

Creating Opportunities for Learners: How CTE Leaders Can Leverage the American Rescue Plan for Lasting Success

The COVID-19 (coronavirus) pandemic has disrupted and impacted nearly every facet of daily life for more than a year. This is especially true for the nation's education and workforce development systems which have had to significantly adapt to the changes brought about by the coronavirus, many of which are likely to linger for the foreseeable future. In response to the enormity of this crisis, Congress has enacted several large-scale relief packages that have provided increasingly greater amounts of emergency aid to the nation's education systems and institutions to help cope with these challenges. As the coronavirus persisted through 2020 and into 2021, Congressional responses to the pandemic's impact grew in both size and scope. The most recent of these—the American Rescue Plan (ARP)—provided nearly \$1.9 trillion in economic aid, with nearly \$170 billion of funding dedicated specifically for the nation's K-12 and postsecondary education systems.

This policy brief seeks to examine the unprecedented investment made by the ARP and provide recommendations and considerations for the Career Technical Education (CTE) community to ensure these funds are spent wisely with maximal impact. CTE leaders sit at critical nexus points within education and career preparation systems. As reflected in Advance CTE's shared vision, Without Limits: A Shared Vision for the Future of Career Technical Education, CTE leaders must commit to working collaboratively to push beyond the current status quo of education and training systems, and create a more equitable and inclusive CTE system. The ARP represents a significant opportunity to begin to enact the core tenets of this vision for the future of CTE and leaders must be strategic, as well as bold, to ensure its success. In addition, CTE leaders' unique perspectives will be critically important to help state policymakers learn from prior experiences when the federal government made similarly large-scale investments in education and workforce preparation in response to a crisis.

In order to avoid the missteps of the past and ensure this investment has the impact Congress intended, CTE leaders must ensure that these funds are used thoughtfully to address the near- and longer-term needs of each learner. Congress intentionally structured the ARP to provide significant flexibility for states and local communities to meet their needs in the face of the coronavirus. These needs are multiple, overlapping, and while some may have predated the pandemic, the longevity of



the coronavirus has either accelerated or further exacerbated them. CTE leaders must therefore take a broad view of these associated impacts as they consider how best to deploy the resources from the ARP. With the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) implementation in full swing – and with that work new state visions for CTE – these efforts and related visions should serve as a guide future ARP investments and ensure that more learners throughout the nation have access to high-quality CTE opportunities.

Funding Streams in Focus: Education Stabilization Fund

As with previous pandemic aid packages passed by Congress, the ARP puts nearly all of the \$170 billion intended for education within an "Education Stabilization Fund" (ESF) account and uses this as the primary mechanism to distribute funding. Under the umbrella of the ESF are three interrelated funding streams providing funding for K-12 (the Elementary and Secondary Emergency Relief or "ESSER III"), postsecondary (the Higher Education Emergency Relief fund or "HEER III") and private K-12 schools (Emergency Assistance for Non-Public Schools or "EANS II"). Each of these funding streams distribute ESF funding, via prescribed formulae, to states, school districts, and postsecondary institutions.

Unlike past relief packages to date, however, the ARP contains new provisions requiring states and eligible recipients to direct certain portions of their funding allocations to address lost instructional time for learners. For the ESSER III funding stream in particular, the ARP requires that certain percentages of recipients' funding allocation be dedicated to providing summer and afterschool learning opportunities. On the other hand, the HEER III funding stream remains broadly flexible although the law does include new provisions that require postsecondary institutions to use a portion of their allocation to implement public health guidelines and to proactively reach out to learners regarding financial aid options that may be available to them. All ARP funds examined in this brief have a "spend by" date of September 30, 2023."

In addition, the ARP provides roughly \$3 billion for the Individuals with Disabilities Act (IDEA), over \$7 billion in supplemental funding for the federal E-Rate program to promote learner connectivity and digital access, and more than \$360 billion in direct aid for state and local governments. This policy brief primarily examines the possible uses of funds falling under the ESF. However, given the magnitude of these other investments, especially their potential to offset needs that could otherwise



be met by the ESF, it is important for CTE leaders to be aware of these available funding streams as wider state and local discussions continue regarding how best to leverage the ARP to meet the needs of all learners.ⁱⁱⁱ

