

Community Advocacy Team  
Learn Safe Norman Initiative  
High-need & At-risk Students

**It goes without saying that everyone's goal is to return to a traditional school setting eventually, once it is safe enough for the city to return to some semblance of normalcy. Until then, we must recognize the gray area and learn how to work within it - not just on either side of it - if we are to create safe learning environments for *all* of our students and *all* of our educators.**

On behalf of our team of advocates and the families and teachers we support, we would like to acknowledge and thank the district for making the decision to delay the start date in order to allow teachers more time to plan and prepare, to begin school virtually in order to keep students and staff safe, and to allow our students to be taught virtually by NPS teachers.

It is our hope that the district will commit to implementing a well-researched hybrid A/B model that will best serve students, teachers, and families when it is safe to return to classrooms.\* It is also our hope that the district will commit to allowing all NPS teachers to continue to teach 100% virtually if they wish to do so.

## **Serving the Most Vulnerable Populations - High-need<sup>1</sup> / At-risk<sup>2</sup> Students**

### **Title I**

- Under the Elementary and Secondary Education Act (ESEA), Title I was conceived in order to compensate for the considerable educational deprivations associated with child poverty. Federal rules and regulations were created to guarantee that funds provided for through ESEA and Title I would be allocated solely to the benefit of students in need, based upon academic achievement and socioeconomic status.<sup>3</sup>
- Title I, Part D addresses Prevention and Intervention Programs for Children and Youth who are Neglected, Delinquent, or At-Risk. The goal is to improve educational services for these children and to prevent at-risk youth from dropping out of school.

### **CARES Act Funding<sup>4</sup>**

- Allocations of CARES Act funds to districts are tied to their proportion of Title I, Part A funds in fiscal year 2020. Title I, Part A funding is based on the percentage of a school's eligible student population categorized as low-income, ensuring that federal support reaches the greatest concentration of disadvantaged students.
- To access funds, districts may draw down from their allocation for 12 categories of COVID-19-related expenditures. The first category is activities authorized by the ESEA, including the IDEA (Individuals with

---

<sup>1</sup>

<https://www.ed.gov/race-top/district-competition/definitions#:~:text=High%2Dneeds%20students%3A%20Students%20at.left%20school%20before%20receiving%20a>

<sup>2</sup> <https://www.edglossary.org/at-risk/>

<sup>3</sup> <https://www.normanpublicschools.org/page/2480>

<sup>4</sup>

<https://sde.ok.gov/newsblog/2020-05-11/hofmeister-announces-145-million-coronavirus-relief-cares-act-funds-available>

Disabilities Education Act), the Adult Education and Family Literacy Act, the Perkins Act or subtitle B of Title VII of the McKinney-Vento Homeless Assistance Act

- Oklahoma public school districts are being given the opportunity to pursue incentive grants established by the OSDE and funded by a portion of Oklahoma's set-aside Elementary and Secondary School Emergency Relief (ESSER) funds. Districts that commit to spending in at least two of five areas - OSDE's "priority pursuits" - will be eligible to apply for additional funds.
  - NPS has announced that they will be expanding connectivity for students to enable distance learning by providing hot spots for families who do not have a reliable internet connection - one of the state's priority areas.<sup>5</sup>
  - Providing compensatory services to students identified to be at risk as a result of the closure of school buildings (i.e., English learners, students with disabilities, students needing credit recovery, etc.) is one of the remaining four priority areas.
- NPS's CARES Act allocation is \$2,093,212<sup>6</sup>

### **Need Assessment and Identification of Eligibility**

For students who are not being served under an IEP or 504 plan, an identification process will be necessary. This will also help to avoid the issue of families potentially taking advantage of the program.

In order to determine which students would qualify for placement in an on-site learning environment, each school site would create a team that includes counselors, student advocates, principals, school psychologists, and teachers to identify students who are served under certain programs - for example, Free and Reduced Lunch, Operation SchoolBell, and the Backpack Program - and those whom they feel would be at higher risk of abuse or neglect if they were to remain in their homes during the school day. (Anyone within the community -- other students, parents/guardians, friends, relatives, etc. -- who may be aware of a particular high-need/at-risk student's situation should bring it to the school counselor's attention. It is an unfortunate fact that many students fall through the cracks because no one spoke up for them.)

Additionally, an outreach program would need to be developed so that families who do not have access to internet service or transportation can be made aware of the RLC plan and how to receive services.

If the district chooses to follow the state recommended color-coded guidelines, eligibility may need to be prioritized by highest need in order to stay within the allowable percentage of enrolled students for each school site. Another option would be to open additional sites or spaces as needed. This should be possible due to the fact that there are several school sites that do not qualify for Title I and are therefore likely to have fewer qualifying students.

