From:	Kinney, Alice
To:	Adams, Laura L. DPI; ESSERF
Cc:	OESE.SGR.Wisconsin; Lee, Alanna R. DPI; Jones, Keona S. DPI
Subject:	RE: Request for Extension - S425U210044 - Wisconsin ARP ESSER State Plan Feedback
Date:	Wednesday, October 6, 2021 2:41:51 PM

CAUTION: This email originated from outside the organization.
Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Laura,

As I mentioned earlier this week, I am now reaching out with additional feedback regarding sections D.1, D.2, and D.3 of Wisconsin's ARP ESSER State Plan. Wisconsin will need to address all of the feedback before the U.S. Department of Education (Department) can proceed with next steps.

We recognize that your team has worked to update Wisconsin's ARP ESSER State plan to address our first round of feedback and plans to resubmit today, October 6. Since we are now providing feedback specific to sections D.1, D.2, and D.3 we are happy for you to either:

- Proceed with submitting your new version today as planned and begin working to address the feedback below. Then, resubmit an additional plan that addresses the feedback for sections D.1, D.2, and D.3 by October 13; or
- Hold on submitting your new version today and instead continue to edit it to include updates that address the feedback below. Then, resubmit a plan by October 13 that includes updates to all sections that feedback has been provided on.

Please note, regardless of which option is selected above, the U.S. Department of Education ARP ESSER review team will work to re-review any resubmissions and may provide additional feedback that requires further drafts to be submitted. Please let me know if your team will need any additional time to address these new items. We ask that you submit both a red-lined/track changes version of your ARP ESSER State plan, as well as a clean version with an updated signature and date that can be posted on the Department's website. As mentioned before, we are always happy to schedule a call to discuss the items listed below in more detail if that would be helpful. If so, please provide a few times when you'd be available, and we will work to accommodate your schedule,

Section D Feedback

Section D.1 of the ARP ESSER State plan template requires the SEA to describe how it will use the funds it reserves under section 2001(f)(1) of the American Rescue Plan Act of 2021 (ARP) (totaling not less than 5 percent of the State's total ARP ESSER allocation) for evidence-based interventions and activities to address the academic impact of lost instructional time. Section D.2 of the ARP ESSER State plan template requires the SEA to describe how it will use the funds it reserves under ARP section 2001(f)(2) (totaling not less than 1 percent of the State's total ARP ESSER allocation) for evidence-based learning and enrichment activities during the summer. Section D.3 of the ARP ESSER State plan template requires the SEA to describe how it will use the funds it reserves under section 2001(f)(3) of the ARP (totaling not less than 1 percent of the State's total allocation of ARP ESSER funds) for evidence-based comprehensive afterschool programs.

On page 27 of the Wisconsin ARP ESSER State plan, Wisconsin states that it will allocate its state reservations 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."

1. Wisconsin has described its planned uses of the funds it reserves throughout multiple sections and subsections of D.1, D.2, and D.3 without distinguishing among the specific required reservations. When revising the Wisconsin ARP ESSER State plan, please separate these descriptions so that section D.1 refers only to evidence-based interventions and activities that address the academic impact of lost instructional time; section D.2 refers only to evidence-based summer learning and enrichment activities; and section D.3 refers only to evidence-based comprehensive afterschool programs.
2. 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 SEA has indicated that this directive would likely exclude significant numbers of underserved students across the State from receiving much-needed services, including students in the State's five largest urban school districts (Milwaukee, Madison, Racine, Green Bay, and Kenosha). These five districts serve more than 30 percent of the State's economically disadvantaged students and nearly 70 percent of the State's Black students. As stated in the Department's June 30, 2021 letter, these directives, as described, appear to exclude certain LEAs from receiving the benefit of these ARP ESSER State reservations without regard for the "disproportionate impact" of the COVID-19 pandemic on underserved populations that section 2001(f)(1) requires SEAs to serve. Please clarify if the Department's understanding of Wisconsin's intended uses of funds it reserves under section 2001(1) of the ARP is correct. If so, as indicated in our June 30th letter, the proposed use of these funds does not appear to meet statutory requirements.
3. In addition, the JCF is requiring Wisconsin to limit eligibility for support under Wisconsin's summer enrichment and afterschool programs reservations under section 2001(f)(2) and (3) of the ARP to LEAs eligible for State sparsity aid. On page 28 of the Wisconsin ARP ESSER State plan, Wisconsin states that "to support those students with the greatest needs as a result of the COVID-19 pandemic with the competitive grants funded by the ESSER III state set-aside, the SEA will review relevant student data reported by LEAs to the statewide data collection system, known as WISEdata, including student demographics, attendance, chronic absenteeism, and achievement data in order to identify groups most impacted by the COVID-19 pandemic. This information will be used to determine eligibility benchmarks for LEAs who are eligible and choose to apply for these competitive grants." It is unclear how Wisconsin plans to determine eligibility benchmarks for LEAs and how these benchmarks may affect the eligibility requirements and the competition itself. For section D.2 and D.3, please describe:
    - How limiting the competitive grants to only those school districts that were eligible to receive a sparsity aid payment in fiscal year 2021 is consistent with the requirement to meet the needs of students that were disproportionately impacted by COVID-19;