Initial Action Steps

With the availability of ARP funding and related deadlines for spending these dollars, a range of possibilities will be newly available for consideration. Rather than focusing on one-time expenditures that add temporary value, wherever possible CTE leaders should prioritize investments that can positively impact education and career preparation *systems*. These investments can and should disrupt historical patterns of inequity, focusing on transformative rather than mitigative change. Systemic investments can be sustained over longer periods of time and have the potential to reach far more learners than more narrowly focused efforts. Before setting about to make use of the funding available in the ARP it is critically important that this work be approached thoughtfully and with intentionality. Towards these ends, CTE leaders and other stakeholders should consider the following initial action steps:

- 1. **Anchor Investments Within State CTE Visions:** With the implementation of Perkins V fully underway, all states now have new visions for CTE. Leaders should revisit these plans, evaluate how these have fared during the pandemic, and consider potential refinements to the strategies that undergird them. Plans for ARP funding should be aligned with and justified by components of these visions to ensure these funds are helping advance their realization. CTE leaders should prioritize the development of new guidance, technical assistance and related resources to support local implementation of key components within a state's CTE vision to the extent practical.
- 2. Map Assets and Assess Needs: Before endeavoring to make use of ARP funding, CTE leaders should reassess the needs of their state's CTE system, collect and analyze available data, map out existing assets to address duplication of efforts and determine whether any gaps exist in service delivery or availability. This work must be approached through an equity lens, to ensure resources and efforts are directed to the activities, communities and learners who need it most. One source to help identify priorities might be a statewide analysis of the comprehensive local needs assessments results.



- 3. **Cultivate Strategic Partners:** The ability to sustain the investments of the ARP over longer periods of time will depend, in no small part, on the extent to which these efforts and related workplans are shared with other strategic partners both inside and outside of CTE systems. These partnerships must be fostered early on, both to gain additional insights into states' needs as well to help carry these efforts forward well after the pandemic and the ARP. Consider the full spectrum of stakeholders engaged during the writing of the Perkins V plans.
- 4. **Focus on Cures, Not Band-aids:** As noted elsewhere, the ARP represents a significant opportunity to invest in activities that can address persistent challenges or longer-term needs. By taking this time to identify root causes of specific problems, CTE leaders can more effectively target ARP resources to address these underlying issues.

Approaching the ARP with these action steps in mind can help to ensure these funds are spent in more meaningful ways for learners and the systems serving them. In addition, CTE leaders should also consider changes to broader administrative approaches that may help with the effective expenditure of ARP funds. To the extent possible, CTE leaders should seek to streamline internal or state agency procurement processes and create financial intermediaries to support the encumbrance and administration of ARP funds.

Such an approach could include changes to administrative approaches or new procurement tools to expedite the use of these funds. For instance, state CTE leaders could consider the development of a single Request for Proposal (RFP) that establishes a pool of potential vendors to engage in a variety of education and workforce related services based on future statements of work. Alternatively, state agencies could consider creating financial intermediaries to address the administrative burden of resource management. Financial intermediaries like this can also help to expedite procurement and service delivery. Both of these strategies have been quite successful in **Delaware** as the state has navigated the pandemic.

Making the Most of the Investment: Key Areas for Consideration for CTE Leaders

As with any major federal investment, CTE leaders and stakeholders must navigate their own particular set of circumstances in their states and local communities to fully unlock the potential of the ARP. To that end, this section outlines a set of high-level considerations and suggestions for state CTE



leaders to make use of ARP funding, organized around four interrelated focus areas. These recommendations are based on an analysis of the ARP as currently structured. Future guidance from the U.S. Department of Education may shift these recommendations over time. Additionally, states and local communities have the ability to set in place additional requirements that may inhibit the ability of CTE leaders to use the ARP funds in the ways outlined here. Leaders should therefore consult with professional colleagues before moving forward with the recommendations in this section to ensure they will be feasible in specific state or local contexts.

Prioritizing Longer-Term Investments in CTE Systems

Although the ARP is a one-time investment and is not likely to be extended, CTE leaders should consider focusing funding efforts on activities that can have longer-term benefits for learners and CTE systems as a whole. Special attention must be paid to activities that can be sustained over longer periods of time, such as through the sharing of costs among multiple state agencies and related systems or simply using ARP funding to develop financing models that exist outside of federal support. Crucially, CTE leaders and stakeholders should keep in mind the alternative components of ARP funding that can potentially be used to address other priorities, thereby freeing up a greater amount of ESF funding for other important purposes. Towards these ends, CTE leaders should consider the following uses of ARP funding intended to provide longer-term benefits for CTE systems and the learners they serve.

