



June 3, 2020

NJ Department of Education
Trenton, NJ 08625

To Whom It May Concern:

I am writing on behalf of the SPAN Parent Advocacy Network (SPAN) to indicate our support for, and concerns and recommendations regarding, NJ's ESSER plan. There are many aspects of the plan that we support wholeheartedly and areas where we strongly recommend revisions. We were pleased to participate in a recent stakeholder conversation with the NJ Department of Education (Department) where we shared some of our specific concerns and recommendations.

Major Concerns

Compensatory Education Services: We are disappointed there are no funds designated for supporting compensatory education/services for students who went without IEP services for most if not all of the past year. Compensatory education services must be specifically addressed in the plan and must correct the omissions in the most recent guidance from the Department.

CBO Partnerships: The plan needs more specifics regarding partnering with community based organizations to increase/improve access to services for families, especially underserved communities where the school might not be seen as a source of support. There should be examples of activities CBOs can engage in/lead in collaboration with schools/districts, including examples of MOUs/contracts. In particular, this would be helpful in terms of partnering with CBOs who can offer mental health services and supports to children, families, and staff.

Family Engagement: The plan must include a great deal more about family engagement activities across all of the uses to which funds can be applied. Given the increased level of parent involvement in student learning during the pandemic, there is insufficient discussion about effective family engagement strategies throughout the plan. Further, Section B requires that LEAs review and revise the Safe Return Plan at least every 6 months. Families of the full range of diverse students – students with disabilities, LEP students, low income students, students of color, etc. – must be a part of this process and all information and updates must be made public and easily accessible to families, students, staff, and the community.

TA Teams: The idea to have regional Training/TA teams via contract with IHEs can help address the reality that staffing in the Department is insufficient to meet the TA demand. However, even with these teams, the need may well far exceed the capacity. Further, the expertise for meaningful, authentic family engagement is not housed within IHEs but rather within family-led organizations such as SPAN, who has worked with the Department for years around enhancing family engagement for parents of students with disabilities and parents of young children at risk of academic failure. The plan should be revised to reflect contracting with an agency such as SPAN to coordinate the family engagement training and TA associated with the ESSER plan.

Specific Comments

Page 4 in PDF

Connectivity: Schools and districts should now be referring families to the FCC benefit.

Compensatory education: The document needs to mention the “additional year” legislation and its implications.

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Mental Health grants: While SPAN supports having additional funds for districts with larger and needier populations, the minimum \$45,000 grant to districts is very small and guidance on how to address mental health issues with these funds will be important.

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Equity/Disparities: While the document recognizes that there are disparities and indicates that the Department is using these funds to address disparities and enhance equity, there needs to be a more explicit equity focus throughout the plan.

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Mental Health: The plan does not focus on how schools will address the reality of the increased need for mental health services for students as a result of the pandemic, such as the increase in pediatric ER visits for mental health issues.

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Mode of instruction: While we are aware that all schools are supposed to be in-person starting in September, this won't fit all students' needs (for example, students with acute and/or chronic health conditions, or who live with others with such health conditions). Further, the plan neglects to mention what happens if COVID numbers rise.

Page 20 and 22; Appendix (pg. 49)

Safe reopening: This section discusses the commitment to having in person services to the greatest extent possible, but doesn't make explicit the reality that vaccination and health status must be taken into account. Districts cannot mandate in person instruction for every student, they must take into account the individualized needs of their students in making those decisions.

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IDEA: Students with disabilities suffered disproportionately during this pandemic. Specific effective strategies and resources, such as those of the US Department of Education's Technical Assistance and Dissemination Network, must be shared with schools and districts to address this major problem.

Conclusion

In conclusion, the four major areas that we would recommend strengthening include family engagement; addressing the needs of the most poorly-served students such as students with disabilities, English learners, students of color, etc. (including addressing compensatory education); the regional Training and TA teams; and how to recruit, strengthen and sustain partnerships with CBOs.

Please feel free to contact me with any questions or to discuss our thoughts in greater detail.

Very truly yours,



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