- How WPDI will require LEAs that receive funds to support the student groups that were disproportionately impacted by COVID-19; and
- If there will be a meaningful opportunity for *all* LEAs to receive funds under Round 2 of the competitive grants.

4. Wisconsin states that it plans to allocate $2.4 million to specific state schools and one charter school and $5 million for prescribed reading initiatives. Please clarify which funds Wisconsin will use to fund these initiatives (e.g., section 2001(f)(1)) and describe how Wisconsin will ensure that these initiatives meet the needs of student groups that were disproportionately impacted by COVID-19.
5. While an SEA may reserve up to one half of one percent (.5%) of its total ARP ESSER allocation for administrative costs, it may not take this amount from the required state reservations (e.g., an SEA may not take .5% from the 5% for the academic impact of lost instructional time and only reserve 4.5% for the academic impact of lost instructional time. In its resubmission, Wisconsin must update this language to reflect that the up to one half of one percent (.5%) of its total ARP ESSER allocation for administrative costs does not come out of the required state reservations in D.1, D.2., or D.3.

Best,

Alice Kinney

Program Officer, Rural Education Achievement Program (REAP)
Office of Elementary and Secondary Education
U.S. Department of Education
202-453-5811 | alice.kinney@ed.gov

From: Kinney, Alice
Sent: Wednesday, September 29, 2021 11:06 AM
To: Adams, Laura L. DPI <Laura.Adams@dpi.wi.gov>; ESSERF <ESSERF@ed.gov>
Cc: OESE.SGR.Wisconsin <Wisconsin.oese@ed.gov>; Lee, Alanna R. DPI <Alanna.Lee@dpi.wi.gov>; Jones, Keona S. DPI <Keona.Jones@dpi.wi.gov>
Subject: RE: Request for Extension

Good morning and thank you for reaching out about this. Your suggested extension deadline of October 6th works for our team. We also hope to provide additional feedback on sections D1, D2, and D3 in the coming days so keep an eye out for that email in the meantime. Please let me know if you have any questions.

All the best,

Alice Kinney

Program Officer, Rural Education Achievement Program (REAP)
Office of Elementary and Secondary Education

U.S. Department of Education
202-453-5811 | alice.kinney@ed.gov

Visit the new REAP website today!

From: Adams, Laura L. DPI <Laura.Adams@dpi.wi.gov>
Sent: Wednesday, September 29, 2021 8:58 AM
To: ESSERF <ESSERF@ed.gov>
Cc: Kinney, Alice <alice.kinney@ed.gov>; OESE.SGR.Wisconsin <Wisconsin.oese@ed.gov>; Lee, Alanna R. DPI <Alanna.Lee@dpi.wi.gov>; Jones, Keona S. DPI <Keona.Jones@dpi.wi.gov>
Subject: Request for Extension

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning Alice, Denise, and colleagues at USDE. Wisconsin is respectfully requesting an extension for submitting our initial revisions to our state ESSER III plan in order to have enough time for those revisions to be reviewed by appropriate internal staff. We are requesting an extension of Wednesday, October 6.

Thank you for your consideration,

Laura

Laura L. Adams
Literacy Consultant
Wisconsin Department of Public Instruction
(608)267-9268
laura.adams@dpi.wi.gov

Follow us on Twitter
http://twitter.com/WisDPILit