### **Possible Solutions**

Opening limited classroom space to students most in need of face-to-face services is one of the uses of CARES funding recommended by the Education Advisory Board (EAB).<sup>7</sup>

---

<sup>5</sup> <https://www.normanpublicschools.org/backtoschool>

<sup>6</sup> <https://docs.google.com/viewer?url=https%3A%2F%2Fsde.ok.gov%2Fsites%2Fdefault%2Ffiles%2FCares%2520Act%2520allocation.xlsx>

<sup>7</sup> <https://eab.com/insights/blogs/district-leadership/cares-act-funding-support-disabilities/>

The **OSDE School Safety Protocols** document indicates that students who are unable to receive instructional services through distance learning may receive certain services at a school site that is closed or at an alternate school site or other location. According to the ESEA, this exception should be extended to students who are served under the Title I program.

- *Students with disabilities who are unable to receive a Free Appropriate Public Education (FAPE) solely through a distance learning environment (as determined by the IEP team) and those students who are unable to receive instructional services through distance learning, not to exceed twenty-five percent (25%) of students enrolled at a site, may receive certain services at a school site that is closed or at an alternate school site or other location. Teachers and staff may be on campus as assigned.*<sup>8</sup>

While school sites absolutely should remain closed for traditional learning at this time, certain sites or sections of sites could be partially reopened in order to meet the needs of high-need students.\*\*

As was announced on August 2nd, some NPS school sites will be opened at a very limited capacity as Remote Learning Centers (RLCs) for the elementary school children of NPS teachers and staff.<sup>9</sup> This program could easily be expanded to serve high-need and SPED students in all grade levels.

- Remote Learning Centers (RLCs) (existing program)
  - Currently available to NPS employees for elementary children, ages 4-11
    - NPS teachers and/or school site employees with middle and high school children must secure approval from their site principal, and student must remain with parent/guardian in the classroom throughout the day.
    - NPS employees at district sites (*not* school sites) cannot bring their middle or high school children to work and must find supervision for their students outside of NPS.
  - Free care and remote learning assistance
    - Students will be assigned to the school they would normally attend
  - Staffed by district personnel
  - Students are separated into small groups and self-contained from others in the building
    - Consistent cohorts of no more than 8 students with the same two personnel each day
  - Breakfast and lunch provided
  - Outdoor time and other “brain breaks” in self contained or outdoor spaces

Prior to our knowledge of the NPS plan for RLCs, our research had led us to a similar concept:

- The SCOLss model
  - School sites are partially opened and converted into Safe Centers for Online Learning and Special Services (SCOLss, based on the SCOL model)<sup>10</sup> in order to address the needs of disadvantaged students, those whose families cannot afford to stay home and monitor their children and/or are unable to access reliable internet connection, and SPED students whose needs cannot be met through virtual learning.

---

<sup>8</sup> <https://sde.ok.gov/sites/default/files/documents/files/Oklahoma%20School%20Safety%20Protocols.pdf>

<sup>9</sup> <https://www.smcore.com/57tdj>

<sup>10</sup> <https://nyti.ms/3eTxwT1>

- Learning centers may be set up in large open spaces like gyms and auditoriums or spread throughout the school in a limited number of classrooms that allow for appropriate social distancing.
- School staff members and vetted volunteers<sup>11</sup> who feel comfortable with returning to an indoor school site may do so, provided appropriate social distancing can be maintained and other safety measures as per the AAP and CDC are put into place and strictly adhered to.
  - Staff members and volunteers help students connect to online courses during what would normally be regular school hours.
  - Free meal services continue for students who attend SCOLs.
  - District provides bus transportation for students who attend SCOLs.

**\* For any reopening plan development, we highly recommend researching the detailed models developed by the nonprofit Education Resource Strategies (ERS). [Their website](#) provides multiple examples of “comeback” plans that are tailored to each grade level.<sup>12</sup>**

\* Any concerns regarding potential FERPA violation can be addressed by the [FERPA and Virtual Learning Related Resources document](#) released by the Student Privacy Policy Office in March 2020.<sup>13</sup> This document provides links to resources and other FERPA documents with additional information, including details specific to distance learning during the COVID-19 crisis.

\*\* The RLC model could also be used to assist essential workers who can provide the school with a proof of employment and shift schedule.

***Complete details about all of the information provided in this document can be found in the footnotes.***

---

<sup>11</sup> <https://sde.ok.gov/background-checks-school-employment>

<sup>12</sup> [https://www.erstrategies.org/toolkits/covid\\_school\\_comeback\\_models](https://www.erstrategies.org/toolkits/covid_school_comeback_models)

<sup>13</sup>

[https://studentprivacy.ed.gov/sites/default/files/resource\\_document/file/FERPA%20%20Virtual%20Learning%202020\\_FINAL.pdf](https://studentprivacy.ed.gov/sites/default/files/resource_document/file/FERPA%20%20Virtual%20Learning%202020_FINAL.pdf)