

WARREN COUNTY SCHOOL DISTRICT

CENTRAL ADMINISTRATIVE OFFICES 6820 MARKET STREET RUSSELL PA 16345-3406

> GARY L. WEBER SUPERINTENDENT

May 2, 2024

Carmen M. Medina, Chief Division of Student Services PA Department of Education 607 South Drive, 5th Floor Rotunda Harrisburg, PA 17120

Ms. Medina,

This communication serves as the formal appeal request by the Warren County School District (WCSD) regarding the funding decision for its application to the 12 Nita M. Lowey 21st Century Community Learning Centers (21CCLC), Cohort 12 grant competition. The WCSD has received information on the scoring rendered by the three reviewers assigned to its application. That request was dated April 3, 2024, and was sent via email to the email accounts for ED 21stCCLC and yourself.

The district's appeal is based, in part, on the following major points:

- Discrepancies observed among the ratings provided by reviewers R1, R2, and R3.
 - o Reviewing the point totals and reviewer comments for the WCSD Cohort 12 application raises concerns regarding fairness and consistency in the evaluation process. While the difference between the ratings of Rater 1 and Rater 2 is relatively small at 60 points, the gaps widen significantly when comparing Rater 1 to Rater 3 (158 points) and Rater 2 to Rater 3 (204 points).
 - O Analyzing the individual ratings reveals a notable pattern: while the variations between Reviewers 1 and 2 remain relatively modest, discrepancies increase significantly when comparing their ratings with those of Reviewer 3. This indicates a lack of alignment in the evaluation criteria or potential bias affecting certain reviewers.
 - The inconsistencies and issues listed above are problematic, particularly considering that all raters are expected to adhere to the same rubric and scoring guidelines. These disparities have likely impacted the Warren County School District's eligibility for the 21st Century Community Learning Center 2024-2029 Cohort 12 grant. Addressing these discrepancies is crucial to ensure fairness and equity in the grant evaluation process.

(continued on Page Two) (continued from Page One)

The Warren County School District does not discriminate on the basis of race, color, national origin, sex, disability or age in its programs, activities or employment practices and provides equal access to the Boy Scouts and other designated youth groups. Inquiries may be directed to Mr. Eric Mineweaser, Title IX/Section 504 Coordinator at 6820 Market Street, Russell, PA 16345 or (814) 723-6900.

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- The original deadline for submission of the Cohort 12 application was Thursday, November 9, 2023. On Wednesday, November 8, 2023, the WCSD received an email from the 21st Century Community Learning Centers email account at 21stCCLC@csc.csiu.org. The email notified us that the deadline for the grant was extended to November 30, 2023.
 - The WCSD delayed its Cohort 12 grant submission with the intent of taking advantage of the additional time to review and edit the grant. Unfortunately, the two district staff members responsible for the grant were unavailable for much of that additional time, having scheduled medical appointments, vacations, and other work deadlines around the original Cohort 12 deadline.
 - The district is concerned that other applicants were able to take advantage of that additional time, penalizing the WCSD for having scheduled and prioritized appropriately based on the original deadline. In a highly competitive grant competition, every additional hour can potentially yield points in the review process. Additionally, one day of lead time is inadequate to make alterations in plans that would have allowed district staff more time to work on the Cohort 12 application.
- Geographic and Rural vs Urban Equity of Award Distribution
 - On page 31 of the Cohort 12 Request for Proposal, under item "K. Peer Review and Selection Process", is the following statement:
 - "b. Selection: Subject to PDE's approval and based on the availability of federal funds, geographic equity, and the inclusion of priority programming, grant awards will be made to applicants based on highest to lowest applicant point totals. All available funds will be utilized. 1) To the extent practical, PDE will award grants equitably among geographic regions within the state to include rural and urban communities."
 - Based on the published list of awards, the 30 awards given in the three southwestern Pennsylvania counties of Lehigh, Philadelphia, and Delaware exceeds the number of awards made to all of western Pennsylvania.
 - Additionally, given the awards published for Cohort 12, almost 75% of the \$27,217,459 available for Cohort 12 was awarded to what could be classified as urban districts.
 - Given the distribution of awards and awardee locations, it appears that the commitment to equitable distribution of awards carried little weight in the award process.

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The WCSD has provided after-school programming for its students since 2011 using funds from the Nita M. Lowey 21st Century Community Learning Centers (21CCLC) Grant program. Providing afterschool enrichment activities to rural students in need is an important service that helps broaden the horizons of our students and expose them to new interests and skills. At the same time, after-school programming provides much-needed academic enrichment support to help student performance in core subjects.

The Warren County School District appeals the Pennsylvania Department of Education's decision to deny its Cohort 12 application, which impacts children residing in the 775 square miles of Warren County. I look forward to your response and am prepared to provide any additional information necessary to move the appeal process forward.

Thank you for your time and consideration.
Sincerely,
Mr. Gary Weber
Superintendent

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