health needs, and programs that focused on meaningful summer internships or work experiences where they could gain critical employment skills. Additional feedback included the need for the SEA to provide models or examples of effective, evidence-based after school and summer programs.

The WDPI consistently heard and received requests for specific LEA supports, such as guidance for the creation of local plans for the safe return to in-person instruction and continuity of services, and templates for conducting local stakeholder engagement. The SEA will incorporate this stakeholder engagement into the design of the competitive grants for evidence-based after school and summer programming. The WDPI has already begun to create resources stakeholders requested to support their local efforts to create local plans, including a site with updated information about CDC guidelines and recommendations for safe return to in-person instruction and a template for conducting local stakeholder engagement. The WDPI has also connected with regional service providers about these LEA needs and provided them with resources to support their work with local LEAs in these same areas.

As of October, the SEA has created, provided access to, and publicized the following resources in response to stakeholder engagement: A template for the Safe Return to In-Person Instruction and Continuity of Services plan, an editable slide deck for local stakeholder engagement sessions and accompanying resources and suggestions for reaching historically and currently marginalized community members, and a list of recommended EBIS along with sources for identifying EBIS aligned with local student needs. The SEA plans to incorporate stakeholder feedback into the design and allowable costs of the competitive grants for evidence-based after school and summer programming as required by Wisconsin Motion 57.

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);

The WDPI is committed to coordinating Federal COVID-19 pandemic funding and other Federal funding in order to support LEAs in a safe return to and to safely maximize in-person instruction while addressing the disproportionate impact of COVID-19 on currently and historically marginalized populations. In order to accomplish this, the SEA formed a cross agency work group to plan for and coordinate Federal funding and create recommendations and guidance for local LEA use of these funds. Table C1 below shows the services that the SEA coordinated to support with Federal COVID-19 pandemic funding. Tables C2 through C4 show the amount of Federal COVID-19 pandemic funding that has been budgeted and claimed as of August 1, 2021.

In addition to the services the WDPI provided with Federal COVID-19 pandemic funding, the SEA provides tools and resources to support LEAs in identifying the populations most at risk in their local communities. Across the state and nationally, preliminary data suggests that students who entered the pandemic with disproportionate outcomes showed the greatest risk for learning loss and mental health challenges.

WDPI recognizes that an equitable multi-level system of support that provides equitable services, practices, and resources to every learner based upon responsiveness to effective instruction and intervention is best for all students. This includes providing varying types of supports at differing levels of intensity to proactively and responsively adjust to the needs of the whole child. A great deal of focus has been placed on providing guidance and resources for schools to provide comprehensive universal supports in order to create safe and supportive environments in which students feel connected to adults and one another while being engaged with grade-level, standards-aligned instruction. This will continue. Additionally, DPI has worked to provide technical assistance to schools to identify tier 2 and tier 3 supports for their students most at risk.

Highlights of how the SEA has used Federal COVID-19 pandemic funding to address the disproportionate impact of the pandemic include: Building capacity for, and expanding access to high-quality, online instructional resources; providing training for educators in the provision of online and remote instruction and work with educator preparation programs to prepare educators for delivering instruction in online and remote settings; and expanding and building capacity of school staff to provide mental health services, to better support students.

Table C1.

Prior/Current and Planned SEA and LEA Uses of Federal COVID-19 Federal Funds

Funding source	Prior/current SEA and LEA uses (including funding amounts, if applicable)	Planned SEA and LEA uses (including funding amounts, if applicable)
ESSER I (CARES Act)	*ESSER I Set-Aside Projects:* ● Teleservice $47,130 ● Universal Design for Learning Forward! $106,476 ● Institute for Personalized Learning $374,273 ● Broadband Discount Program $22,050 ● Assistive Technology Forward! $115,253 ● Digital Learning Bridge $882,415 ● Mental Health Training & Resources $746,884 ● Reading Foundations Webinars $45,707 ● WI Digital Learning Collaborative Scale-Up $3,478,057 ● Mental Health Literacy Units $1,887 ● Personal Protective Equipment Videos $20,000 *ESSER I Grants **Claimed** by LEAs:* See table C2 below	*ESSER I Set-Aside Projects:* ● Teleservice $52,870 ● Universal Design for Learning Forward! $93,524 ● Institute for Personalized Learning $2,525,727 ● Broadband Discount Program $22,050 ● Assistive Technology Forward! $124,747 ● Digital Learning Bridge $1,117,585 ● Mental Health Training and Resources $2,744,496 ● Reading Foundations Webinars $52,293 ● WI Digital Learning Collaborative Scale-Up $3,271,943 ● Mental Health Literacy Units $38,113 *ESSER I Grants **Budgeted** by LEAs (included claimed amounts):* See table C2 below
GEER I (CARES Act)	*All funding was provided in grants to LEAs* *GEER Grants **Claimed** by LEAs:* See table C3 below	*All funding was provided in grants to LEAs* *GEER Grants **Budgeted** by LEAs (included claimed amounts):* See table C3 below
ESSER II (CRRSA Act)	*All funding was provided in grants to LEAs* *ESSER II Grants **Claimed** by LEAs:* See table C3 below	*All funding was provided in grants to LEAs* *ESSER II Grants **Budgeted** by LEAs (included claimed amounts):* See table C3 below
GEER II (CRRSA Act)	*N/A The Governor issued these funds to IHEs only.*	*N/A The Governor issued these funds to IHEs only.*

Table C2.

ESSER I Grants Claimed and Budgeted as of 8/1/21

Program Type	Total Budgeted (Approved Budgets Only)	Total Public Budgeted Amount	Total Public Amount Claimed (Prior to 6.30.2021)	Total Private Budgeted Amount (for equitable participation for private school students)
Addressing Afterschool and Summer Learning	$2,221,339.81	$285,193.13	$169,598.89	$1,936,146.68
Addressing Long-term School Closure	$29,700,161.63	$27,887,041.13	$18,693,396.16	$1,813,120.50
Continued Staff Employment	$1,245,684.74	$1,245,684.74	$1,199,496.96	$ -
Educational Technology	$62,795,829.29	$56,802,395.36	$49,433,267.38	$5,993,433.93
Mental Health Services and Supports	$2,244,810.79	$674,562.06	$555,301.19	$1,570,248.73
Indirect	$5,223,871.79	$5,100,934.59	$3,159,472.28	$122,937.20
Outreach/Service Delivery to Special Populations	$4,638,333.17	$3,543,811.23	$300,903.44	$1,094,521.94
Preparedness and Response to COVID-19	$46,843,466.11	$40,303,675.04	$29,224,824.99	$6,539,791.07
Total ESSER I Amount Not Budgeted as of 8.1.2021	$3,630,819.67			

Total ESSER I Private Amount Claimed for Equitable participation for private school students (Prior to 6.30.2021) = $ 5,492,073.34 The Total Private Claimed Amounts are not available by Program Type.)

Table C3.

GEER I Grants Claimed and Budgeted as of 8/1/21

Total amount awarded to LEAs = $46,550,410

Program Type	Total Budgeted (Approved Budgets Only)	Total Public Budgeted Amount	Total Public Amount Claimed (Prior to 6.30.2021)	Total Private Budgeted Amount (for equitable participation for private school students)
Addressing Long-term School Closure	$9,002,199.54	$7,933,542.18	$4,448,923.52	$1,068,657.36
Educational Technology	$12,708,190.94	$11,216,822.44	$7,338,098.42	$1,491,368.50
Mental Health Services and Supports	$60,716.59	$60,716.59	$8,222.14	$ -
Indirect	$1,003,903.36	$966,717.69	$29,148.63	$37,185.67
Outreach/Service Delivery to Special Populations	$214,942.42	$214,942.42	$46,830.83	$ -
Preparedness and Response to COVID-19	$15,417,441.71	$14,132,454.56	$3,645,031.14	$1,284,987.15
Total GEER Amount Not Budgeted as of 8.1.2021	$8,143,015.44			

Total GEER Private Amount Claimed for Equitable participation for private school students (Prior to 6.30.2021) = $379,890.04. The Total Claimed Private Amounts are not available by Program Type.

Table C4

ESSER II Grants Claimed and Budgeted as of 8/1/21

Program Type	Total Budgeted (Approved Budgets Only)	Total Public Budgeted Amount	Total Public Amount Claimed (Prior to 6.30.2021)
Addressing Afterschool and Summer Learning	$2,633,393.71	$2,633,393.71	$345,535.43
Addressing Long-term School Closure	$27,593,944.27	$27,593,944.27	$8,500,297.56
Educational Technology	$14,277,554.51	$14,277,554.51	$4,652,625.70
Mental Health Services and Supports	$1,019,948.12	$1,019,948.12	$125,231.42
None	$1,222,843.21	$1,222,843.21	$139,505.16
Outreach/Service Delivery to Special Populations	$3,047,491.20	$3,047,491.20	$490,327.26
Preparedness and Response to COVID-19	$25,585,322.32	$25,585,322.32	$6,663,595.89
Total ESSER II Amount Not Budgeted as of 8.1.2021	$542,910,948.66		

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.

The WDPI has awarded all of the funds for ESSER I and ESSER II. Tables C2 through C4 above show the amount of Federal COVID-19 pandemic funding that has been budgeted and claimed by LEAs as of August 1, 2021.The WDPI does not track LEA obligations. Depending on the cost, funds are obligated at different points in time per 34 CFR 76.707, therefore reporting obligations can be misleading as it does not provide a complete picture of how LEAs are planning to spend their funds. For example, on August 1, 2021, an LEA budgets $300,000 of ARP ESSER funds for a reading teacher's salary and fringe benefits to provide evidence-based reading interventions to struggling readers throughout the LEA for the life of the grant (through September 30, 2024). The obligation is not made until the teacher does the work. Therefore, the $300,000 would not be fully obligated until 2024.

Furthermore, reporting obligations would substantially increase the administrative burden on LEAs as well as the SEA. Wisconsin uses a GAAP modified accrual accounting standard under which LEAs record expenditures, which do not have the same definition as obligations. Recording and reporting obligations would require LEAs to develop and maintain parallel accounting systems that reconcile the difference between obligations and expenditures, and the WDPI to develop and maintain a parallel data collection system for the sole purpose of reporting ESSER obligations. This would require time, funding, and capacity for both LEAs and the SEA and be especially burdensome with the 2021-22 fiscal year underway.

