



Re: Equitable Use of COVID-19 Emergency Relief Funds

Dear Governors and State Superintendents and Education Commissioners:

This letter is submitted on behalf of the Intercultural Development Research Association (IDRA), an independent, nonprofit organization whose mission is to achieve equal educational opportunity for every child through strong public schools that prepare all students to access and succeed in college. IDRA operates the [IDRA EAC-South](#), which is the federally funded equity assistance center that provides technical assistance state education agencies and school districts in 11 states in federal Region II and Washington, D.C. (covering most of the U.S. South).

In the coming weeks, states will receive federal relief funds through the Coronavirus Aid, Relief and Economic Security (CARES) Act to support their response to the COVID-19 crisis. As you respond on behalf of the students and families in your state, we ask that CARES Act and additional relief funds for schools and students be allocated equitably to address the unique learning needs of students from marginalized communities.

We further request that a plan for the proposed use of these funds be made available to the general public and that you create opportunities for students, families and advocates to have meaningful input into the plan for how these funds shall be distributed and used.

Finally, we ask that your state education agency create working groups or task forces to assist in addressing the particular funding needs of the special populations mentioned herein. Know that the IDRA EAC-South can be a free resource support to these groups as we have served in this advisory capacity throughout the South.

As you consider how funds are spent out of the Governor's Emergency Education Relief Fund and the Elementary and Secondary School Emergency Relief Fund, the recommendations below may aid you in ensuring educational equity, particularly in your consideration of Part C of the Certification and Agreement for Funding out of the Governor's Emergency Relief Fund.

Specifically, the recommendations relate to remote instruction for students with the greatest needs (Part C1a), students with disabilities, students from low-income families (Part C1b), English Learners, racial and ethnic minorities, students experiencing homelessness, and students in foster care (Part C2a). These recommendations also may inform local education agencies as they consider Part D4 of the Elementary and Secondary School Emergency Relief Fund Certification and Agreement for Funding application, which requires an explanation for how inform local education agencies will provide services that permit students, teachers and other program beneficiaries to overcome barriers (including barriers based on gender, race, color, national origin, disability and age) that impede equal access to, or participation in, the program.

Recommendations

Target Funds Equitably: The COVID-19 pandemic has exposed and exacerbated many educational inequities long felt by students of color, English learners, students from families with limited incomes, immigrant students, and students experiencing homelessness, among others. Emergency relief funds should be targeted to meet the needs of the student groups most impacted by the inequities that are being amplified by the pandemic. COVID-19 emergency policies and relief funds should be used to:

- Provide the equipment, connectivity services, and technical training that students and families need to engage in at-home learning, especially in rural communities with more limited access to internet;
- Ensure compensatory and remedial education services for students to mitigate the impact of school closures on academic success;
- Provide [resources and services for English learners](#) and their families, including progress assessments, translated materials and access to multiple modes of learning;
- Increase resources for community colleges that may not receive the funds they need due to the funding formulae in the CARES Act;
- Increase funding for programs in the Every Student Succeeds Act and other federal education laws that were created to address inequities and meet the educational needs of English learners, students of color, students from families with limited incomes, and others; and
- Limit requests for waivers of federal law to those that are absolutely necessary to address the immediate needs of the people in your state and ensure those waivers do not harm students and families.

Connect Students and Families to Supports and Services: Local education agencies (LEAs) and institutions of higher Education (IHEs) meet many of the life needs of students and families, including through mental health supports, nutritional services and childcare services. COVID-19 emergency policies and relief funds should be used to:

- Increase access to counselors, social workers, and other mental health professionals and reliable telemedicine services that can provide critical care and service referrals to students, families, and educators; and
- Provide food and healthcare to students and families, through direct payments, nutritional support programs like the Pandemic Electronic Benefit Transfer Program, meal services and transportation supports.

Ensure Accountability and Transparency: Recipients of emergency funds must be held to accountability and transparency standards, even as they are given some flexibility to spend funds quickly to meet the needs of their communities. Accountability and transparency measures should include requirements that the governor and state education agencies distribute funds equitably and use emergency funds to supplement, not supplant, state school funds. Recipients should detail distribution criteria, use of funds, and transparency and accounting measures. This is a critical part of mitigating the [dire impact](#) that the COVID-related economic downturn will likely have on school funding systems.

Foster Family Connections to Schools: Schools should always work to ensure deep and meaningful engagement with families. That engagement is now more important than ever, especially as education agencies identify ways to address extended lost learning time. Schools

must be able to communicate with students and families, even as they comply with social distancing requirements. COVID-19 emergency policies and relief funds should be used to:

- Support programs to locate and communicate with students and families who have not had contact with their schools since closures began; and
- Fund student and family support liaisons who are solely tasked with performing student and family well checks, surveying family needs, and sharing critical policy and practice updates with families.

Plan for the Next School Year: In addition to supporting the immediate needs of students, schools must begin to plan for the next phases of educating students. COVID-19 emergency policies and relief funds should be used to:

- Develop non-punitive diagnostic assessment systems and training so that teachers can determine the extent of student learning during school closures; and
- Support statewide planning for educational continuity, including summer learning, compensatory education, and remedial education plans, especially for students of color, English learners, students from families with limited incomes, immigrant students, students experiencing homelessness, and students in the juvenile justice and foster care systems.

Again, thank you for your consideration and the work you are doing to address the COVID-19 crisis. IDRA's research, policy, data science and professional development experts are available to support your efforts to support students, families and schools during the COVID-19 crisis. Please contact me should you have any questions.

Sincerely,

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The Intercultural Development Research Association is an independent, non-profit organization, led by Celina Moreno, J.D. Our mission is to achieve equal educational opportunity for every child through strong public schools that prepare all students to access and succeed in college. IDRA strengthens and transforms public education by providing dynamic training; useful research, evaluation, and frameworks for action; timely policy analyses; and innovative materials and programs.