- CTE leaders should consider using ARP funding to expand, improve, or otherwise modernize CTE facilities as one school district in **North Dakota** is currently <u>doing</u>. The ARP encourages state and local investment in school facilities as a means to mitigate the spread of the coronavirus and these efforts naturally extend to CTE. In particular, CTE leaders should consider directing resources towards <u>Area Technical Centers</u> given many are shared time (serving both secondary and postsecondary learners), serve wide geographic areas and are largely dependent on local sources of funding.
- Quality data is essential to any effective state CTE system. Leaders should therefore consider
 making significant new investments in state longitudinal P-20W data systems to help align
 these systems and support local programs and institutions improve data collection efforts. A
 state policy benchmarking tool to assist with some aspects of these efforts can be found here.



- Partly out of necessity over the past year, many states and local communities have moved towards virtual program, school or institutional tours to generate interest in CTE programs among prospective learners. Some states have reported substantial increases in program applications of over 100 percent year-over-year. To ensure adequate CTE learner enrollment in the future and given the success of these efforts to date, leaders should consider making virtual program tours more permanent moving forward and use ARP funds to get these efforts started or brought further to scale.
- Work-based learning (WBL) is incredibly important to the CTE enterprise. At the same time, it is quite difficult to provide adequate WBL opportunities for learners at scale. Recent Advance CTE research has shown that increasing the number of work-based learning coordinators—dedicated staff positions that facilitate these opportunities and engage with the employer community—can significantly help with these efforts. Given that the work of WBL coordinators can often benefit multiple systems and programs, CTE leaders should explore the feasibility of sharing these costs across multiple state systems or initiatives to ensure sustainability. One way to do this is through the development of a statewide vision for WBL—an activity which can help develop buy-in for this type of shared approach.
- Quality CTE instructors are an essential element for high-quality CTE. At the same time, the
 world of work is constantly changing. CTE leaders should therefore seek to leverage ARP
 funding to develop new opportunities to upskill the incumbent CTE instructor workforce. This
 could include activities such as paid externships with business and industry during the
 summer months or through the development of new professional development content
 helping update instructors' pedagogical skills and technical content knowledge among other
 potential approaches.
- CTE instructor shortages are a persistent challenge facing nearly every state and local community. This coupled with the need to build a more racially diverse CTE education and leadership pipeline, strengthening the CTE educator pipeline is a national imperative that leaders should consider addressing with ARP funding. Consideration should be given to providing incentive grants for local Perkins grant recipients to collaborate and foster partnerships to provide new "Grow Your Own" programs or other new pathways into the



profession. In **Nebraska**, the state has <u>partnered</u> with Educators Rising, a Career Technical Student Organization (CTSO), to help achieve some of these important goals.

- In many ways, policymakers will look to CTE in the coming years as a recovery mechanism as the nation moves beyond the coronavirus pandemic. Consideration should therefore be given to the development of "Build Back" programs—CTE programs of study or career pathways that are intentionally structured to meet state or local area employment needs that have arisen due to the pandemic. **Florida**, for instance, has used earlier federal pandemic aid dollars for rapid <u>credentialing</u> efforts for these same purposes with great success to date.
- The pandemic has forced education and workforce development stakeholders to be more innovative and flexible than ever before. As part of these efforts, new partnerships must be forged to help systems further adapt and effectively serve the needs of learners. CTE leaders should consider using ARP funds to facilitate engagement with new partners to extend the scope and reach of their work. For instance, **Washington** is in the process of partnering with the state's Americorps chapter to explore potential ways that CTE programs and this longstanding initiative can connect on behalf of learners and communities. This blossoming partnership aims to create an "IT Service Corps" to equip learners with Information Technology (IT) skills and deploy them to underserved communities to increase access to vital technical support.

Equity-Centered Learner Supports

The pandemic has exacerbated longstanding inequities within the nation's education and workforce development systems. As leaders consider how to most effectively use ARP funds, the root causes of these inequities must be identified in order to address them. This federal investment can provide a platform to draw more attention to these issues and provide resources to disrupt longstanding systemic inequities and then begin to do the long-term work of solving the challenges. To more equitably support learners with ARP funding, CTE leaders should consider the following uses intended to create the right conditions and provide critical supports to ensure learners feel welcomed and are able to successfully complete their CTE journeys.