As an alternative, the WDPI can use the WISEgrants federal grants management system to report on the amount of funds that are budgeted as demonstrated in tables C2 through C4 above.

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.[3]

[3] 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.

The WDPI has been and will continue to utilize additional Federal funding sources to 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 with special attention to providing supports to those students who have been and continue to be disproportionately impacted.

Beyond CARES Act funds, WDPI's Student Services/Prevention and Wellness Team has a variety of federal funding sources that support academic, social, emotional and mental health needs of students resulting from the pandemic. Federal funding sources support a significant amount of staffing on the Student Services Prevention and Wellness team. Funded staff facilitate access to free training, community of practice, guidance documents, and access to training and guidance on evidence based programs and practices, including support for the Wisconsin Safe and Healthy Schools (WISH) Center, School Climate Transformation Grants, the Federal School-Based Mental Health Professionals Grant project, and the Nita M. Lowey 21st Century Community Learning Center (21st CCLC) grant program that supports academically-focused out-of-school time programs. Wisconsin also received funding through the state biennial budget process to support the mental emotional health of students and staff.

The WDPI's IDEA-funded Special Education Team has developed numerous resources to support the needs of LEAs as a result of the COVID-19 pandemic, including, but not limited to:

- Additional Services Bulletin 20.01: Question and Answer Document on addressing the impact on FAPE due to the school closure order; including information on identifying student needs, gathering information to measure progress, and planning for re-entry.
- COVID-19 Special Education Question and Answer Document: Section B provides information for determining compensatory/recovery services due to the COVID-19 impact on FAPE for the 2020-21 school year, and Section M provides information on questions related to returning to school.
- A Guide to Implementing IEPs and Monitoring Progress of IEP Goals When Moving Between In-Person, Hybrid, or Virtual Learning Environments for Individualized Education Program (IEP) Teams

In addition to developing these resources to address pandemic-related needs, the SEA has shifted IDEA discretionary projects to focus on addressing the disproportionate impact the COVID-19 pandemic has had on currently and historically marginalized students and providing technical assistance in ways that maintain the health and safety of facilitators and participants. Project deliverables shifted to address heightened access inequities, addressing the unique needs of districts as they navigate how to best support the students with IEPs and their families as they return to school, address learning loss and equitable access, attend to mental health needs and many other areas of concern that arose during the pandemic.

The WDPI's Title III-funded Multilingual, Multicultural Team has also developed resources to support the needs of LEAs to provide continuity of learning to English

learners as a result of the COVID-19 pandemic, including, but not limited to technical assistance and resources on the topic of supporting English Learners during COVID-19 and COVID-19 guidance for supporting English Learners aligned to Wisconsin's EL Policy Handbook.

The WDPI is currently working on its plan to support students experiencing homelessness with the additional ARP HCY funds. This plan includes supporting LEAs with additional technical assistance, expanded access to summer programming, competitive grants, and identifying best practices for supporting this specific student population. WI DPI is developing an infrastructure to maintain collaboration throughout the planning and implementation of ARP Homeless and ARP ESSER funds to ensure supplemental services are provided to students experiencing homelessness. At the SEA, ARP Homeless funds will not replace ARP ESSER funds, as these are all earmarked to go out to LEAs through a combination of formula grants and competitive grants. Additionally, technical assistance will be provided to all LEAs on how to ensure ARP Homeless funds are used to supplement, not replace, funding to support students experiencing homelessness (e.g., Title I-A, EHCY, ESSER funds) through methods such as webinars, frequently asked questions documents, information on the WI DPI EHCY website, and reminders in the WI DPI EHCY bi-monthly eBrief.

The WDPI's Community Nutrition Team created resources and technical assistance specific to COVID-19 pandemic needs and the Child and Adult Care Food Program. These resources include information and assistance in applying for waivers in the areas of meal service time flexibility, off-site meals, and allowing for the pick-up of meals.

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

Following state law, the WDPI submitted a draft plan for use of the ESSER III SEA set-aside to Wisconsin's Joint Committee on Finance. That legislative committee revised the plan and prescribed use of the SEA set-aside with Motion #57 in the following ways: $15.4 million for competitive grants in two rounds with the first round being for LEAs eligible for sparsity aid to support evidence-based after school programming; $15.4 million for competitive grants in two rounds with the first round being for LEAs eligible for sparsity aid to support evidence-based summer programming; $5 million for prescribed reading initiatives that require the SEA and regional service providers to contract with specific vendors; allocating a total of $2.4 million to specific state schools and one charter school; reducing funding for administrative costs from the maximum allowed approximately $6.8 million to $1.2 million; and using remaining funds to allocate additional ESSER III funds to those LEAs receiving less than $781 per pupil in Title I part A funds proportionate to the percentage and number of in-person instructional hours those LEAs provided in the 2020-2021 school year. The $1.2 million for administrative costs come from the 10% of Wisconsin ARP funds not directed to LEAs and not reserved for learning loss, after-school programming, or summer programming. Therefore, the evidence-based interventions the WDPI will support are evidence-based after school programming, evidence-based summer programming, and the evidence-based improvement strategies selected at the local level by those LEAs eligible to receive the additional ESSER III allocations in accordance with state rule.

The Department's understanding of Wisconsin's Joint Committee on Finance's (JCF's) Motion 57 is that it directs Wisconsin to limit eligibility for support under the required "learning loss" reservation in section 2001(f)(1) of the ARP to LEAs that provided in-person instruction for at least 50 percent of their total instructional hours during the 2020-2021 school year. The attached spreadsheet shows the impact of this directive by comparing those LEAs who are eligible for additional ARP funds either due to their eligibility for sparsity aid or their in-person instruction hours in school year 2020-2021, with Wisconsin's high-need, high-poverty LEAs. This spreadsheet shows that the impact of Wisconsin Motion 57 excludes significant numbers of underserved students from across the state from receiving additional ARP funds and resources, including students in the state's five largest urban districts (Milwaukee Public Schools, Madison Metropolitan School District, Racine Unified School District, Green Bay Area Public Schools, and Kenosha Unified School District). Together these five districts serve over 30 percent of Wisconsin's

students experiencing poverty and nearly 70 percent of Wisconsin's Black students. As noted in Section A, Wisconsin students experiencing poverty and Black students are the student populations identified as having the greatest academic needs and that Black students are the students who have likely lost the most instructional time, and who therefore are the students most in need of additional resources and support.

Per Wisconsin Motion 57, the $5 million for prescribed reading initiatives that require the SEA and regional service providers to contract with specific vendors, as well as the $2.4 million to specific state schools and one charter school must come from the SEA set-aside. Of the $5 million for reading initiatives, $2.3 million are in the form of professional learning for educators and principals facilitated by specific vendors. The SEA can stipulate that priority be given to educators and principals from high-need, high-poverty LEAs for these professional learning services in order to ensure that educators and principals working in schools that serve students most impacted by the COVID-19 pandemic benefit from these funds. The remaining $2.7 million must be allocated to regional services providers, to a vendor to conduct an audit of reading courses of institutions of higher education (IHEs), and to provide grants to any IHEs desiring to change their reading coursework as a result of their audit. The funds earmarked for specific state schools and one specific charter school come from the state set-aside, but not from the 5% reserved to address learning loss through the implementation of EBIS, therefore these institutions will have local control over the use of these funds, but must use a minimum of 20% of their allocations to address learning loss through the implementation of EBIS.

As a local control state, WDPI will not require any specific evidence-based improvement strategy to be implemented by all LEAs receiving additional ESSER III allocations from the state set-aside. The SEA believes that local schools and communities are in the best position to determine the most appropriate evidence-based programs, frameworks, and strategies to address academic needs, social and emotional learning, and student mental health and wellness. The SEA will provide guidance to LEAs regarding how to evaluate and choose appropriate evidence-based improvement strategies based on student needs. Each LEA will be required to identify the evidence-based improvement strategies that they are implementing with their ESSER III funds. Corresponding LEA budgets will be reviewed for alignment with the EBIS selected.

The SEA plans to evaluate the impact of the EBIS implemented with ESSER III funds, including those implemented with state set-aside funds, through targeted monitoring of those LEAs eligible for and receiving the competitive grants for after school programming, the competitive grants for summer programming, and those LEAs receiving the additional ESSER III funds according to state rule throughout the duration of ARP ESSER III. The WDPI will also review and analyze available data from the statewide longitudinal data system

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 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.

Under the State Legislature's Joint Finance Committee's Motion # 57 an earmark was created for expanding evidence-based summer learning and enrichment opportunities. The committee directed WDPI to use $15.4 million from the ESSER III state set-aside for evidence-based summer programming opportunities that will be awarded as competitive grants. The competitive grant is restricted in the first round to those school districts that were eligible to receive a sparsity aid payment in fiscal year 2021. If funds remain, there will be a second round of the competitive grant available to all districts.

The Department's understanding of Wisconsin's Joint Committee on Finance's (JCF's) Motion 57 is that it directs Wisconsin to limit eligibility for evidence-based summer learning opportunities to LEAs eligible for sparsity aid during the 2020-2021 school year. The attached spreadsheet shows the impact of this directive by comparing those LEAs who are eligible for additional ARP funds either due to their eligibility for sparsity aid or their in-person instruction hours in school year 2020-2021, with Wisconsin's high-need, high-poverty LEAs. This spreadsheet shows that the impact of Wisconsin Motion 57 excludes significant numbers of underserved students from across the state from receiving additional ARP funds and resources, including students in the state's five largest urban districts (Milwaukee Public Schools, Madison Metropolitan School District, Racine Unified School District, Green Bay Area Public Schools, and Kenosha Unified School District). Together these five districts serve over 30 percent of Wisconsin's students experiencing poverty and nearly 70 percent of Wisconsin's Black students. As noted in Section A, Wisconsin students experiencing poverty and Black students are the student populations identified as having the greatest academic needs and that Black students are the students who have likely lost the most instructional time, and who therefore are the students most in need of additional resources and support.

