

April 24, 2020

Dear Governor Polis:

We are a diverse group of 16 organizations working with and on behalf of Colorado K-12 students and their families. We represent policy and advocacy organizations and groups serving educators, students and families. We are aware that the Coronavirus Aid, Relief, and Economic Security (CARES) Act established the Governor's Emergency Education Relief (GEER) Fund, through which Colorado is eligible to receive \$44 million for flexible grants to local education agencies (LEAs - including school districts, public charter school networks, and individual public charter schools), institutions of higher education (IHEs), and other education-related entities that are providing critical education services and emergency assistance to students and families in these challenging times.

With your significant discretion over these funds, we ask that you lead our state and the country in using an equity lens to determine how best to deploy them for emergency support. Educational equity means that "each child receives what they need to develop to their full academic and social potential."¹ With such a limited pool of resources, and such great need across Colorado in this moment, it is vital that resources are targeted to make the biggest difference for kids. To a great extent, this will mean interrupting inequitable practices that exist in our current system of resourcing schools and students.

In establishing a process for distributing GEER funds to K-12 education entities, we ask that you:

1. Ensure that the limited GEER funds are targeted to serve the students who are below proficiency and most chronically under-supported in our current system by establishing eligibility criteria that account for student need *and* a school or district's lack of ability to raise additional funds to meet those needs;
2. Ensure that GEER funds are spent on effective, proven strategies for learning and support that will be valuable to students and families;
3. Ensure that the proper transparency and reporting mechanisms are in place so that GEER funds reach the intended students and to make learning about best practices possible; and
4. Establish an equity task force to provide ongoing thought partnership and oversight over how GEER funds and other federal stimulus dollars are distributed and spent.

The COVID-19 crisis and accompanying school closures have laid bare the profound inequities in the lives of children that impede their school success. But the pandemic, for all its horrible consequences, has also stimulated innovative thinking and forced a new look at existing structures and fault lines. It is more important than ever to strive to create an educational system where (1) historic barriers of racism, class and discrimination do not determine any child's opportunity to succeed, and (2) every child in Colorado has access to the resources, teachers, interventions and supports that they need to be successful.

The following pages contain details on our rationale for the above recommendations, suggestions for implementation, and a list of the organizations that support these ideas. While we recognize that GEER funds can be spent across the entire spectrum of education, and that need exists among our higher education partners in the state, our recommendations are based on the knowledge and lived experience of this group of organizations and the broad networks with whom we work, and therefore focus on how these funds could be best utilized for K-12 purposes.

¹ National Equity Project. "Why Equity?" Accessed at: <https://nationalequityproject.org/about/equity>.

Recommendation #1: Ensure that the limited GEER funds are targeted to serve the students who are below proficiency and most chronically under-supported in our current system by establishing eligibility criteria that account for student need and a school or district's lack of ability to raise additional funds to meet those needs.

Certain student populations historically have been and continue to be underserved and under-supported by our education system, including but not limited to: children living in poverty, children of color, children with disabilities, emerging bilingual children, children in undocumented or indigenous families, children in foster care, children facing homelessness, children who identify as LGBTQ, children in the juvenile justice system, and children whose identities span two or more of these identities.

The pandemic and associated school closures have exacerbated barriers to equitable access and participation for students across all of these categories, putting them at risk of falling further behind or of becoming disconnected from school altogether. Our concern that our students in these groups will fall further behind their peers during school closures is borne out by research.² Further, the disproportionate impact of COVID-19 on communities of color compounds these factors. Here in Colorado, as is too often the case when a crisis hits our state or country, our Black/African American, Hispanic and Native Hawaiian/Pacific Islander communities are facing the worst impacts.³

In distributing GEER funds with an equity lens, it is crucially important that criteria for eligibility prioritize student needs and a school or district's lack of ability to raise additional funds to meet those needs. We believe that GEER funding will have the greatest impact in communities serving students with the most barriers to opportunity and communities that perpetually struggle to find adequate funding to meet student needs. Equally important, districts receiving funds should be strongly encouraged to allocate funding to schools in a way that targets resources based on these student characteristics.

