



June 3, 2021

The Honorable Dr. Angelica Allen-McMillan
Acting Commissioner
New Jersey Department of Education
100 River View Plaza
Trenton, N.J. 08625

Dear Acting Commissioner Allen-McMillan:

Thank you for the opportunity to provide feedback on New Jersey's proposed ARP ESSER State Plan. JerseyCAN is a nonprofit organization launched in March of 2013, and we advocate for a high-quality education for all New Jersey kids, regardless of their address. Since the start of the pandemic, JerseyCAN has contributed to national and state conversations around accelerating student learning, producing [NJ's first-ever statewide report on student learning loss](#) and [a framework of research-based best practices](#) to accelerate student learning. It is with these perspectives, as well as our extensive research and conversations with districts across the state, that we offer the herein comments.

I. Comment Regarding Robust Data Analysis -- Student Outcome and Subgroup Reporting (pages 11-15 of the State Plan)

First, we commend the NJDOE's commitment to utilizing various data points, including those around the Digital Divide, Learning Environment, Interim Assessments, and Start Strong Assessments to form a more robust understanding of student needs.

Recommendations:

A. A more accurate state-level snapshot to identify performance trends, gaps, and opportunities.

The spring 2021 statewide snapshot of student performance includes varying types of assessments used to determine grade-level performance, differing points in time at which those assessments were administered, and other important factors that varied across LEAs. Thus, a more accurate state-level snapshot is warranted to identify performance trends, gaps, and opportunities across our schools. We are requesting that a more comprehensive and consistent analysis of student outcomes and subgroup performance be conducted based on the statewide administration of the Start Strong in Fall 2021 and the Spring 2022 NJSLA summative assessment.

B. More frequent statewide data reporting for transparency

In addition to a more accurate state-level snapshot, frequent data reporting is essential to understanding and responding to the state's needs. As LEAs continue to use and refine

data to reprioritize and strategize ways to accelerate student learning, there will be a continued need for the State to release statewide reports indicating overall snapshots and trends; this will provide necessary transparency to guide intensive efforts to support students with the greatest needs. In addition, if possible, it would be helpful to use the Start Strong results to project anticipated performance on the Spring 2022 NJSLA summative assessments to be able to have a more common measure against which to measure progress.

II. Comments on NJDOE’s plans for the 5% Set-Aside to to Address the Academic Impact of Lost Instructional Time (pages 29-31 of the State Plan)

As a part of the 5% set-aside to address the impact of lost instructional time, we are recommending more specific efforts (1) to support high dosage tutoring, (2) use incentive or matching grants for districts, and (3) to create an innovation fund to support pilot programs for districts who seek to try new approaches to scheduling, staffing and other areas.

Recommendations:

A. Allocate funding specifically as a part of this set-aside for additional support for high-dosage tutoring.

A state grant could be made to the **tutoring partnership created by the NJ Pandemic Relief Fund and The College of New Jersey**. Our understanding is that this program will support approximately 2,000 students entering kindergarten through fifth grade. Using ARPA ESSER funds, the State could award a grant to serve more students and/or grant funding for awareness campaigns, tutor training, transportation, manipulatives, or social emotional learning supports that can be added for a more comprehensive, whole-child approach.

B. Support innovative evidenced-based best practices through the creation of incentive/matching grants for districts.

- **State-funded grant program to incentivize the adoption of high-quality curriculum.** The State could create a grant program that provides incentive funding for districts, charters, and renaissance schools that are using or adopting high quality curriculum, such as those that are highly rated by Ed Reports or those deemed high quality by the State.
- **State-funded grant program to incentivize the creation of regional master classes, particularly in subjects that are difficult to staff.** Regional master classes allow students who do not have access to hard-to-staff courses, such as AP Math and Science, to participate virtually in classrooms that offer these classes. Grant monies could be allocated to participating districts and cover the costs of technical infrastructure, staff stipends and collaboration costs.
- **State-funded grant program for innovations in school staffing.** LEAs could receive grant funding to rethink staffing structures in ways that result in accelerated student learning. [FutureEd](#) describes new and expanded roles for excellent educators, including master and mentor teachers (as seen in [Cadence Learning](#)) as well as multi-classroom leaders (part of Public Impact’s [Opportunity Culture](#)) in addition to flexible staffing models.