The WDPI will use its ESSER III state set-aside in accordance with Wisconsin Motion 57. The WDPI is committed to ensuring that ARPA funds are used to provide services to the

students most in need of support as a result of the COVID-19 pandemic, including students in the groups listed in question A.3.i.-v.i.i.i. The SEA will require that LEAs eligible for these competitive grants for evidence-based summer learning opportunities target local student groups that have been disproportionately impacted by the COVID-19 pandemic for the evidence-based summer learning opportunities. LEAs may use a combination of state and local data to identify those local student groups and will be required to identify those students being targeted and to select evidence-based improvement strategies that align with the needs of local students being targeted for the summer learning opportunities. Local sources of data may be school based, such as attendance rates, graduation rates, test scores, grades, student demographics (economically disadvantaged percentage, students with disabilities percentage, and English Learners percentage), and may also include community level indicators, such as rates of food insecurity, homelessness, or unemployment. In addition to identifying target groups, applicant LEAs will be required to highlight the academic, social, emotional, and mental health needs of students in the targeted groups that will be addressed by the ARPA-funded summer programming and enrichment opportunity. Applicant LEAs will also be required to demonstrate that the evidence-based practices proposed in the grant application address the identified needs of the targeted groups. In the competitive application process, LEAs will conduct a needs assessment and describe how they have identified students within the target population for services. Based on the needs assessment, applicants will provide a plan, based on evidence-based practices, to mitigate some of the identified academic and/or non-academic barriers the identified students face(d). Finally, applicants will propose effective outreach strategies to target and reach the prioritized population of students, as well as ongoing retention efforts, which may include such stakeholder-identified focal areas as building trust, fostering relationships, and increasing positive experiences between families and schools.

The WDPI will support those LEAs eligible to receive competitive grants for summer programming and enrichment opportunities from the state set-aside with technical assistance and resources to identify those students in their communities who should be targeted for participating in summer programming and enrichment opportunities, including students who missed the most in-person instruction during the 2019-2020 and 2020-2021 school years, along with those students who did not consistently participate in remote instruction when offered. Technical assistance and resources from the SEA will focus on supporting LEAs in using attendance and chronically absent data available in the statewide longitudinal data system along with student achievement data and local data those LEAs have access to in order to identify students most in need. The SEA will also provide models or examples of effective evidence-based summer programming and enrichment opportunities.

If there are any remaining funds after awarding competitive grants for evidence-based summer programming to eligible LEAs, the SEA will open additional competitive grants for evidence-based summer programming to the top five high-needs, high-poverty LEAs in order to ensure that ARP funds are being directed to students who have been impacted the most by the COVID-19 pandemic.

The SEA's role in addressing summer learning and enrichment is to provide guidance to LEAs in the selection of appropriate evidence-based programs, frameworks, and strategies by directing LEAs to national registries and existing WDPI research-based guiding principles, and in providing or accessing training on how to effectively implement the chosen programs and practices. For the competitive grants for evidence-based summer programming, the SEA will utilize "The Evidence Base for Summer Enrichment and

Comprehensive Afterschool Opportunities" (Peterson & Vandell, 2021), the guiding principles found in The Learning Policy Institute's "Accelerating Learning As We Build Back Better" (Darling-Hammond, Edgerton, 2021), and stakeholder feedback collected by the SEA to inform the allowable activities funded with these ESSER III funds. For the competitive grants for after school programming, the SEA will utilize "*Guiding Principles for 21st CCLC Programs*", a framework for programs to which applicants will align their plans for services and activities. This framework is based on research-based practices for comprehensive out of school time programs as presented in "The Evidence Base for Summer Enrichment and Comprehensive Afterschool Opportunities" (Peterson & Vandell, 2021), in addition to stakeholder feedback collected by the SEA, which will guide the department's vision for these programs and inform its training and technical assistance priorities.

The WDPI recognizes the impact that quality summer learning programs have on students served and will create these competitive grants guided by the following guiding principles identified by the SEA:

- An equitable, multi-level system of supports where schools provide varying types of supports at differing levels of intensity to proactively and responsively adjust to the needs of the whole child leads to student success.
- Summer learning programming should create opportunities to foster joy and engagement.
- High-quality, standards-aligned curriculum can be contextualized within place-based and/or project-based learning, which will provide rigor and relevance in students' learning.
- All students need to have access to and be engaged with grade-level curriculum.
- Scaffolding students towards proficiency in grade-level standards means providing "just-in-time" supports provided within the context of grade-level instruction.
- To increase program effectiveness and maximize return on investment, systems should focus on ensuring strong student attendance and productive use of high-quality instructional time.
- School systems should determine the needs of students in their schools and design an approach that eliminates barriers for students to access summer learning and also addresses social and emotional wellbeing.

The WDPI will also be guided by the vision outlined in The Learning Policy Institute's "Accelerating Learning As We Build Back Better" (Darling-Hammond, Edgerton, 2021). This vision includes the following components of effective summer and regular school year learning programs:

- Experience warm relationships and social-emotional supports achieved by redesigning schools so that they are relationship-centered, with built-in time for creating community, trust, and belonging among students and with families;
- Engage in outdoor play and exercise, expressive arts, and collaborative activities that support brain development and learning;

- Encounter authentic, culturally responsive learning tasks and inquiry projects connected to their experiences that allow them to understand and positively impact their environment;
- Assess what students need both socially and emotionally as well as academically, address trauma with healing and support, and identify the next steps they are ready to take in their learning rather than labeling them.

The WI DPI has provided comprehensive guidance on how to plan summer learning for the whole child at https://dpi.wi.gov/cal/summer-learning . In addition to the guiding principles and vision described above, the SEA will incorporate stakeholder feedback collected by the SEA into the design of these competitive grants. The WDPI will share models and examples of successful evidence-based summer programming opportunities and provide resources and technical assistance in the implementation of these ESSER III funded summer program opportunities.

The WDPI will evaluate the impact of the programs on an ongoing basis to understand if they are working through targeted monitoring of LEA recipients of the competitive grants coupled with analysis of data available in the state's longitudinal data system.

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.

Motion #57 included an earmark for expanding evidence-based after-school programing opportunities. The committee directed WDPI to use $15.4 million from the ESSER III state set-aside for evidence-based afterschool programming opportunities that will be awarded as competitive grants. The competitive grant is restricted in the first round to those school districts that were eligible to receive a sparsity aid payment in fiscal year 2021. If funds remain, there will be a second round of the competitive grant available to all districts.

The Department's understanding of Wisconsin's Joint Committee on Finance's (JCF's) Motion 57 is that it directs Wisconsin to limit eligibility for evidence-based summer learning opportunities to LEAs eligible for sparsity aid during the 2020-2021 school year. The attached spreadsheet shows the impact of this directive by comparing those LEAs who are eligible for additional ARP funds either due to their eligibility for sparsity aid or their in-person instruction hours in school year 2020-2021, with Wisconsin's high-need, high-poverty LEAs. This spreadsheet shows that the impact of Wisconsin Motion 57 excludes significant numbers of underserved students from across the state from receiving additional ARP funds and resources, including students in the state's five largest urban districts (Milwaukee Public Schools, Madison Metropolitan School District, Racine Unified School District, Green Bay Area Public Schools, and Kenosha Unified School District). Together these five districts serve over 30 percent of Wisconsin's students experiencing poverty and nearly 70 percent of Wisconsin's Black students. As noted in Section A, Wisconsin students experiencing poverty and Black students are the student populations identified as having the greatest academic needs and that Black students are the students who have likely lost the most instructional time, and who therefore are the students most in need of additional resources and support.

The WDPI will use its ESSER III state set-aside in accordance with Wisconsin Motion 57. The WDPI is committed to ensuring that ARPA funds are used to provide services to the students most in need of support as a result of the COVID-19 pandemic, including students in the groups listed in question A.3.i.-v.i.i.i. The SEA will require that LEAs eligible for these competitive grants for evidence-based out-of-school learning opportunities target local student groups that have been disproportionately impacted by the COVID-19 pandemic for the evidence-based summer learning opportunities. LEAs may use a combination of state and local data to identify those local student groups and will be required to identify those students being targeted and to select evidence-based improvement strategies that align with the needs of local students being targeted for the out-of-school learning opportunities. Local sources of data may be school based, such as attendance rates, graduation rates, test scores, grades, student demographics (economically disadvantaged percentage, students with disabilities percentage, and English Learners percentage), and may also include community level indicators, such as rates of food insecurity, homelessness, or unemployment. In addition to identifying target groups, applicant LEAs will be required to highlight the academic, social, emotional, and mental health needs of students in the targeted groups that will be addressed by the ARPA-funded summer programming and enrichment opportunity. Applicant LEAs will also be required to demonstrate that the evidence-based practices proposed in the grant application address the identified needs of the targeted groups. In the competitive application process, LEAs will conduct a needs assessment and describe how they have identified students within the target population for services. Based on the needs assessment, applicants will provide a plan, based on evidence-based practices, to mitigate some of the identified academic and/or non-academic barriers the identified students face(d). Finally, applicants will propose effective outreach strategies to target and reach

the prioritized population of students, as well as ongoing retention efforts, which may include such stakeholder-identified focal areas as building trust, fostering relationships, and increasing positive experiences between families and schools.

The WDPI will support those LEAs eligible to receive competitive grants for out-of-school learning opportunities from the state set-aside with technical assistance and resources to identify those students in their communities who should be targeted for participating in such learning opportunities, including students who missed the most in-person instruction during the 2019-2020 and 2020-2021 school years, along with those students who did not consistently participate in remote instruction when offered. Technical assistance and resources from the SEA will focus on supporting LEAs in using attendance and chronically absent data available in the statewide longitudinal data system along with student achievement data and local data those LEAs have access to in order to identify students most in need. The SEA will also provide models or examples of effective out-of-school learning opportunities.

If there are any remaining funds after awarding competitive grants for evidence-based out-of-school programming to eligible LEAs, the SEA will open additional competitive grants for evidence-based summer programming to the top five high-needs, high-poverty LEAs in order to ensure that ARP funds are being directed to students who have been impacted the most by the COVID-19 pandemic.

The SEA's role in addressing out-of-school learning is to provide guidance to LEAs in the selection of appropriate evidence-based programs, frameworks, and strategies by directing LEAs to national registries and existing WDPI research-based guiding principles, and in providing or accessing training on how to effectively implement the chosen programs and practices. For the competitive grants for out-of-school programming, the SEA will utilize "*Guiding Principles for 21st CCLC Programs*", a framework for programs to which applicants will align their plans for services and activities. This framework is based on research-based practices for comprehensive out of school time programs as presented in "The Evidence Base for Summer Enrichment and Comprehensive Afterschool Opportunities" (Peterson & Vandell, 2021), in addition to stakeholder feedback collected by the SEA, which will guide the department's vision for these programs and inform its training and technical assistance priorities.