We urge you to prioritize the following *student needs* in eligibility criteria for GEER funds:

- LEAs educating high percentages of students living in poverty. The pandemic has put disproportionate stress on high-poverty schools and districts as they have had to move quickly to implement distance learning plans and ensure that students have basic resources including meals, technology and social-emotional supports.
- LEAs educating high percentages of emerging bilingual students, who receive specialized support and instruction when they are in the classroom and whose family members may not be able to help them without assistive technology or translation. Additionally, students from immigrant or undocumented families are at greater risk if their families are unable to access federal relief funds or services, and now face additional anxiety about deportation. We know that these concerns can cascade into additional mental health and economic security concerns.
- LEAs educating high percentages of students facing multiple barriers to opportunity listed above.
- LEAs whose communities have been particularly hard hit by COVID-19, where students and their families may increasingly be in unstable situations.

² [One study](#) has found that funding cuts imposed on schools by the Great Recession were associated with measurable declines in student math and reading scores, declines that grew over multiple years and that were felt most acutely in school districts serving predominantly low-income and minority students. [Another](#) examined the impact of economic slumps on academic performance and found that widespread job loss negatively affects student mental health, leading to lower test scores. The effects were felt throughout the communities studied, such that even students whose own parents weren't laid off saw declines in achievement.

³ Colorado Public Radio. "[Coronavirus is statistically more prevalent among racial minorities in Colorado.](#)" April 13, 2020.

We also urge you to prioritize *lack of capacity to raise additional local funds* in the eligibility criteria: LEAs with the lowest property wealth and/or ability to raise local funds (through mill levy overrides or local public school foundations⁴) to support students. In the absence of a statewide solution to our education funding challenges, districts have increasingly turned to 178 local solutions by leaning on local voters and philanthropy. This means that the amount of dollars available to invest in Colorado's students varies significantly between districts due to the state's wildly outdated school funding formula, and also due to local property wealth and voters' ability to invest more in education. Existing local capacity must be taken into account to ensure that GEER funds go where they are most needed.

Funds must be distributed in a manner where they will make a meaningful impact, but no single or select group of LEAs should receive a majority of funds. As such, we suggest that no participating LEA receive a distribution that equates to more than 10 percent of the total funds. Investments per student should be significant enough to make an impact as well.⁵

Public charter school networks and individual charter schools are eligible to apply for these funds. Based on the criteria above, we encourage you to determine a fair percentage to set aside for eligible charters.

Recommendation #2: Ensure that GEER funds are spent on effective, proven strategies for learning and support that will be valuable to students and families.

After determining where GEER funds will make the most impact, it is also important to prioritize how GEER funds will be deployed by schools and districts to make the biggest difference for students. LEAs should be incentivized to innovate – not fill budget holes. We encourage you to prioritize the following:

- Programs (including summer school, after-school, and out-of-school programs) that provide additional, targeted academic supports, interventions, and/or remediation to mitigate or make up for lost learning time with tailored student supports in the summer and fall.
- Programs (including summer school, after-school, and out-of-school programs) that provide wraparound supports to address trauma and social-emotional needs related to the crisis, including supporting chronically absent students who may need to be reengaged.
- Programs and practices that strengthen family engagement, such as interpretation and translation services, compensation for educators and other school staff who spend extra hours doing family outreach, and development of parent-friendly resource-sharing platforms.⁶
- Compensated teacher experiences to provide support and training in how to deliver virtual instruction in creative, engaging and meaningful ways and how to plan for tiered supports when kids return in the fall. Funds could also be used to compensate teachers differently, such as providing a robust extension of the school year or school day for targeted populations during the 2020-21 school year or providing compensation bonuses in schools with the greatest needs.
- Incentives that honor the ways that communities come together to provide critical services to students and families by acknowledging that non-profit and direct service organizations, out-of-school learning providers, institutions of higher education and supplemental online programs like Colorado Digital Learning Solutions work in partnership with schools and districts. Coordination and

⁴ The [Colorado School District Needs Inventory](#) includes recent data on local school district foundations, slide 47.

