



# NATIONAL ASSOCIATION OF ESEA

## STATE PROGRAM ADMINISTRATORS

Ensuring Student Equity & Access

September 20, 2018

Paul Kesner, Acting Director  
Office of Safe and Healthy Students  
U.S. Department of Education  
400 Maryland Avenue, SW, Room 3E-245  
Washington, DC 20202-6450

Dear Mr. Kesner:

The National Association of ESEA State Program Administrators (NAESPA) values our close relationship with the U.S. Department of Education (ED) and, in the spirit of that relationship, would like to offer this feedback regarding the rollout of the Temporary Emergency Impact Aid for Displaced Students (Emergency Impact Aid) program and the Assistance for Homeless Children and Youth program and point out several areas in which our member states saw opportunities for improvement.

First, NAESPA appreciates that ED set up dedicated email addresses where states could send questions regarding each program. NAESPA members sent questions to these email addresses, they did not receive timely responses. Some questions still have not received a response from ED. With such a short timeline at the local level for decision-making and program implementation, this lack of responsiveness led to confusion at both the state and local level, and hindered districts' ability to apply. Given the short timeframe to implement these programs, NAESPA would encourage ED to respond to all questions within 5 business days.

Second, multiple NAESPA members reported frustration with follow-up phone calls regarding both the Temporary Emergency Impact Aid for Displaced Students (Emergency Impact Aid) program and the Assistance for Homeless Children and Youth program. ED's stated reason for the calls was to "discuss any questions regarding your submission, and to provide information on next steps, including any necessary amendments, as appropriate." However, once the calls started, it was clear that ED had a set of prepared questions for states that went well beyond the scope of the application or guidance, which felt more like monitoring and failed to address the full scope of issues and questions from states. While NAESPA would certainly support the monitoring of these programs in concept, in these cases the reason for the calls and ED's expectations were not clearly communicated or understood, resulting in calls for which states did not have the appropriate information at-hand or the responsive staff in the room, limiting the efficacy of the calls and requiring additional follow-up by both parties.

Finally, NAESPA understands that these programs were situated in the Office of Safe and Healthy Students. There did not seem to be adequate coordination with the Office of State Support (OSS) on the implementation of these programs. OSS has spent considerable time developing relationships with specific state contacts and has consistently demonstrated professionalism and expertise in program management and state engagement. In addition, turnover within the disaster response team at ED contributed to the lack of communication and trust between states and the office. Utilizing the existing relationships between OSS and states could have been valuable, especially given the complexities of this program.

Again, NAESPA understands there were many challenges with this program, not the least of which was the abbreviated timeline for implementation. That said, it is clear there is room for improvement in this and future iterations of these grants. NAESPA has established a continuing and positive working relationship with ED and we would be very open to a conversation to discuss these specific concerns.

Should you have any questions, please contact Bob Harmon, NAESPA CEO at 800-256-6452 or [bob.harmon@eseanetwork.org](mailto:bob.harmon@eseanetwork.org).

Thank you,

A handwritten signature in black ink that reads "Sonya M. Morris". The signature is written in a cursive, flowing style.

Sonya Morris, President  
National Association of ESEA State Program Administrators