



Celina Moreno, J.D.
President & CEO

The Honorable Nancy Pelosi
Speaker of the House
United States House of Representatives
Washington, D.C. 20515

The Honorable Kevin McCarthy
Minority Leader
United States House of Representatives
Washington, D.C. 20515

The Honorable Mitch McConnell
Majority Leader
United States Senate
Washington, D.C. 20510

The Honorable Charles Schumer
Minority Leader
United States Senate
Washington, D.C. 20510

Chairman Bobby Scott
Committee on Education and Labor
United States House of Representatives
Washington, DC 20515

Chairman Lamar Alexander
Committee on Health, Education,
Labor, and Pensions
United States Senate
Washington, DC 20515

July 27, 2020

Re: COVID-19 Emergency Relief Funding for Public Education

Dear U.S. House of Representatives and U.S. Senate Leaders:

This letter is submitted on behalf of the Intercultural Development Research Association (IDRA), an independent, non-profit 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.

We write to urge you to increase funding for elementary, secondary, and postsecondary schools and target that funding equitably in the next federal COVID-19 emergency relief package. Additionally, we urge you to ensure critical protections for the students and public schools most impacted by the pandemic and the systemic inequities that have been worsened by it.

Increased Funding for Elementary, Secondary, and Postsecondary Schools

Emergency relief funding for schools must be increased to address budget crises that schools and state and local governments are facing and to meet new and ongoing COVID-related needs.

Addressing budget shortfalls that impact education systems: Experts have projected more than \$550 billion in state budget shortfalls between FY 2020 and FY 2022.¹ In Texas, the state comptroller recently estimated a \$4.6 billion state budgetary shortfall by the end of FY 2021, which may not completely account

¹ McNichol, E., & Leachman, M. (July 7, 2020). [States Continue to Face Large Shortfalls Due to COVID-19 Effects](#), Center for Budget Policy Priorities.

for additional economic losses should the rates of infection in the state continue to be as high as they are currently.² Similarly, state and local governments across the U.S. South are anticipating significant financial losses, which will impact school district budgets, especially those in low-income communities that rely heavily on state monies to fund schools.³

The next stimulus package should dedicate sufficient funds for education agencies to meet their budget needs, while ensuring states continue to meet their education funding obligations through strong maintenance of effort requirements. Should they need to reduce education funding, states should be required to adopt procedures to make those cuts equitably, prioritizing the needs of students from families with limited incomes, English learners, students with disabilities, students experiencing homelessness, and others who most need resources in their schools.

The next stimulus package should also provide additional funds for federal programs that support traditionally-underserved groups that will be hardest hit by reductions in state and local funding. We urge you to increase funds for programs in the Every Student Succeeds Act, including Title I for economically disadvantaged students and Title III for English learners. We also urge you to meet federal funding commitments established in the Individuals with Disabilities Education Act (IDEA) for the educational needs of students with disabilities.

Addressing the digital divide: The pandemic has revealed and worsened significant differences in access to connectivity (i.e., broadband connections and hotspots), devices and digital programs (i.e., tablets, computers, smartphones, and platform licenses), and digital knowledge and training.⁴ Those most likely to have limited access include communities of color, rural communities, and low-income communities.⁵ Because many students and families may have to navigate distance learning for significant portions of the school year, it is critical that emergency relief funds be dedicated to addressing the digital divide for communities and students.

Addressing significant learning loss: Pandemic-related school closures have resulted in lost academic and social time for students. This learning loss must be addressed with additional resources for tutors, non-punitive assessment systems, compensatory services, additional classroom days, and other responsive programs. Some estimates show a nationwide cost of \$36 billion just to extend learning time to address losses due to school closures.⁶ Specific emergency funds must be set aside for learning recovery efforts, with an emphasis on the use of non-punitive assessments to identify learning loss and measure progress over time.

Ensuring the physical and mental health and safety of students and teachers: Funds should be appropriated for protecting the health and safety of students, particularly if their schools are in communities with high rates of COVID-19 infection. Schools will have costs associated with virus testing, masks, classroom shields, and other protective equipment. Additionally, there will be costs associated

² Texas Office of the Comptroller. (July 20, 2020). [Texas Comptroller Glenn Hegar Projects a Fiscal 2021 Ending Shortfall of \\$4.6 Billion in Revised Revenue Estimate](#), press release. Austin, Texas.

³ Wilson, T. (Mar. 22, 2020). [Without Intervention, COVID-19-Induced Budgetary Shortfalls Will Fall Hardest on Marginalized Students in the South](#). Intercultural Development Research Association.

⁴ See Goldstein, D. (June 5, 2020). [The Class Divide: Remote Learning at 2 Schools, Private and Public](#), The New York Times.

⁵ KewalRamani, A., et al. (2018). [Student Access to Digital Learning Resources Outside of the Classroom](#). National Center for Education Statistics.

⁶ Leachman, M. (June 15, 2020). [To Support Education, Congress Should Provide Substantial Fiscal Relief to States and Localities](#), Testimony before the House Committee on Education and Labor.

with ensuring sufficient counseling and social work supports for students and families who need supports or are experiencing trauma associated with the virus, loss of jobs, social isolation, and the most recent acts of violence against Black people by law enforcement. Many schools across the country are currently not meeting recommended students-to-counselor, student-to-social worker, and student-to-nurse ratios. Funds should be dedicated to increasing the presence of mental, physical, and behavioral health professionals, who are critical to ensuring safe and supportive school environments and addressing the many effects of the pandemic.