- The coronavirus has ushered in widespread changes to instruction and learning across the nation. Many of these changes, particularly digital modes of learning, are likely here to stay for the foreseeable future. This has created an inequitable and bifurcated system where some learners have access to quality internet connections while others lack such connectivity. Yet, overcoming this digital divide is not just about the availability of broadband connections—learners must also have quality, internet-enabled devices in order to access these new forms of instruction. Outside of the ESF funds examined here, CTE leaders seeking to make further investments in digital equity should look to the ARP's \$7.2 billion "Emergency Connectivity Fund" which is intended to allow eligible schools and libraries to directly assist in acquiring devices.
- School counselors and other professionals with the ability to provide career guidance and advisement have long been in short supply. Moreover, states have not been particularly confident in the effectiveness of their existing career advising and development systems. CTE leaders should therefore consider adding additional capacity to these efforts to better support learners navigating education and training systems. To the extent practical, leaders should explore blending or braiding dollars from other funding streams to help make these investments sustainable over longer periods of time. Much like investments in work-based learning, the services and benefits provided by robust career advising and development systems, including full-time staff, can be shared across many systems and programs. As a consequence, CTE leaders should similarly explore strategies to share the costs of these investments with other systems to promote further systems alignment and ensure sustainability.
- Many learners, especially adults, face unique challenges that may inhibit their educational and career ambitions. CTE leaders seeking to better serve these learners should consider prioritizing investments in work- and education-enabling support or wraparound services such as assistance with childcare, food, transportation and help with other basic needs to ensure access and encourage program completion. For states or communities that have already developed financial aid assistance programs for learners, CTE leaders should also consider broadening the allowable uses of these funds to cover expenses such as these.



- To date, 45 states have set statewide postsecondary attainment goals to increase the number and percentage of learners who have attained a postsecondary education. To meet these important objectives within the next decade, state leaders will need to consider how to provide more pathways that culminate in shorter-term credentials of value. CTE leaders should consider developing scholarship opportunities for learners to earn industry-recognized credentials identified through state quality assurance processes and valued by employers.
- The coronavirus has dramatically upended labor markets throughout the nation, displacing workers and interrupting learners' efforts to pursue further education or training. To help mitigate this disruption and get more learners back on track, CTE leaders should consider using ARP funding to encourage working learners and near completers to reengage with their education or workforce training. Utah, for instance, recently announced the creation of a "Returnship" program for similar purposes.
- Federal CTE legislation has historically maintained a focus on ensuring learners, who are underrepresented in a given field of study or industry, are able to participate and be successful in related CTE programs. Perkins V has not only carried on this legacy, but broadened it to include a focus on special populations of learners. At the same time, women and communities of color have been disproportionately impacted by the pandemic. CTE leaders should therefore seek to leverage ARP funding to help states more fully realize Perkins V's authorized activities to promote nontraditional learner participation and completion, support for identified special populations, and make these efforts a core strategy to help more learners find rewarding careers.
- As noted elsewhere, many learners have stopped out of their education and training journeys due to the pandemic or, relatedly, because of unexpected financial challenges. ARP funding can be used to help reengage these learners in a variety of ways. For instance, CTE leaders could consider using funds to create peer-to-peer "nudging" programs intended to encourage learners themselves to reach out to their peers to reenroll or reengage. Additionally, a number of states have established microgrant programs to help learners cope with unexpected financial challenges. North Carolina's "Finish Line" grant program is one example of such a program, which has helped over 1,700 learners in this way to date.



Addressing Unfinished Learning

States and policymakers are moving away from deficit minded approaches to lost instructional time, increasingly reframing this conversation around the idea that learning is not time-bound and has simply been left unfinished. **Oregon**, for instance, has created an entire <u>guidance</u> document outlining this shift in thinking. Instead, more attention is being paid to strategies that accelerate learning as opposed to remedial or developmental educational models. Given ARP's explicit focus on these types of efforts, along with extending instructional time via summer enrichment and afterschool opportunities, CTE leaders must give thought to how these experiences could be structured to meet CTE learners' needs and set them up for future success. With this in mind, CTE leaders should consider the following to address unfinished learning due to the pandemic.