- **Expand what works by funding LEAs to expand schools that have a proven record of getting the best results for low-income students.** In order to improve outcomes for the neediest students in the State, one of the most impactful things that can be done is to get the schools that already serve these students well to expand their enrollment, or open new schools in neighborhoods where students are currently being underserved.
 - We recommend that the NJDOE create a grant application program that sets aside \$27.5 Million to support startup and expansion costs of the most proven schools and programs in the State’s DFG A Districts.
 1. District leaders who serve these student populations would be eligible for this program.
 2. Schools with a strong track record of student learning and life outcomes, in non-selective admissions environments would be prioritized for the grants
 3. They would be asked to outline initial plans to expand or replicate their program, and how they would ensure that once start-up costs they apply for are spent, the program would be financially sustainable out of the LEA’s normal budget.

C. Create an innovation fund that could be used to support grants or pilot programs in several areas such as extended school year pilot programs, standards-based grading, and the creation of individualized learning plans for every student.

- **More detail on individualized student learning plans:** Through the creation of an innovation fund or incentive grants, the state should incentivize LEAs to create individualized learning plans for every student. The state of Colorado requires such a [plan](#) (the Individual Career and Academic Plan) for each student beginning in grade nine and including individual/self-discovery, career exploration, academic planning and personal financial literacy. In addition, the [San Antonio Independent School District](#) is creating support plans for each student.

For additional information about our recommendations above regarding the state set-asides, please see our letter from May 21 available [here](#).

III. Comments on Effective Allocation of Resource and Monitoring of Funds
(pages 36-37 of State Plan)

Strong monitoring and accountability mechanisms are important for ensuring transparency and efficient use of funds. The NJDOE’s plan provides a foundation for monitoring, with its plans to revise the Risk Assessment Tool and update monitoring protocols. However, additional measures should be taken to create transparency in the use of funding considering the unprecedented level of funding provided to districts.

Recommendations:

- A. Create a stakeholder task force to guide effective use of funds:** This task force should include representation from key stakeholders outside of government, similar to the one recently initiated in the state of Connecticut. Stakeholders should advise on existing and emerging research to inform best practices, as well as provide guidance on the effective use of public funds.

- B. Create a new interagency government commission that would report to the Governor** and focus on data collection efforts needed to track student outcomes (including outcomes for specific subgroups of students), the effectiveness of various interventions and programs supported at the state and local level, make recommendations to support the replication of successful programs, and monitor the overall effectiveness of ARP ESSER funds spent by the State and at the local level.
 - Such a commission should include representation from New Jersey Departments of Education, Children and Families, Human Services and Office of the Secretary of Higher Education.
 - The stakeholder task force described above should report to this interagency commission.

IV. Comments on the State Plan Section on Supporting the Educator Workforce (pages 38-41 of State Plan).

In addition to the plans and efforts the State plans to undertake to support the stability and diversity of the educator workforce, pending legislation (S2826) would create a five-year pilot program for issuance of a limited certificate of eligibility for advanced standing and limited certificate of eligibility for certain teacher candidates. This legislation should be supported and signed into law by the Administration, as it will improve the diversity and overall supply for the educator workforce. Furthermore, other pending legislation that would require professional development related to cultural competency should be supported as well. This will provide educators with professional development on cultural competency, which will be beneficial for our educators and students as we seek to accelerate student learning.

Thank you for this opportunity to provide comments on the draft State Plan. We deeply appreciate the ongoing effort and commitment that you and your staff have made to get students back into classrooms and address their needs.

Sincerely,

Patricia Morgan
Executive Director, JerseyCAN