Providing additional higher education financial aid grants: The CARES Act allocated funds for Institutions of Higher Education (IHEs) and required that a majority of funding be used for emergency financial aid grants for students. The grants were intended for students who most need funds to address the costs associated with school closures, including instructional materials, food, and healthcare services. IHEs need additional emergency funding, with some groups recommending at least \$46 billion in the upcoming stimulus package.⁷ We urge you to allocate this funding and ensure that distribution formulae are updated to target more funds at community colleges, whose part-time, working students were not adequately supported in the CARES Act.

Protections for Students and Public Schools

In addition to increasing funding for schools, we urge you to ensure protections for students and public schools including through clarifications of the intent and appropriate application of certain provisions of the CARES Act. Specifically, we ask you to include language related to the following protections.

Family engagement: Families must be involved in decisions that impact students, including how emergency education funds are spent in their schools and districts. Recipients of federal funds – including emergency relief funds – must sign assurances promising they will involve families in spending decisions.⁸ Families can provide important information and guidance that can ensure the effective and efficient use of funds, including for digital devices, instructional materials, communication methods, and other needs. Communication between schools and families, particularly families of color and families with limited incomes is insufficient in many communities and has been made worse due to COVID-19-related school closures.

Many school districts have reported completely losing contact with families in their districts since the pandemic began, indicating a need for a stronger engagement infrastructure.⁹ We urge you to affirm family engagement requirements for emergency fund recipients and to dedicate funding for schools to ensure consistent and authentic engagement with families through parent support specialists, translation services, and multi-modal communication methods that enable families without internet services to remain connected to their schools.

Reopening requirements: Federal funds should not be tied to in-person learning requirements. Many teachers, school leaders, parents, students, and public health experts agree that schools should reopen as soon as they are able for in-person learning because of the clear academic and social benefits they can

⁷ Miller, B. (May 11, 2020). [A Better Formula for Higher Education's Federal Coronavirus Funding](#). Center for American Progress.

⁸ See IDRA. (April 17, 2020). [Update: The CARES Act and Federal COVID-19 Actions](#). Intercultural Development Research Association.

⁹ See Cueto, I. (July 3, 2020). [SC schools haven't been able to reach 16,000 students during COVID-19 outbreak](#), The State. See also Webb, S. (May 11, 2020). [Thousands of Houston-area students lose contact with schools during pandemic shutdown](#), The Houston Chronicle.

provide to students. However, schools should not be forced to reopen before it is safe to do so and that determination should be based on the rates of infection in the community and the recommendations of public health experts, teachers, and families who are familiar with the community. Tying the receipt of critical federal funds to school reopening decisions would have harmful impacts on the communities – like many across the U.S. South – that need the funds for their students and teachers, but for which in-person learning in the fall is not a safe option.

Equitable services: The U.S. Department of Education has erroneously interpreted the CARES Act to require some school districts to reserve more relief funds for private schools in their district boundaries.¹⁰ An analysis by IDRA revealed that the Department’s interpretation of the CARES Act may require Texas schools to reserve an additional \$38 million in much-needed relief funds for private schools within their boundaries.¹¹ We urge you to clarify that the equitable services reservations in the CARES Act and subsequent relief packages should be made in accordance with the distribution rules in the Every Student Succeeds Act, which provide services to private school students based on financial need.

Discretionary spending: The CARES Act provided discretionary funds for distribution by the Department of Education. The Department chose to devote some funds to “microgrants,” a voucher program that gives relief funds to individual families for technology, tutoring and other programs.¹² Additionally, the Trump administration has expressed support for setting aside subsequent emergency relief funds for tax credit scholarship programs that would provide tax incentives to individuals and business that donate to programs that provide funds for individual students to attend private schools.¹³ Programs like microgrants and tax credit scholarships take funds from the schools and students who need them most and have no place in an emergency relief bill. The stimulus package must limit the power of the Department of Education to divert critical emergency funds from public schools toward private institutions and individual families.

Application of higher education financial aid grants: The Department of Education has misinterpreted CARES Act higher education financial aid grants and issued an interim final rule limiting the scholarships to students based on citizenship status.¹⁴ This interpretation excludes undocumented college students, including DACA recipients, from receiving much-needed resources to pay for books and other instructional materials, food, and health care. Stimulus monies are meant to provide critical supports to the students and families who most need them and who are disproportionately impacted by the pandemic. Undocumented students must not be excluded from this relief. IHEs should be able to distribute federal funds to their students without the unreasonable and arbitrary limits put in place by the Department of Education.

Thank you for your work for students and the urgency with which you do it. Should you have any questions about the recommendations above, please refer to IDRA’s regularly-updated guide to ensuring equity

¹⁰ See U.S. Department of Education. (July 1, 2020). [Interim Final Rule for CARES Act Programs; Equitable Services to Students and Teachers in Non-Public Schools.](#)

¹¹ Craven, M., & Johnson, R. (July 16, 2020). [Cutting Public School Relief Funds to Subsidize Private Schools.](#) Intercultural Development Research Association.

¹² See U.S. Department of Education. [Education Stabilization Fund Discretionary Grants.](#)

¹³ See Blad, E. (July 2, 2020). [Trump Team Signals Support for More School Relief, Private School Choice Plan,](#) Education Week.

¹⁴ See U.S. Department of Education. (June 17, 2020). [Interim Final Rule for Eligibility of Students at Institutions of Higher Education for Funds under the Coronavirus Aid, Relief, and Economic Security Act.](#)

during and after COVID-19¹⁵ and do not hesitate to contact Morgan Craven, IDRA National Director of Policy, Advocacy, and Community Engagement at morgan.craven@idra.org.

Sincerely,

Morgan Craven, J.D.

National Director of Policy, Advocacy, and Community Engagement

IDRA (Intercultural Development Research Association)

¹⁵ IDRA. [Ensuring Education Equity During and After COVID-19](#), A Guide with Phased Policy Recommendations. Intercultural Development Research Association.