- Rather than focusing on remediation, which can further discourage learners and waste valuable instructional time, CTE leaders should consider using ARP funding to develop accelerated learning models that meet students where they currently are and, with the right supports, help them expedite their time to completion. <u>Dual enrollment</u> programs are one way to achieve this. Careful consideration must be given to designing dual enrollment programs with scaffolded supports—a critical programmatic element that will be needed to ensure all learners are able to access these opportunities and be successful, no matter where they are starting out.
- The coronavirus has required immense amounts of adaptability within education and training systems. CTE leaders should consider using ARP funding to provide for additional planning time, as well as incentives, for CTE instructors to collaborate with peers in other academic subjects to develop courses or pathways that can meet both CTE and academic graduation requirements. This strategy is often employed by career academies or at other CTE-focused schools or institutions where leveraging CTE's contextualized approach to learning can expedite mastery not only of technical content, but core academics as well. Such an approach could prove useful as part of a wider learning acceleration strategy.
- New forms of accelerated learning and related instruction will, by necessity, require additional training and professional development for instructors to ensure these efforts are effective. CTE



leaders should give consideration to developing new professional learning opportunities to enhance the incumbent CTE instructor workforce's ability to deliver accelerated learning.

- The ARP includes specific funding set-asides for extended learning time, such as summer and afterschool programming, as a primary method for addressing unfinished learning. For CTE leaders, these sets of funds can be used for activities that provide learners the opportunity to engage in work-based learning or earn a credential of value. Given that many learners may have missed opportunities to do both, summer and extended school programming can be one additional way to provide these opportunities ahead of the next academic year.
- To the extent that full-scale summer or afterschool programming is not feasible, CTE leaders can also consider shorter-term bootcamps. Such an approach may be helpful in coping with instructor capacity issues during the summer months. In addition, CTE leaders should give thought to engaging with Career Technical Student Organizations (CTSOs) or the employer community to help deliver these types of opportunities to learners which may further alleviate the burden on the incumbent CTE instructor workforce.
- Structured thoughtfully, ARP funding could also be used to develop financial incentives for
 "near completers" in relation to credential or skills assessment completion. CTE leaders should
 consider developing grant programs for this specific purpose, especially in light of wider
 statewide postsecondary attainment goals. For example, Maryland maintains a "One Step
 Away" grant program for similar purposes and Pennsylvania has more recently developed a
 "Near Completer" program to meet similar objectives as well.
- According to recent <u>research</u>, at least half of all states allow community or technical colleges
 to grant bachelor's degrees, yet only ten percent of community colleges report actually
 offering such "applied BA's." CTE leaders can give consideration to using ARP funding to
 develop new applied Bachelor degree programs that are fully integrated with CTE programs of
 study or career pathways programs. In this way, learners currently enrolled or considering a
 pathway in CTE will have a wider array of options as they progress in their education and
 training journey, ensuring that these experiences and related credits can be used towards
 such degrees.



Promoting Innovation

Digital and hybrid forms of learning are likely here to stay. These and other fundamental changes to education and training will, by necessity, inform the direction of instruction and learning within CTE well after the immediate effects of the pandemic begin to subside. CTE leaders must seek to better understand these trends and proactively integrate CTE activities within these new contexts. At the same time, CTE practitioners and leaders must continue to experiment and innovate to determine best practice approaches for the future. To help usher in this vision for the future, CTE leaders should consider the following uses of ARP funding to promote innovation in CTE that can better serve the needs of learners and employers alike.

- Educational technology is increasingly becoming the gateway through which learners access instruction content. In recognition of this, the ARP explicitly allows for the acquisition of technology that enables education. CTE leaders should think creatively about how best to leverage new and emerging forms of educational technology. For instance, in New Hampshire, the state is experimenting with eyeglasses mounted with small cameras and microphones that can be put to use within the CTE classroom. Both students and instructors can be equipped with these devices, allowing for remote instruction and learning to occur without the need for in-person interactions. This also has the added benefit of expanding the potential reach of CTE instruction, especially in rural or frontier communities.
- Given the widespread transition to digital forms of learning, a wealth of instructional content
 has been developed to assist in these efforts. CTE leaders should consider using ARP funding
 to develop libraries of virtual assets that can be put to use both now and in the future.
 Consideration should be given to how these open educational resources (OER) are structured,
 especially the formats or platforms that learners are most likely to make use of. Nebraska, for
 instance, has curated a set of OER content aligned to several career pathways in the state.
- In some cases, virtual or remote instruction will not be enough to fully deliver CTE content needed to prepare learners for career and life success. Several innovative states have been exploring how to repurpose RVs or other large vehicles into mobile CTE labs that can bring the classroom directly to learners. CTE leaders should consider using ARP funding for this purpose, to extend the reach of their CTE programs. Where possible, leaders should explore the