The WDPI recognizes the impact that quality out-of-school time (OST) programs have on students served and will create these competitive grants guided by the model established by the successful 21st Century Community Learning Center (CCLC) grant program administered by the SEA. The WDPI has developed Guiding Principles for 21st CCLC Programs, which will guide the department's vision for these programs and inform its training and technical assistance priorities. The twelve Guiding Principles, which reflect the research on effective OST programs, encompass:

- Development of youth centered vision, mission, and goals
- Strong leadership and qualified staff
- Sound fiscal management and sustainability planning
- Commitment to program improvement
- Diverse programming
- Academic enrichment
- Integrated social and emotional learning
- Student voice, choice, and leadership opportunities
- Safe, supported, and welcoming program environment

- Community collaboration
- School day collaboration and alignment
- Family Engagement

The SEA will utilize ESSER III state set-aside funds to promote an evidence-based framework for programs to which applicants will align their plans for services and activities. This framework is based on research-based practices for comprehensive OST programs as presented in "The Evidence Base for Summer Enrichment and Comprehensive Afterschool Opportunities" (Peterson & Vandell, 2021) and reflects the following:

- Active, hands-on learning experiences
- Development and practice of interpersonal competencies
- Meaningful and relevant activities and learning opportunities
- Opportunities to practice skills that promote mastery
- Learning that engages students in new experiences and development of new skills, while prioritizing student voice and choice
- Programming that engages community partnerships and collaboration, including adult family members

In addition to the guiding principles and evidence-based framework described above, the SEA will incorporate stakeholder feedback collected by the SEA into the design of these competitive grants.

Each applicant for the competitive grant program will be required to identify evidence-based activities that align with the framework described above and that are most appropriate for their setting and the identified academic, social, emotional, and mental health needs of students. A description of these practices and how they align with the framework will be included in their application. In addition, applicants will be expected to identify meaningful and measurable objectives and annually report on their progress to WDPI. The SEA will track this progress annually and provide technical assistance in partnership with the Wisconsin Afterschool Network, and other local, statewide, and national partners, to address continuous improvement needs and improve outcomes for local programs.

Applicants will be encouraged to work with community partners, such as community-based organizations, that have expertise in the area of OST programming. These partnerships will allow applicants to draw on the evidence-based practices being used by those organizations that are particularly appropriate for OST programs.

As a local control state, WDPI will not choose an evidence-based program to be required of all applications. Instead, each applicant will be required to identify evidence-based programs that are most appropriate for their setting and include those in their application and proposed program plan. The SEA will provide guidance to applicants regarding how to evaluate and choose appropriate evidence-based programs drawing, in particular, on the framework developed by Peterson and Vandell (2021) described above.

The WDPI will evaluate the impact of the programs on an ongoing basis through targeted monitoring of LEA recipients of the competitive grants coupled with analysis of data available in the state's longitudinal data system.

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 prescribed by Motion #57, there are no funds set aside for emergency funding.

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.

Section 2001(d)(2) of the ARP Act, states, "Each State shall make allocations under paragraph (1) to local educational agencies in an expedited and timely manner and, to the extent practicable, not later than 60 days after the receipt of such funds."

The WDPI did make formula funds available to the LEAs greatest extent practicable because we:

- Shared the ARP ESSER formula allocations with LEAs as part of the WDPI's proposal to Wisconsin's Joint Finance Committee for the 10% set-aside on April 1, 2021.
- Provided LEA assurances for ARP ESSER III funds on April 15, 2021 in WISEgrants.
- Notified LEAs of their ARP ESSER *formula* allocations along with Wisconsin Motion 57, Wisconsin Joint Committee on Finance's decision regarding spending the 10% set-aside, to LEAs May 27, 2021.
- Notified LEAs of their ARP ESSER formula allocations on July 13, 2021.
- Reiterated the performance period for ARP ESSER Funds (March 13, 2020 - September 30, 2024). Verbally (at many virtual conferences and meetings) and in writing. It also appears on our website (https://dpi.wi.gov/arp/esser-iii) in several areas:
    - Under the "Performance Period" heading
    - Under the "Fiscal Considerations" section; and
    - In the publicly available chart comparing the usage of funds for all three ESSER programs.

WDPI will require LEAs to submit their ARP ESSER application within 90 days after the application is available in Wisconsin's federal grants management portal, WISEgrants. The ARP ESSER application will require LEAs to provide:

- assurances to follow all state, federal, and local statutes, regulations, and policies;
- information regarding requirements for the Safe Return to In-Person Instruction and Continuity of Services Plan (as described in Section B of this document); and
- the plan for ARP ESSER III funds.

As noted above, formula allocations and assurances are already available to LEAs. The WDPI is planning for a November 15 release date of the WISEgrants ESSER III application for LEAs to begin completing the ESSER III LEA Plan and proposed budgets. Based on the target release date of November 15, the deadline for LEAs to submit their ESSER III applications will be February 14.

The extent to which Wisconsin school districts and individual schools choose to implement the infection control and mitigation measures recommended by the Centers for Disease Control and Prevention(CDC), the Wisconsin Department of Health Services (DHS) and the best practice recommendations of the WDPI is a local decision.

The WDPI works closely with the state health agency and provides and communicates recommendations to LEAs that are based upon DHS and CDC guidance. The most recent

guidance was published on August 10, 2021, and is found at https://dpi.wi.gov/sspw/covid-19-information. LEAs are instructed to work with the local and tribal health departments to best implement the guidance. WDPI also recommended that LEAs work with their insurance carriers and legal counsel in determining to what degree the LEA implements mitigation measures.

As a local control state, the SEA will assist schools and districts in identifying local data sources that can assist them in identifying their greatest needs, groups most at risk and to guide instructional and social and emotional learning and supports. While the WDPI believes that local schools and communities are in the best position to determine the most appropriate evidence-based programs, frameworks, and strategies to address academic needs, social and emotional learning, and student mental health and wellness, a consistent theme in SEA stakeholder engagement sessions and feedback forms was that the SEA create a list of evidence-based improvement strategies (EBIS) for LEAs to consider selecting and supporting with their ESSER III funds. In response to this feedback, the WDPI will create an ESSER III application in the state's federal grant management system, WISEgrants, with a pre-populated list of EBIS consistent with EBIS that have been identified by USDE, and existing SEA priorities and initiatives along with the option of "other" where LEAs can identify an alternative EBIS they have identified as meeting the needs of local students. In this case, LEAs will also be asked to identify the tier of evidence that EBIS meets and to provide a link to the source. Designing the application in this way will ultimately ease the burden on the SEA of identifying the EBIS LEAs select to support with ESSER III funds, and will also allow for the SEA to identify, create, and support appropriate supports for LEAs.

The WDPI will program WISEgrants to require LEAs to identify how each budget item will support prevention and mitigation strategies; evidenced based improvement strategies; or be used for other purposes to prepare for, respond to, or prevent COVID-19. LEAs will identify which evidence-based improvement strategies they will implement with ARP ESSER III funds (funds from the formula as well as additional funding provided through Motion #57) and WDPI will program validations with WISEgrants to ensure LEAs budget and expend funds required to be used for evidence-based improvement strategies.

WDPI will also require (in WISEgrants) LEAs to identify the extent to which they will use educator practice and student outcome data to ensure that the interventions it implements will respond to the academic, social, emotional, and mental health needs of all students.

In order to support LEAs and ensure that LEAs have complete, accurate plans, WDPI will program WISEgrants to create each LEA's ARP ESSER plan based on what they put in their application and what they include in their detailed budgets. WISEgrants will generate an ARP ESSER III Plan Report for each LEA when their application is approved, and the system will direct LEAs to then post their ARP ESSER III Plan on their website. This functionality reduces significant burden for LEAs. Each time an LEA submits a revision to the application or budget that is approved by DPI, WISEgrants will generate an updated ARP ESSER III Plan for the LEA to post on their website. Additionally, WDPI staff will also ensure that all LEAs' ARP ESSER III Plans are available to the public by posting them to a link on our website: https://dpi.wi.gov/arp/esser-iii. The link will be created once DPI approves 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.

LEAs must include stakeholders in the planning process for both the Safe Return to In-Person Instruction and Continuity of Services Plan as well as the ESSER III plan for funding, In response to stakeholder feedback, the WDPI will provide LEAs resources for meaningful stakeholder engagement. These resources include an editable slide deck that LEAs can customize and use as part of their local stakeholder engagement efforts, and state and national resources on effective stakeholder engagement practices.

As part of the application process ARP ESSER application process in WISEgrants, LEAs will be required to describe their LEA's level of stakeholder engagement, including the extent to which they engaged currently and historically marginalized groups, such as students and families of color, American Indian tribes (to the extent present in their communities), stakeholders representing the interests of children with disabilities, youth in foster care, migratory students, children who are incarcerated, and other underserved students, and civil rights organizations.

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;

As a local control state, the WDPI believes that local schools and communities are in the best position to determine the most appropriate evidence-based programs, frameworks, and strategies to address academic needs, social and emotional learning, and student mental health

and wellness. The SEA supports LEAs with technical assistance and resources in identifying their greatest needs, groups most at risk, and to guide decisions about instructional and social and emotional learning and supports. These resources include the WISEdash information system for education data, which includes a public state education data portal and a secure portal with local LEA data. WISEdash is one of the key tools LEAs use while digging into their data to do improvement planning. WISExplore is a data inquiry process developed and supported by regional service providers in collaboration with SEA staff to support LEAs in effectively analyzing their data and using it to engage in district and school improvement efforts. WISExplore consists of a common data inquiry process that teachers and school leaders statewide can use to guide their improvement planning efforts. The Data Inquiry Journal is embedded within WISEdash for Districts. This is the template that WISExplore has developed to be used by districts for school improvement planning and each regional service provider has staff that assist LEAs in using the tool and process. The data inquiry journal allows educators to document ongoing data investigation and design continuous improvement plans all in one convenient location. This interactive tool, designed by Wisconsin educators, imports local data for analysis within a secure platform to protect student privacy. It includes all the essential components for continuous improvement, meeting requirements for continuous improvement planning in ESEA and IDEA by supporting LEA teams as they engage in critical conversations about local data to address gaps and promote equitable outcomes for each learner. This tool contains three parts: a student data inquiry component, a practice inquiry component, and a summary and improvement plan. Together, these three parts lead educator teams through a research-based process of data inquiry and improvement planning. The data inquiry journal automatically uploads and integrates data pictures to document progress over time and includes options to export data for further internal use and required state reporting.