⁵ [Studies](#) have shown that meaningful additional investments per student, spent in targeted ways, can improve student outcomes. Based on Colorado's base per pupil funding, filling a learning gap of 80 hours would cost ~\$515.

⁶ Family engagement was the fourth-highest education "top need" cited by district leaders in the needs assessment survey, at 38 percent. "Online instructional supports for teachers" ranked third at 41 percent, "technical supports for delivering remote learning," ranked second at 46 percent, and "student emotional support" ranked first at 52 percent.

collaboration among all of the various entities that serve kids should be encouraged in LEA plans for how to use GEER funds.

Effective access to internet and distance learning technology is a baseline need for all students. The recent needs assessment survey conducted by the Colorado Department of Education and the Colorado Education Initiative estimated that 52,918 students lack access to a wi-fi enabled device (six percent of the student population), and that an estimated 65,860 students lack access to internet at home (eight percent of the student population).⁷ These are needs that we know schools and districts are working to address quickly. Because hardware, software, and connectivity related to educational technology are allowable uses for the Elementary and Secondary School Emergency Relief (ESSER) funds that Colorado will receive, we do not recommend that these uses be prioritized in the distribution of GEER funds.

Recommendation #3: Ensure that the proper transparency and reporting mechanisms are in place so that GEER funds reach the intended students and to make learning about best practices possible.

It is important to minimize the burden that would be imposed on schools and districts to develop a plan for how they will use GEER funds. The process by which LEAs prove their eligibility for GEER funds should be simple, and approvals should be granted as soon as possible.

At the same time, we believe it is necessary that any eligible LEA or entity accepting these funds commit to prioritizing equity for students who face the greatest barriers at the center of any plan for the use of the new funds. This could be done in a number of ways:

- By demonstrating, with specificity, how the LEA plan targets the GEER funds to schools with the highest proportion of students in the groups listed above;
- By demonstrating, with specificity, how the LEA plans to use the GEER funds on approaches that are reasonably expected to have the greatest impact on reducing education inequities during school closure, over the summer, and once schools re-open, and;
- By providing maximum transparency on planned uses for the GEER funds (posting plans on LEA websites in languages accessible to students/families in the district).

Reporting on how funds were expended to reduce educational inequities should also be a basic requirement for LEAs. Final reports on distribution and spending (at the LEA and state levels) must track and publicly report on whether funds reached targeted students, ensuring funds were utilized as expected and determining where investments made a difference.

We know that the limited GEER funds will not cushion the blow of a coming economic recession, and many more difficult decisions will need to be made about how to mitigate the impacts of the COVID-19 crisis on students and schools. As such, ***we request that you establish an equity task force to provide ongoing thought partnership and oversight over how GEER funds and other federal stimulus dollars are distributed and spent.*** In selecting members to serve on such a task force, it will be important to include community partners, including students, parents, and those working most closely with them.

Thank you for the opportunity to share these recommendations. We look forward to continued collaboration to find solutions that drive towards equity and result in the best possible outcomes for Colorado's children in these extraordinary times.

⁷ CDE and CEI. [Colorado School District Needs Inventory](#). April 17, 2020, slides 29-35.

Respectfully (organizations signed on as of 5:00pm on Friday, April 24, 2020),

A+ Colorado

African Leadership Group (ALG)

Climb Higher Colorado

Colorado Children's Campaign

Colorado Latino Leadership, Advocacy, & Research Organization (CLLARO)

Colorado Succeeds

Colorado Youth Congress

Democrats for Education Reform

Education Reform Now

Public Education and Business Coalition (PEBC)

Stand for Children Colorado

Teach For America Colorado

Teach Plus Colorado

Transform Education Now (TEN)

Our Turn Colorado

Young Aspiring Americans for Social & Political Activism (YAASPA)

CC: Dr. Katy Anthes, Colorado Department of Education Commissioner
Allie Kimmel, Senior Policy Advisor to Gov. Jared Polis