feasibility of making these mobile labs "swappable" so that they can be quickly repurposed for different program areas and needs throughout the school or academic year. Because of their ability to serve multiple schools and communities throughout a state, consideration should also be given to the sharing of these costs broadly.

- New forms of virtual learning and instruction require new approaches to how CTE professionals engage with much of this work. Since the advent of the pandemic, learners have been asked to participate in virtual work simulations or receive didactic instruction via video. To aid in these efforts, CTE leaders should consider engaging additional staffing capacity to support these approaches such as hiring videographers or simulation coordinators that can assist in this longer-term transition to hybrid and digital learning. Given the widespread transition to virtual instruction, CTE leaders should also explore the feasibility of sharing the costs of these positions with other parts of the education system or within an institution.
- Throughout the pandemic it has become clear that some CTE program areas have fared better in a virtual environment than others. In acknowledgement of this, CTE leaders should consider developing completely virtual CTE programs of study or related pathways, particularly in fields that lend themselves well to this approach such as those found in the IT Career Cluster.
- The ARP presents a unique opportunity to fundamentally reimagine how CTE practitioners manage work-based learning. CTE leaders should consider leveraging ARP funding to develop digital work-based learning management systems that can service several programs across multiple systems of education, workforce development and health and human services. Such systems could help CTE practitioners and leaders alike develop new work-based learning opportunities for learners and monitor and track progress toward state goals over time.
- As noted, the pandemic has required immense amounts of adaptability from CTE systems and practitioners. New approaches that may have been taken on by necessity because of the pandemic may prove useful beyond the immediate end of the current crisis. For instance, CTE leaders could consider using ARP funding to hire existing CTE instructors to directly supervise cohorts of students on work sites. Such an approach could alleviate burdens on employers and help more learners catch up on these experiences during the summer months.



Looking Ahead

The ARP presents an enormous opportunity for CTE leaders and the wider CTE community. As this law and its related funding resources reach more states, local communities and institutions, the ability to demonstrate the impact and efficacy of this infusion of funding into the nation's education systems will be paramount. To that end, CTE leaders should approach this work thoughtfully to ensure the needs of all learners are being served and can continue to be in the future. As this work continues, Advance CTE welcomes the opportunity to further engage with CTE leaders to assist in making the most of this unprecedented federal investment in education. For more information and for other coronavirus-related resources from Advance CTE, please visit <a href="https://example.com/here-community-related-

¹ More information regarding these funding streams can be found here: https://oese.ed.gov/offices/education-stabilization-fund/. The previously passed CARES Act and the Coronavirus Response and Relief Supplemental Appropriations Act of 2021 (CRRSAA) both used ESF as the mechanism for distributing education funds. As a result, the Roman numerals at the end of each funding stream mean that they were authorized by the ARP and not these earlier pieces of legislation.

ii The Tydings Amendment (20 USC §1225(b)) allows for one additional year for expenditure of these funds. The U.S. Department of Education is continuously updating guidance and related information on the ARP and related expenditure timelines. The latest information on this issue can be accessed here: https://oese.ed.gov/offices/american-rescue-plan/american-rescue-plan-elementary-and-secondary-school-emergency-relief/ and https://www2.ed.gov/about/offices/list/ope/guidance.html.

ⁱⁱⁱ In particular, the over \$7 billion in additional funds for the federal E-Rate program, collectively known as the Emergency Connectivity Fund, is intended to allow for the direct purchasing of devices that enable learners to connect to digital learning environments. Given the widespread transition to virtual learning, CTE leaders should also remain aware of the new flexibilities tied to this funding which are intended to allow a portion of these funds to be spent directly on devices.

Transformative versus mitigative change is a concept explained by Paul Gorski. A summary of each can be found here: http://www.edchange.org/handouts/approaches-to-equity.pdf.