While the WDPI believes that local schools and communities are in the best position to determine the most appropriate evidence-based programs, frameworks, and strategies to address academic needs, social and emotional learning, and student mental health and wellness, a consistent theme in SEA stakeholder engagement sessions and feedback forms was that the SEA create a list of evidence-based improvement strategies (EBIS) for LEAs to consider selecting and supporting with their ESSER III funds. In response to this feedback, the WDPI will create an ESSER III application in the state's federal grant management system, WISEgrants, with a pre-populated list of EBIS consistent with EBIS that have been identified by USDE, and existing SEA priorities and initiatives along with the option of "other" where LEAs can identify an alternative EBIS they have identified as meeting the needs of local students. In this case, LEAs will also be asked to identify the tier of evidence that EBIS meets and to provide a link to the source. Designing the application in this way will ultimately ease the burden on the SEA of identifying the EBIS LEAs select to support with ESSER III funds, and will also allow for the SEA to identify, create, and support appropriate supports for LEAs. As part of the ESSER III application, LEAs will also be required to develop a budget and connect each detailed budget item to an ESSER allowed activity, including EBIS. WDPI staff reviewing these applications will review for consistency and coherence between the selected EBIS and budget items.

The SEA will leverage an existing support structure, the Technical Assistance Network for Improvement (TA Network), made up of regional service providers, to provide more extensive support of federally identified schools. Regional staff within the TA Network provide technical assistance to federally identified schools/districts for their continuous improvement efforts, including the selection and implementation of evidence-based improvement strategies

intended to improve student outcomes, with acceleration for students of color and students with IEPs. TA Network teams' focus on coaching needs assessments with root cause analysis, along with auditing resource inequities and supporting continuous improvement plan development for their districts/schools ensures strategic opportunities to address COVID impacts, including learning loss, equitable access, mental health issues, and other concerns that arose during the pandemic through in-person, virtual, and hybrid formats. The SEA will engage in targeted monitoring of additional LEAs based on staff capacity in order to determine the outcomes achieved with ESSER III dollars. These monitoring efforts will focus on reviewing LEA data, including student achievement data and opportunity to learn measures.

Given the time frame for spending ESSER III funds and what is known about the length of time needed to achieve full implementation and results of evidence-based improvement strategies, WDPI believes that the information we will ultimately collect will be outcome data on initial implementation of EBIS.

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

To support those students who have been disproportionately impacted by COVID-19 the SEA will provide guidance to LEAs regarding how to evaluate and choose appropriate evidence-based improvement strategies, programs, and frameworks based on student needs. The SEA supports LEAs with technical assistance and resources in identifying their greatest needs, groups most at risk, and to guide decisions about instructional and social and emotional learning and supports. These resources include the WISEdash information system for education data and the WISExplore data inquiry process with the embedded data inquiry journal.

The SEA will leverage an existing support structure, the Technical Assistance Network for Improvement made up of regional service providers, to engage in support of federally identified schools. Regional staff within the TA Network provide technical assistance to federally identified schools/districts for their continuous improvement efforts, including the selection and implementation of evidence-based improvement strategies intended to improve student outcomes, with acceleration for students of color and students with IEPs. TA Network teams' focus on coaching needs assessments with root cause analysis, along with auditing resource inequities and supporting continuous improvement plan development for their districts/schools ensures strategic opportunities to address COVID impacts, including learning loss, equitable access, mental health issues, and other concerns that arose during the pandemic through in-person, virtual, and hybrid formats. The SEA will engage in targeted monitoring of additional LEAs based on staff capacity in order to determine the outcomes achieved with ESSER III dollars. These monitoring efforts will focus on reviewing LEA data, including student achievement data and opportunity to learn measures.

Given the time frame for spending ESSER III funds and what is known about the length of time needed to achieve full implementation and results of evidence-based improvement strategies, WDPI believes that the information we will ultimately collect will be outcome data on initial implementation of EBIS.

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.

The WDPI will support and monitor LEAs in using ARP ESSER funds to identify, re-engage, and support students most likely to have experienced the impact of lost instruction time on student learning by providing technical assistance in utilizing data in the WISEdata and WISEdash systems to identify those students who missed the most in-person instruction during the 2019-2020 and 2020-2021 school years, those students who did not consistently participate in remote instruction, and those students most at risk of dropping out of school, including student demographics, attendance, chronic absenteeism, and achievement data, along with the various early warning system data.

To support those students who have been disproportionately impacted by COVID-19 the SEA will provide guidance to LEAs regarding how to evaluate and choose appropriate evidence-based improvement strategies, programs, and frameworks based on student needs. The SEA supports LEAs with technical assistance and resources in identifying their greatest needs, groups most at risk, and in guiding decisions about instructional and social and emotional learning and supports.

The SEA will leverage an existing support structure, the Technical Assistance Network for Improvement made up of regional service providers, to engage in more extensive monitoring of federally identified schools. Regional staff within the TA Network provide technical assistance to federally identified schools/districts for their continuous improvement efforts, including the selection and implementation of evidence-based improvement strategies intended to improve student outcomes, with acceleration for students of color and students with IEPs. TA Network teams' focus on coaching needs assessments with root cause analysis, along with auditing resource inequities and supporting continuous improvement plan development for their districts/schools ensures strategic opportunities to address COVID impacts, including learning loss, equitable access, mental health issues, and other concerns that arose during the pandemic through in-person, virtual, and hybrid formats. The SEA will engage in targeted monitoring of additional LEAs based on staff capacity in order to determine the outcomes achieved with ESSER III dollars. These monitoring efforts will focus on reviewing LEA data, including student achievement data and opportunity to learn measures.

Given the time frame for spending ESSER III funds and what is known about the length of time needed to achieve full implementation and results of evidence-based improvement strategies, WDPI believes that the information we will ultimately collect will be outcome data on initial implementation of EBIS.

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.

The WDPI recognizes the importance of supporting LEAs in utilizing ESSER III funds to support those students who have been disproportionately impacted by the COVID-19 pandemic. Preliminary national and state data show that inequities that existed prior to the pandemic have been exacerbated. The WDPI will provide technical assistance and resources to support LEAs in identifying their greatest needs so that they may plan for and expend ARP ESSER III funds in ways that provide the greatest supports to those students who have been impacted the most.

As a local control state, the SEA will assist schools and districts in identifying local data sources that can assist them in identifying their greatest needs, groups most at risk and to guide instructional and social and emotional learning and supports. These data sources include the WISEdash information system for education data, which includes a public state education data portal, a secure portal with local LEA data, and the WISExplore data inquiry process to support LEAs in effectively analyzing their data and using it to engage in district and school improvement efforts. The data inquiry journal allows educators to document ongoing data investigation and design continuous improvement plans all in one convenient location. This interactive tool, designed by Wisconsin educators, imports local data for analysis within a secure platform to protect student privacy. It includes all the essential components for continuous improvement, meeting requirements for continuous improvement planning in ESEA and IDEA by supporting LEA teams as they engage in critical conversations about local data to address gaps and promote equitable outcomes for each learner. This tool contains three parts: a student data inquiry component, a practice inquiry component, and a summary and improvement plan. Together, these three parts lead educator teams through a research-based process of data inquiry and improvement planning. The data inquiry journal automatically uploads and integrates data pictures to document progress over time and includes options to export data for further internal use and required state reporting. In addition, to support LEAs in meeting the needs of students with IEPs, WDPI also has resources on progress monitoring of IEP goals.

Additional technical assistance resources that the SEA supports and encourages LEAs to utilize include the Wisconsin School Mental Health Framework, resources to support comprehensive school mental health and SEL implementation, trauma sensitive schools online learning series, which includes two modules specifically designed to provide learning on alternative school discipline policies and practices; restorative practices training through the Wisconsin Safe and Healthy Schools (WISH) Center; team-based trainings on establishing and implementing an equitable multi-level system of support and PBIS through the Wisconsin RtI Center; youth mental health first aid training; and guidance on effective trauma sensitive culturally responsive truancy enforcement, among others. Recognizing the role that race plays in a predictor of student achievement outcomes, WDPI also offers LEAs the Culturally Responsive Problem Solving module and guide.

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 students' 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.

Wisconsin continues to face a shortage of educators across the state. Shortages predated the COVID-19 pandemic. Wisconsin determines shortage areas through data on teacher licensure, with specific Tier I licenses indicating shortages.

Wisconsin has a tiered licensing system. Tier I licenses are for immediate needs. Tier I includes licenses requested by school districts to cover assignments for which there are no qualified applicants at Tiers II through IV. Tier II licenses are initial licenses granted to candidates that have just completed all requirements leading to a provisional license. Once a licensee has completed six semesters of successful teaching experience on a Tier II license, they may move to a Tier III lifetime license. Tier IV licenses are optional licenses for those who have completed national board certification or the Wisconsin master educator requirements.

The data below in table F1 represents the number of Tier I, 1-year licenses with stipulations that were issued in these subject areas for Wisconsin school districts over the last three school years for which Wisconsin has complete data. These are considered emergency licenses and in order to get such a license, school districts must attest they could not find or hire a qualified educator regularly licensed in these subject areas for that assignment.

Table F1

Wisconsin Tier I License Numbers School Years 17-18, 18-19, and 19-20

Shortage Area	2017-18	2018-19	2019-20
Special Education	914	1292	1270
Bilingual	222	186	182

ESL	118	105	93
Stem	285	218	231
CTE	82	71	72
Early Childhood	103	126	170
School counselors	27	21	30
School Social workers	31	28	30
School Psychologists	10	22	68
Nurses	N/A	N/A	N/A

There are some areas of licensure Wisconsin does not track in this manner, such as school nurse licensure, as those licenses are not required through the Department of Public Instruction (DPI). School nurses must, instead, have licensure to work as a registered nurse through the Department of Safety and Professional Services.

