MEMORANDUM NO. 2021-137

TO: School District Superintendents
    District Business Managers
    District Grant Managers

FROM: Shelley Hamel, Chief Academic Officer

DATE: December 20, 2021

SUBJECT: Meaningful Engagement for the ARP Implementation Plan

MEANINGFUL ENGAGEMENT FOR THE ARP ESSER IMPLEMENTATION PLAN

Purpose
The LEA ARP implementation Plan includes a federally mandated provision for districts to engage in “meaningful consultation” with stakeholders. This requirement was not accompanied by specific federal guidance on how this engagement must be carried out. This document aims to support LEAs fulfilling this mandate. To support this outreach and engagement process, the Wyoming Department of Education (WDE) has developed an optional Stakeholder Engagement Sample Bulletin that may be used to facilitate communication with the public and stakeholders. Evidence of engagement and solicitation of public comment will be a required element of the ARP ESSER grant application in the Grants Management System (GMS), so it is important that LEAs document their efforts and how the input they has received has informed their plans for ARP ESSER funds.

Interim Final Requirements
The Interim Final Rule (IFR) defines a specific set of sections that must be present in the ARP ESSER Implementation Plan (these are all present in the recommended WDE Template document) and identifies the list of stakeholder groups that must be engaged, in addition to seeking public comment.
**Meaningful Engagement**

Because there has been relatively little federal guidance on how engagement for ARP ESSER should be carried out, the Council of Chief State School Officers’ handbook on meaningful engagement provides a good resource as districts take up this task.

The handbook defines “meaningful engagement” in the following ways:

- In the context of education policy and decision-making, stakeholders are community members who are involved and invested in districts, schools, programs, and outcomes for students. Stakeholders include students, families, educators, leaders, and the many partners who support them.

- Engagement is the process of communicating to, learning from, and partnering with stakeholders that acknowledges the unique needs and strengths of the stakeholders involved.

- We believe that stakeholder engagement should be meaningful: it should be inclusive, clear, effective and ongoing in order to best support educational equity and excellence.

At base, district leaders should ask themselves, what do stakeholders need to understand about our school or district finance system in order to meaningfully engage with the stakeholders.

**FAQs**

**We advertised a webinar and no one came to our meeting. What does this mean for our stakeholder engagement?**

Recommendation: The US Department of Education has indicated that if an LEA can document this outreach as part of its “due diligence,” then it will count as part of their engagement efforts. The WDE encourages LEAs to seek multiple avenues for outreach and bear in mind that webinars might not reach families without access to the internet. To encourage maximum engagement, LEAs should offer multiple options for input such as scheduling engagement meetings at different times of the day and different methods such as email, mailing address, web comments, etc. to allow for maximum input.

**How can an LEA be sure it has reached out to the group of stakeholders?**

Recommendation: This issue can be difficult to resolve. LEAs can document reasonable outreach including placing information on its website, and sending direct communications to those that have requested information.

**How can an LEA resolve conflicts during the meaningful consultation process? For example, what if differing groups of stakeholders have different ideas for the funds?**

Recommendation: Engagement is the process of communicating to, learning from, and partnering with stakeholders and the LEA must consider all input from groups. Ultimately, the LEA, as the federal subrecipient of the funds and signatory to the required assurances, has the
final authority on how the funds are used. The WDE reminds LEAs of the importance of keeping documentation of all input and all decisions.

For more information, contact Danielle Netzer, Covid Emergency Funds GrantManager, at 307-369-6404 or danielle.netzer@wyo.gov.