

February 15, 2022

Dr. John Goldhardt
Superintendent
Manchester School District
20 Hecker Street
Manchester, NH 03102

Via U.S. and electronic mail
(superintendent@mansd.org)

RE: Recommendations for meaningful stakeholder consultation regarding ARP ESSER III funds

To the office of Superintendent Goldhardt:

My name is Aviana Coco; I am currently partnering with Disability Rights Center - NH (DRC-NH) on a project regarding New Hampshire school districts' use of the American Rescue Plan Elementary and Secondary School Emergency Relief III (ARP ESSER III) funds. The main goal of our project is to connect the families DRC-NH serves to up-to-date information about school's plans for the funds and share opportunities for families to consult with their districts regarding fund allocation, as this funding provides a substantial opportunity for districts to invest in a wide variety of potential resources to address students' needs.

During our investigation, we determined that few school districts are maintaining sufficient communication with stakeholders. Federal requirements outlined within the American Rescue Plan Act of 2021 mandate that Local Educational Agencies (LEA's) engage in meaningful consultation with a variety of stakeholders, including "Students; families; ... and (B) To the extent present in or served by the LEA: ...civil rights organizations (including disability rights organizations); and stakeholders representing the interest of children with disabilities, English learners, ... and other underserved students".¹ Consultation should continue throughout the duration of time ARP ESSER III funds are allocated in order to be meaningful.

Back in August of 2021, DRC-NH provided New Hampshire LEA's with recommendations for maintaining meaningful communication with the public, including:

¹: Interim Final Requirements for the American Rescue Plan Elementary and Secondary School Emergency Relief ("ARP ESSER FUND"), promulgated by the U.S. Department of Education pursuant to Section 2001 of the American Rescue Plan Act of 2021. Federal Register, Volume 86, No. 76, p. 21201 (April 22, 2021)

²: DRC-NH Letter to Superintendents and School Board Members: Input on American Rescue Plan Emergency Relief Funds. DRCNH.org (August 6, 2021).

³: MANCHESTER SCHOOL DISTRICT ESSER II and III funds Recommended Allocations (August 9, 2021). Accessed on February 14, 2021 via Mansd.org/ESSER.

- Reach out to parent and community organizations to inform them of ARP ESSER funding plan requirements and seek their input.
- Post information re: plan development and how to provide input on the LEA's website, social media accounts, and other relevant platforms.
- Publicize and hold public meetings.²

In the original use of funds plan posted to the district website, Manchester School District (MSD) reports that the district “incorporated input from a variety of stakeholders”³ during plan development. Upon searching the district website, we were unable to find more detailed information about how stakeholder input was initially sought; we were also unable to find information about any recent or upcoming opportunities for stakeholders to continue to provide input. We have reached out to MSD via email and phone calls to inquire about such opportunities, but we were unable to connect with any representative who could provide this information.

In the interest of ensuring that the families served by DRC-NH, along with all other relevant stakeholders, have access to opportunities to provide input on how they feel ARP ESSER III funds should be allocated in MSD, we extend the following recommendations:

- Update the ‘ESSER’ page on the district website (mansd.org/ESSER), which currently contains only a link to the use of funds plan, to also include a current list of ways for stakeholders to provide input.
- Hold dedicated public meetings for discussing ARP ESSER III fund allocation, at least every six months and upon any major changes or additions to the use of funds plan.
- Provide alternative and accessible ways for the public to provide their input during the COVID-19 pandemic, such as an online survey, dedicated email address, etc. Make this information available and easy to find on the district website, school websites, and other easily accessible locations.
- Publicize opportunities for consultation and ways for families to find up-to-date information via social media, school email, and other relevant platforms.
- Designate an individual or team within the district who stakeholders may contact with questions or comments regarding the district's use of ESSER III funds (e.g. school board members, district grants manager, etc.). List the contact information for this individual or team on the district website, including both a telephone number and email address.

Thank you for taking the time to review these recommendations. The COVID-19 pandemic has impacted our community so severely over the past two years, and we commend the MSD faculty for their ongoing efforts to support students and families during such unprecedented times. It is our aim to ensure that the families served by DRC-NH, along with other relevant stakeholders,

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are informed and empowered to partake in the discussion of how best to use this funding to build back education for New Hampshire's young learners.

Please respond to this letter sharing the concrete steps MSD intends to take to establish and maintain meaningful consultation with stakeholders by Tuesday, February 22nd.

Additionally, please reach out with any questions, comments, or requests for how our project might be able to assist the maintenance of meaningful stakeholder engagement.

Sincerely,



Aviana Coco, NH-ME LEND Trainee
aviana.coco@UNH.edu



Stephanie Patrick, Executive Director
stephaniep@drcnh.org