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.

Wisconsin will continue to evaluate licensure data to identify shortage areas and work with educational stakeholders to address the supply of qualified educators in Wisconsin schools. Data collected in Wisconsin's federal grants management system, WISEgrants, for CARES reporting showed a less than 1% difference in the number of FTEs employed by school districts between September 30, 2019, and September 30, 2020.

Table F2
Number of FTE Positions September, 2019 and September, 2020

Full-time equivalent (FTE) positions as of September 30, 2019	Full-time equivalent (FTE) positions as of March 13, 2020	Full-time equivalent (FTE) positions as of September 30, 2020	Difference between Sept 30, 2019 and Sept 30, 2020
108,381.46	108,376.93	108,291.65	Less than 1%

			(89.81 fewer FTE)

Data source: WISEgrants, August 2, 2021; note: 17 LEAs not reporting

Of the funds claimed as of August 2, 2021, LEAs have used 37.77% of their ESSER II; 23.35% GEER; and 14.16% ESSER I on personnel costs including salaries and fringe benefits.

Table F3
ESSER Grant Funds Claimed for Personnel

Grant Program	Personnel Costs Claimed to Date (salaries and fringe benefits - only)	Total Amount Claimed to Date	Percentage of Personnel Costs Claimed to Date
ESSER I	$15,724,216.45	$111,037,439.37	14.16%
GEER	$4,287,792.32	$18,365,303.17	23.35%
ESSER II	$8,700,509.18	$23,035,594.82	37.77%

Data source: WISEgrants, August 2, 2021

In order to ensure the LEAs were paying their employees and contractors to the greatest extent practicable under the CARES Act, WDPI asked LEA to attest to one of the following statements:

- Option 1: The LEA has been paying, and will continue to pay, employees and contractors in the same manner as before any disruptions or closures related to the coronavirus.
- Option 2: The LEA has discontinued payments to any employee or contractor during disruptions or closures related to the coronavirus but will resume these payments upon receipt of CARES Act funds.
- Option 3: The LEA will continue to pay employees and contractors to the greatest extent practicable. The LEA will be required to provide a reasonable explanation as to why the LEA is unable to pay its employees and contractors in the same manner as before any disruptions or closures related to the coronavirus, and how payments to employees and contractors will be made to the greatest extent practicable.

22 LEAs affirmed that they would be able to resume payments to staff and contractors upon receipt of the CARES funds.

Table F4
LEA Ability to Pay Employees and Contractors to the Greatest Extent Practicable Under CARES

Options	Number of LEAs
Option 1 The LEA has been paying, and will continue to pay, employees and contractors in the same manner as before any disruptions or closures related to the coronavirus.	326
Option 2 The LEA has discontinued payments to any employee or contractor during disruptions or closures related to the coronavirus, but will resume these payments upon receipt of CARES Act funds.	22
Option 3 The LEA will continue to pay employees and contractors to the greatest extent practicable. The LEA will be required to provide a reasonable explanation as to why the LEA is unable to pay its employees and contractors in the same manner as before any disruptions or closures related to the coronavirus, and how payments to employees and contractors will be made to the greatest extent practicable.	96

The WDPI supports LEAs in identifying other urgent areas of staffing need in various ways, including the following:

- The goals of the School-Based Mental Health Professionals (SBMHP) grant are to increase the number of school-based mental health professionals recruited and retained in underserved LEAs and reduce the ratio of students to mental health service providers. Another goal is to increase the number of SBMHP hired annually for each LEA with a demonstrated need served by the grant compared with the average number of such professionals hired in each LEA in the five years prior to the grant. This will be achieved through the creation of online certification programs that meet all licensing requirements through University of Wisconsin (UW) Pupil Services educational programs to expand pathways for interested candidates from rural or remote communities, stipends to reduce cost for students, and grow your own initiatives to recruit from within communities to become licensed school based mental health professionals.

- Wisconsin Safe and Healthy Schools (WISH) Center facilitates an annual needs assessment with the field to identify the most urgent needs for professional development. With the pandemic, the needs assessment results continued to highlight the need for continued support around mental health, including the mental health needs of staff. The WISH Center uses the result to create an annual training calendar to facilitate training around mental health to support both students and staff. They have also provided office hours for LEA staff to support immediate needs during COVID.
- The Wisconsin Center for Resilient Schools (WCRS) funded through the CARES Act ESSER 1 allocation, provides coaching to school and district teams to ensure full-scale implementation of comprehensive school mental health, social and emotional learning and trauma sensitive schools. This free resource includes goal setting, program alignment and coherence and comprehensive planning supports.
- WDPI, in partnership with a community mental health agency, provides free training and technical assistance to school districts in implementing the Compassion Resilience Toolkit. The Compassion Resilience Toolkit is free and publicly accessible. The goal of the toolkit is to provide opportunities for educators to develop individual resilience skills, while also building healthy and compassionate school and district cultures. The toolkit supports school leaders in identifying and eliminating systems drivers of burnout and compassion fatigue.
- The DPI state school nurse consultant is providing recommendations to the state Department of Health Services on the use of Public Health Work Force Funding to establish, expand, train and sustain school health services personnel. The state school nurse consultant pulls data from SEA sources on the number of school nurse FTEs and the number of districts without a school nurse. The state school nurse consultant regularly polls school nurses on professional development needs.

These programs will enable LEAs to better support students' academic, social, emotional, and mental health needs.

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).

Wisconsin continues to work with educator preparation programs to address the supply of certified teachers. This includes work with post-baccalaureate programs leading to licensure to

bring in additional teachers as career changers. Post-baccalaureate programs are currently available through a number of regional cooperative educational service agencies and the state's largest school district, Milwaukee Public Schools, has recently received initial approval to be a program provider.

The state works with individual school districts to address unique staffing challenges and advises on licensure pathways available to applicants under state law and administrative rule. Some pathways were specifically built to address shortage needs such as the one-year license with stipulations that allows candidates with a bachelor's degree to teach while working on completing a teacher preparation program and with the support of the employing school district.

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).

A recently signed budget provision will support LEAs in increasing student access to key support staff. This provision provides an increase of $6 million in each year of the biennium for school mental health categorical aid for social workers and increases funding for school-based mental health collaboration grants by $3.5 million in each year of the biennium.

The WDPI provided professional learning and support, as well as technical assistance for key support staff staff during the 2020-2021 school year and will continue these efforts in 2021-2022 in order to increase their efficiency and effectiveness in meeting the needs of students. Efforts include hosting Community of Practice calls; consultation by Education Consultants; resources on comprehensive school mental health, SEL, and compassion resilience; trauma sensitive schools online modules; ethics and boundaries, child abuse and neglect, working with students in out-of-home care, suicide prevention gatekeeper training; and partnerships with the Wisconsin Safe and Healthy Schools (WISH) Center, Cooperative Educational Service Agencies (CESA), the RtI Center, and state/national professional associations for training and resource opportunities. Technical assistance and support to districts in utilizing federal funding sources to increase student access to key support staff will be available from WDPI. WDPI provides technical assistance for state and federal grant opportunities for LEAs that support increasing key support staff and or improving their effectiveness, including Project AWARE, School-Based Mental Health Services Grant, and School Based Mental Health Professionals Grant. Feedback from ARPA stakeholder focus groups has provided direction for the continued support, resources, and technical assistance from WDPI. Planning for the 2021-2022 school year includes orientation and regularly scheduled networking opportunities to professionals in school social work, school counseling and school nursing, a Mental Health Academy, a Comprehensive School Mental Health Framework, and ongoing collaboration to increase and improve resources and support to the field.

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;

The WDPI's strategy to collect data from LEAs on student learning, including the academic impact of lost instructional time during the COVID-19 pandemic, is to begin by reviewing and analyzing data the SEA has available in the state longitudinal data system. The Wisconsin Information System for Education (WISE) consists of multiple tools that support person ID generation and data collection to meet all required district and school state and federal reporting mandates. WISEdata is one of the tools in the WISE suite. It is a multi-vendor, open data collection system that allows school districts, charter schools, and private schools participating in a parental Choice program to submit high quality data to the Wisconsin Department of Public Instruction (WDPI) from the student information system (SIS) vendor of the educational agency's choice. State and federally-required data is automatically pushed from student information systems to the SEA. Agencies across the state also have the ability to send optionally required data to WISEdata in order to automate data transfer to other educational tools and software that they use to provide instruction to their students. Examples include academic and career planning tools, retrieving immunization status from the state health department, and integrating class roster information into third party tools. WISEdash provides multi-year education data about Wisconsin schools in a visually appealing reporting tool. The WISEdash Public Portal is used by districts, schools, parents, researchers, media, and other community members to view data published by DPI. WISEdash for Districts is a secure reporting tool that is used by districts and schools to view their own data submitted via WISEdata for data quality, continuous improvement planning and early warning systems. The data and dashboards provided through WISEdash help all stakeholders better understand education outcomes for Wisconsin students, inform decisions that can help ensure every child has access to the programs and supports they need, and meet federal, state and local reporting requirements. The data available in WISEdash includes data submitted from school districts via WISEdata on student demographics, programs and outcomes as well as additional data sources from assessment vendors (local by district opt in and statewide), student growth, FAFSA completion, and postsecondary.

The SEA will review relevant student data from the WISEdata system, including student demographics, attendance, chronic absenteeism, and achievement data in order to identify groups most impacted by the COVID-19 pandemic. WDPI is currently processing the 2020-21 statewide assessments that were administered so school districts can use this information to address the impact of lost instructional time during the pandemic. This information will first be loaded to WISEdash for Districts where LEAs can securely access the data for their students and plan for the 2021-22 school year with the data. Later in the fall, WDPI will publish the data to its WISEdash Public Portal dashboard where any stakeholder can further review the data to analyze lost instructional time impacts. In addition, WDPI recently created dedicated visuals to show assessment participation so that the 2020-21 assessment results can be analyzed in context.

LEAs will complete their application and proposed use of ESSER III allocations in the state's federal grant management system, WISEgrants. Within this application, LEAs will be required to identify the EBIS they are implementing with ESSER III funds, and they will need to connect their budget items to their selected EBIS. The SEA will engage in targeted monitoring of LEAs to determine the outcomes achieved with ESSER III dollars. The SEA will leverage an existing support structure, the Technical Assistance Network for Improvement made up of regional service providers, to engage in more extensive monitoring of federally identified schools. Regional staff within the TA Network provide technical assistance to federally identified schools/districts for their continuous improvement efforts, including the selection and implementation of evidence-based improvement strategies intended to improve student outcomes, with acceleration for students of color and students with IEPs. TA Network teams' focus on coaching needs assessments with root cause analysis, along with auditing resource inequities and supporting continuous improvement plan development for their districts/schools ensures strategic opportunities to address COVID impacts, including learning loss, equitable access, mental health issues, and other concerns that arose during the pandemic through in-person, virtual, and hybrid formats.

Given the time frame for spending ESSER III funds and what is known about the length of time needed to achieve full implementation and results of evidence-based improvement strategies, WDPI believes that the information we will ultimately collect will be outcome data on initial implementation of EBIS.

Collecting data on EBIS by student groups (per the proposed Federal requirement) is not feasible for the WDPI. It would require LEAs to identify EBIS implemented with specific groups of students at the classroom level as opposed to identifying the EBIS being implemented at the school or district level. Such a data collection would be time consuming both for LEAs and the SEA. Attempting to extrapolate EBIS data from the school level to specific student populations will create data quality issues. The WDPI does not have a system set up to enable this type of data collection.

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);

WISEdash reports on many of the opportunity to learn measures that are important for monitoring and measuring progress. Among these are several early warning systems, including Dropout Early Warning System (DEWS), College and Career Readiness Early Warning System (CCREWS), and Absenteeism Early Warning. The Dropout Early Warning System predicts which students in the middle grades (6-9) are at risk of dropping out based on low attendance and achievement rates, high expulsion and suspension rates along with high mobility rates, including the rating of risk (high, medium or low). The College and Career Readiness Early Warning System looks at several predictions for students in middle grades (6-9) including whether they will meet the college readiness benchmark in ACT subjects, their predicted composite score and whether they will enroll in a four-year college degree program in the first fall after high school. The Absenteeism Early Warning system predicts whether the student is at risk for chronic absenteeism. Absences from the entire school year are used to determine risk levels regardless of the student's current school of enrollment.

WISEdash reports on exclusionary discipline in multiple ways. Districts can view their discipline data both by incidents that occured, including how many students had 3 or more and by the behavior that caused the incident, as well as viewing the data by removal type or disciplinary action. Roster course data including advanced AP and IB coursework began to be collected in WISEdata in the 2018-19 school year. Districts can review this data in WISEdash to further analyze which students have taken those courses and which student groups they are in. In addition, results of AP exams can also be viewed in WISEdash. WDPI rolled out an optional data collection for Digital Equity during the start of the 2020-21 school year in order to address the gap in access to broadband services and devices to access educational content served via broadband. A public dashboard showing statewide data and a map displaying this data were developed to highlight the gaps. 311 districts were reporting data as of the end of July. Data on access to high quality educators can be found via the ESSA tab in the WISEdash Public Portal, which links to a specific page on the Inequitable Distribution of Teachers. Districts are provided with their list of new and out of field teachers annually so they can plan and improve how students are served. This data can also be explored on the WDPI Public Staff Reporting site. Data on access to school counselors, social workers, nurses and school psychologists can also be viewed via the WDPI Public Staff Reporting site via the All Staff report by Assignment Position.

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

WDPI developed and instituted the collection and public release of per-pupil expenditures by school, disaggregated between Federal and state & local funds, as required by the Every Student Succeeds Act, beginning with the 2018-19 school year. WDPI has also

developed and is rolling out for the 2021-22 school year a next generation school finance reporting system that includes the collection of school-level expenditures by function, which will allow Wisconsin to participate in the NCES SLFS survey from 2021-22 onward. The WDPI would need to hire additional staff to support and monitor LEAs to ensure they can meet fiscal requirements such as maintenance of equity.

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

The WDPI has the capacity to report jobs created and retained as required by the CARES Act and can institute the same procedures as those for jobs created and retained for CRRSAA and for ARPA without much burden on either LEAs of the SEA. The WDPI can easily update our tools and resources used for CARES Act reporting and support LEAs with this process.

However, the addition to report jobs created and retained by position type across the LEA is a new requirement, not required in the ARP Act, itself, and could be a major undertaking both by the SEA and LEAs.

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).

The WDPI will use existing systems to the greatest extent practicable to meet the other reporting requirements required by USDE. For example, the SEA system currently in place to meet FFATA requirements will easily incorporate ARP ESSER III funds. WDPI's CARES Act reporting system can also be adapted to accommodate some of the additions.

However, it is important to note that some of the proposed requirements will take extensive time from both the SEA and LEAs. Some of the requirements would require WDPI to revamp current systems or completely build new ones. This also means that WDPI will need to have staff dedicated to creating technical assistance and assist LEAs with all of the proposed requirements. With limited ARP ESSER III administrative funds and the need to hire additional project staff to support review, approval, and technical assistance for ESSER III grant applications, these proposed requirements may be unduly burdensome and not achievable.

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.

The WDPI's monitoring process begins with technical assistance. Helping LEAs understand what the laws, regulations, and rules are upfront prevents unallowed costs and audit findings later in time. The WDPI will provide technical assistance and support regarding all ARP ESSER requirements, allowed activities, and reporting requirements along with the application, budget, and claiming procedures.

The WDPI will also continue to follow its internal procedures for assessing each subrecipient's risk as required under 2 CFR 200.332(b). Additionally, WDPI will use its federal grants management system, WISEgrants, to administer these funds to LEAs. WISEgrants is developed and managed by dedicated WDPI staff, so the ability to distribute and monitor ESSER funds is streamlined and executed in accordance with internal procedures for federal grant programs. WISEgrants aligns with the 2 CFR 200 Federal Uniform Grant Guidance, the Education Department's General Administrative Regulations, General Education Provisions Act, and Wisconsin's Uniform Financial Accounting Requirements.

ARP ESSER subrecipients will be required to complete the following steps in WISEgrants:

1. Digitally sign assurances that the LEA will comply with the provisions of all applicable statutes and regulations, including an assurance about maintaining staff to the extent practicable.
2. Provide information regarding their Return to In-Person Instruction and Continuity of Services Plan (as described in section B).
3. Provide information regarding their ARP ESSER LEA Plan (as described in section E).
4. Provide a description of the steps the LEA proposes to take to ensure equitable access to, and participation in, its Federally assisted program for students, teachers, and other program beneficiaries who may experience any of these barriers: gender, race, national origin, color, disability, and age as required under GEPA Section 427;
5. Develop separate budgets, under a single grant, for costs supporting regular education, special education and food services and community services; and
6. Connect each detailed budget item to an ESSER allowed activity.

Once applications are submitted, WDPI will review applications to ensure costs and activities are reasonable, necessary and allocable to ARP ESSER. WDPI will assist LEAs with any revisions that need to be made.

After applications are approved, LEAs may submit claims for reimbursement on all funds liquidated. LEAs claim funds by budget type: regular education, special education, food service, and community services and by allowable ESSER activity.

Each year, WDPI works with independent audit firms to ensure they understand the federal laws, rules, and regulations and works with the LEAs to resolve any single audit finding identified by the firm(s) as required by 2 CFR 200.332(d)(4).

WDPI currently has two grant specialists solely dedicated to CARES Act and CRRSAA grant programs. They provide technical assistance, review applications and budgets, monitor LEA compliance, and collect the data required for reporting. The WDPI also uses some of its administrative funds to support an accountant's time to review and pay claims as well as a supervisor's time to support this work. WDPI will need to hire at least one more staff person to support the fiscal monitoring and technical assistance requirements necessary for this grant program.

Appendix A: School Operating Status and Instructional Mode Data Template

Indicate the date or time period represented by the following data.

The WDPI has not been required to collect student level data for all public schools on mode of instruction before now (limited, specific data was collected for P-EBT and legislative reporting purposes). The WDPI understands the importance of having instructional mode (learning modality) data for Wisconsin's students and schools moving forward. We are currently planning to implement this new data collection through WISEdata via the Ed-Fi API in a future school year, most likely either the 2022-23 or 2023-24 school years. These reporting requirements will be reviewed and taken into consideration when reviewing and deciding on the final solution for data collection. Implementing the new data collection with fidelity, including clear definitions and use cases, will take time to propose and come to consensus within the Wisconsin education community.

When we integrate the collection into WISEdata, it will be implemented alongside the student group data that is already collected today. In addition, the WISEdash data dashboard has functionality where districts can identify groups of students based on criteria the district determines so that they can then review data just for those students as they move through the dashboards. Examples of data topics available include Enrollment, Attendance, and Assessment data amongst many others. When instructional mode data is added to the dashboards, the data will be available to review for those students and schools as well. This existing functionality will be able to be utilized so that LEAs can review the students who were disproportionately impacted by the pandemic.

In terms of the technical solution, Ed-Fi is proposing three different methods of collection:

1. Program-Calendar method which collects specific scheduled cohorts and their learning modality and length of time in that modality per day (useful if districts have to split their school into half of the students being on campus part of the week and the other half being on campus another part of the week). This is the most granular method of collection.
2. Program-Aggregate method is similar to Program-Calendar except that the detail regarding which day a hybrid cohort is remote, or campus is lost. Instead, a percentage of time or time per week is collected to represent how much time the cohort was in the specific mode of learning.
3. Attendance Method is the third proposed option. It requires the collection of positive attendance, which many Wisconsin LEAs do not currently collect. In addition, it requires the collection of daily attendance. Many LEAs collect daily attendance, but daily attendance is not currently submitted to WDPI today. WDPI may begin doing so in relation to modernizing the collection of finance related student data.

Each of these methods of collection will need to be evaluated in terms of how they fit into the needs of the WDPI uses of the data, how seamless it is for LEAs to collect and enter the data, and how much effort is required for student information system (SIS) vendors to both make changes to collect the data and to make changes to submit the data to WISEdata via the Ed-Fi API.

Once the data is collected, the WDPI will also sync it nightly with WISEdash and present the data back to districts in a secure manner in WISEdash for districts. As required by ARP, we will also publicly report the information in the WISEdash Public Portal.

Table 1

In the most recent time period available, how many schools in your State offered each mode of instruction or learning model described below? Each row should account for all schools in your State, so that, for each row, the sum of the numbers in the "offered to all students," "offered to some students," and "not offered" columns is equal to the number in the "all schools" column.

Add or change rows as needed

Number of schools	**All schools**	**Offered to all students**	**Offered to some students**	**Not offered**
Remote or online only	#	#	#	#
School buildings open with both remote/online and in-person instruction (hybrid)	#	#	#	#
School buildings open with full-time in-person instruction	#	#	#	#

To the extent data are available, please complete the above table for 1) all schools in the State, and 2) separately for each instructional level (e.g., pre-kindergarten/elementary schools, middle schools, high schools).

Table 2

In the most recent time period available, what was the enrollment and mode of instruction for the schools in your State?

Add or change rows as needed

Number of students	**Total enrollment**	**Remote or online only**	**Both remote/online and in-person instruction (hybrid)**	**Full-time in-person instruction**
Students from low-income families	#	#	#	#
White, not Hispanic	#	#	#	#
Black or African American, not Hispanic	#	#	#	#
Hispanic, of any race	#	#	#	#
Asian, not Hispanic	#	#	#	#
American Indian or Alaskan Native, not Hispanic	#	#	#	#
Native Hawaiian or Pacific Islander, not Hispanic	#	#	#	#

Two or more races, not Hispanic	#	#	#	#
Race/Ethnicity information not available	#	#	#	#
English learners	#	#	#	#
Children with disabilities	#	#	#	#
Students experiencing homelessness	#	#	#	#
Children and youth in foster care	#	#	#	#
Migratory students	#	#	#	#

Appendix B: Reporting Language Included in the Grant Award Notification ("GAN")

As described in the Grant Award Notification ("GAN"), the SEA will comply with, and ensure that its LEAs comply with, all reporting requirements at such time and in such manner and containing such information as the Secretary may reasonably require, including on matters such as:

- How the State is developing strategies and implementing public health protocols including, to the greatest extent practicable, policies and plans in line with the CDC guidance related to mitigating COVID-19 in schools;
- Overall plans and policies related to State support for return to in-person instruction and maximizing in-person instruction time, including how funds will support a return to and maximize in-person instruction time, and advance equity and inclusivity in participation in in-person instruction;
- Data on each school's mode of instruction (fully in-person, hybrid, and fully remote) and conditions;
- SEA and LEA uses of funds to meet students' social, emotional, and academic needs, including through summer enrichment programming and other evidence-based interventions, and how they advance equity for underserved students;

- SEA and LEA uses of funds to sustain and support access to early childhood education programs;
- Impacts and outcomes (disaggregated by student subgroup) through use of ARP ESSER funding (e.g., quantitative and qualitative results of ARP ESSER funding, including on personnel, student learning, and budgeting at the school and district level);
- Student data (disaggregated by student subgroup) related to how the COVID-19 pandemic has affected instruction and learning;
- Requirements under the Federal Financial Accountability Transparency Act ("FFATA"); and
- Additional reporting requirements as may be necessary to ensure accountability and transparency of ARP ESSER funds.

Appendix C: Assurances

By signing this document, the SEA assures all of the following:

- The SEA will conduct all its operations so that no person shall be excluded from participation in, be denied the benefits of, or be subject to discrimination under the ARP ESSER program or activity based on race, color, national origin, which includes a person's limited English proficiency or English learner status and a person's actual or perceived shared ancestry or ethnic characteristics; sex; age; or disability. These non-discrimination obligations arise under Federal civil rights laws, including but not limited to Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments Act of 1972, section 504 of the Rehabilitation Act of 1973, and the Age Discrimination Act of 1975. In addition, the SEA must comply with all regulations, guidelines, and standards issued by the Department under any of these statutes;
- The SEA will comply with all ARP Act and other ARP ESSER requirements and all requirements of its Grant Award Notification, including but not limited to:
    - Complying with the maintenance of effort provision in section 2004(a)(1) of the ARP Act, absent a waiver by the Secretary pursuant to section 2004(a)(2) of the ARP Act; and
    - Complying with the maintenance of equity provisions in section 2004(b) of the ARP Act, and ensuring its LEAs comply with the maintenance of equity provision in section 2004(c) of the ARP Act (please note that the Department will provide additional guidance on maintenance of equity shortly);
- The SEA will allocate ARP ESSER funds to LEAs in an expedited and timely manner and, to the extent practicable, not later than 60 days after the SEA receives ARP ESSER funds (i.e., 60 days from the date the SEA receives each portion of its ARP ESSER funds). An SEA that is not able to allocate such funds within 60 days because it is not practicable (e.g., because of pre-existing State board approval requirements) will provide an explanation to the Department within 30 days of receiving each portion of its ARP ESSER funds (submitted via email to your Program Officer at [State].OESE@ed.gov (e.g., Alabama.OESE@ed.gov)), including a description of specific actions the SEA is taking to provide ARP ESSER funds to LEAs in an expedited and timely manner and the SEA's expected timeline for doing so;
- The SEA will implement evidence-based interventions as required under section 2001(f) of the ARP Act and ensure its LEAs implement evidence-based interventions, as required by section 2001(e)(1) of the ARP Act;
- The SEA will address the disproportionate impact of the COVID-19 pandemic on underserved students (i.e., students from low-income families, students from racial or ethnic groups (e.g., identifying disparities and focusing on underserved student groups by race or ethnicity), gender (e.g., identifying disparities and focusing on underserved student groups by gender), English learners, children with disabilities, students experiencing homelessness, children and youth in foster care, and migratory students), as required under section 2001(f) of the ARP Act, and ensure its LEAs address the disproportionate impact of the COVID-19 pandemic on underserved students (i.e., students from low-income families, students from racial or ethnic groups, gender, English learners, children with disabilities, students experiencing homelessness, children and

youth in foster care, and migratory students), as required by section 2001(e)(1) of the ARP Act; and

- The SEA will provide to the Department: (1) the URL(s) where the public can readily find data on school operating status and (2) the URL(s) for the SEA and/or LEA websites where the public can find the LEA plans for a) the safe return to in-person instruction and continuity of services required under section 2001(i) of the ARP Act, and b) use of ARP ESSER funds. SEAs should consider ensuring a standardized URL format in all cases (e.g., xxx.gov/COVIDplan).

Appendix D

OMB Control No. 1894-0005 (Exp. 06/30/2023)

NOTICE TO ALL APPLICANTS

The purpose of this enclosure is to inform you about a new provision in the Department of Educations General Education Provisions Act ("GEPA") that applies to applicants for new grant awards under Department programs. This provision is Section 427 of GEPA, enacted as part of the Improving America's Schools Act of 1994 (Public Law (P.L.) 103-382).

To Whom Does This Provision Apply?

Section 427 of GEPA affects applicants for new grant awards under this program. **ALL APPLICANTS FOR NEW AWARDS MUST INCLUDE INFORMATION IN THEIR APPLICATIONS TO ADDRESS THIS NEW PROVISION IN ORDER TO RECEIVE FUNDING UNDER THIS PROGRAM.**

(If this program is a State-formula grant program, a State needs to provide this description only for projects or activities that it carries out with funds reserved for State-level uses. In addition, local school districts or other eligible applicants that apply to the State for funding need to provide this description in their applications to the State for funding. The State would be responsible for ensuring that the school district or other local entity has submitted a sufficient section 427 statement as described below.)

What Does This Provision Require?

Section 427 requires each applicant for funds (other than an individual person) to include in its application a description of the steps the applicant proposes to take to ensure equitable access to, and participation in, its Federally-assisted program for students, teachers, and other program beneficiaries with special needs. This provision allows applicants discretion in developing the required description. The statute highlights six types of barriers that can impede equitable access or participation: gender, race, national origin, color, disability, or age. Based on local circumstances, you should determine whether these or other barriers may prevent your students, teachers, etc. from such access to, or participation in, the Federally-funded project or activity. The description in your application of steps to be taken to overcome these barriers need not be lengthy; you may provide a clear and succinct description of how you plan to address those barriers that are applicable to your circumstances. In addition, the information may be provided in a single narrative, or, if appropriate, may be discussed in connection with related topics in the application.

Section 427 is not intended to duplicate the requirements of civil rights statutes, but rather to ensure that, in designing their projects, applicants for Federal funds address equity concerns that may affect the ability of certain potential beneficiaries to fully participate in the project and to achieve high standards. Consistent with program requirements and its approved application, an applicant may use the Federal funds awarded to it to eliminate barriers it identifies.

What are Examples of How an Applicant Might Satisfy the Requirement of This Provision?

The following examples may help illustrate how an applicant may comply with Section 427.

(1) An applicant that proposes to carry out an adult literacy project serving, among others, adults with limited English proficiency, might describe in its application how it intends to distribute a brochure about the proposed project to such potential participants in their native language.

(2) An applicant that proposes to develop instructional materials for classroom use might describe how it will make the materials available on audio tape or in braille for students who are blind.

(3) An applicant that proposes to carry out a model science program for secondary students and is concerned that girls may be less likely than boys to enroll in the course, might indicate how it intends to conduct "outreach" efforts to girls, to encourage their enrollment.

(4) An applicant that proposes a project to increase school safety might describe the special efforts it will take to address concerns of lesbian, gay, bisexual, and transgender students, and efforts to reach out to and involve the families of LGBT students.

We recognize that many applicants may already be implementing effective steps to ensure equity of access and participation in their grant programs, and we appreciate your cooperation in responding to the requirements of this provision.

The Wisconsin Department of Public Instruction has electronic versions of the GEPA assurances digitally signed by district administrators and independent charter school administrators. Additionally, to ensure consistency with the ESSER I and ESSER II applications, LEAs will be required to provide a description of the steps the LEA proposes to take to ensure equitable access to, and participation in, its Federally assisted program for students, teachers, and other program beneficiaries who may experience any of these barriers: gender, race, national origin, color, disability, and age as required under GEPA Section 427.

Estimated Burden Statement for GEPA Requirements

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. Public reporting burden for this collection of information is estimated to average 3 hours per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The obligation to respond to this collection is required to obtain or retain benefit (Public Law 103-382). Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the U.S. Department of Education, 400 Maryland Ave., SW, Washington, DC 20210-4537 or email ICDocketMgr@ed.gov and reference the OMB Control Number 1894-0005.