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ESA Implementation Roadmap

Executive Summary

Thirteen states have enacted 15 Education Savings Account (ESA) programs, with most signed into law in just the last three years. This pace makes it evident that families desire alternative education options and the freedom to exercise those options, and demand is only growing. Many lawmakers have already responded by committing to champion ESA legislation in their states this coming year. As a result, we anticipate the need for resources because while the concept of educational freedom is straightforward, the implementation of the programs that make it a reality is quite complex.

This ESA Implementation Roadmap is a first-of-its-kind resource crafted to whittle away at the complexities and provide a clear and complete blueprint for the successful design, launch and management of an ESA program. The resource goes beyond general information and context on implementation to include curated checklists, illustrative diagrams, and practical examples that guide and inform administrators through the entire process.

This toolkit is primarily intended for program administrators and policymakers in the front lines of designing, building, and administering new and existing ESA programs. Whether a stakeholder wants to pass a new program or improve the efficiency, effectiveness and impact of an existing program, this roadmap breaks down key components of ESA programs into actionable steps.

We acknowledge and encourage the uniqueness of each ESA program. As such, we hope this roadmap not only equips stakeholders with the necessary tools, but also inspires innovation that holds true to our vision in ensuring that every program intended to give families freedom in education is easy to sign up for, easy to use, and meets the felt needs and desires of families.

About yes. every kid. foundation.

We are devoted to unlocking the extraordinary potential of every kid.
We promote education that empowers families, helps implement bottom-up solutions, and advances education freedoms.

Roadmap Legend

This ESA Implementation Roadmap provides a roadmap for the successful launch and management of an ESA program. As with any roadmap, a legend is a key feature. This legend denotes steps that further break down the content so the user may more easily navigate the implementation process.



Plan

← The plan icon indicates the first step, to understand the resources required to align the program's administration with the prescription and intent of the law.



Design

← The design icon indicates approaches to managing the corresponding component of the ESA program, whether that be the state doing it themselves, outsourcing it to a vendor, or a combination.



Build

← The build icon indicates step-by-step direction in building the corresponding component of the ESA program. This guidance is based on the principles that every program be easy to sign up for, easy to use, and meet the felt needs and desires of families.



Execute

← The execute icon indicates the live aspects of the corresponding component, meaning processes involving interacting with and responding to families and education providers. Execution will reveal shortcomings in the plan, design, and building of the program, so be ready to respond accordingly.



Support

← The support icon indicates suggestions to build in continuous improvement processes and engage stakeholders early and often in collecting feedback to address issues.



Practical Example

← The case study icon indicates highlights of best practices and examples. The intent is to not only provide greater context on a specific program or topic, but also to offer a repository of experts and tools that users can leverage for their own efforts.



Chapter:

Student Applications

Introduction

The chapter conveys general strategies and best practices to facilitate a smooth application experience for families. The chapter is written so a program administrator may follow it to the letter or to use it in setting forth guidelines for a third-party vendor to adhere to.



Plan

Application processes for families participating in an ESA program differ across states, shaped by the specific statute that governs each program. Prior to application development, conduct a review of the statutory language that governs the program from an implementation perspective with a goal to understand the following:

- Resources available for administration of the program either through direct appropriation or reallocation.
- Student eligibility criteria (See Section: Understanding Eligibility Criteria) and relevant prioritization.
- All requisites pertinent to the application process, like processing timeframes and appeals.
- The cost benefit analysis of in-house administration versus outsourcing.



Design

While some states directly manage the development and processing of applications, others may outsource the task to a vendor. Depending on statutory requirements, there may be various approaches to consider when implementing the student applications. For example:

- State can have a scholarship program that families can apply to through the administering state agency.
- State can have a scholarship program that families can apply to through one or more third-party vendor.
- State can have multiple scholarship programs that families can apply to through the administering agency or various vendors.

Creating the Application

Purpose

This section will help ensure the applications are both accessible to families and easy for them to use. The creation of the application is broken down into four separate checklists: accessing the application, pre-application, application, and post-application.



Build

Accessing the Application

It is important to first consider how and where families (“applicants” or “users”) will access the application. This roadmap is relevant to online applications, but paper application requests should be considered as needed. The application as well as its location, if through a website or online portal, should:

- Be tested for compatibility on a variety of devices, network environments, browser versions, and operating systems.
- Be designed to incorporate robust data security measures including encryption, access controls, backups, and adherence to data protection regulations.
- Be centralized to allow users to submit information, upload documentation, and provide electronic consent and signature all in one place.
- Allow users to create an account via login credentials with functionality to easily retrieve and/or reset a password.
- Include an authentication tool for secure sign in.
- Allow users to manage one or multiple applications within a single account.
- Appear in languages other than English.
- Be accessible (e.g., screen reader-friendly, alternative text for images).

Pre-Application

Information should be provided to users prior to starting an application. This will be helpful in paving a clear pathway to success by informing stakeholders of programmatic requirements, increasing inclusivity and reducing future customer support requests. As such, the pre-application should consist of:

- Quick eligibility pre-assessment to confirm qualification for the ESA program.
- Subscription email or text messaging service on application updates.
- Estimated or average time that it takes to complete the application.
- Documentation required to complete the application and desired format for upload.
- Timeframe for notification of approval or denial of an application.
- Link to helpful application resources, such as a tutorial video instructing families how to complete the application, FAQ page about the program and how to use the award, and customer service page routing families to further assistance.

Application

The process of families completing the actual application should be simple and quick. To accomplish this, the application should:

- Use simple language and avoid acronyms or terminology unknown to families.
- Group related fields together.
- Clearly indicate which fields are required.
- Set answer format to avoid grammatical, accidental typing errors (i.e., Require date format "MM/DD/YYYY" as opposed to user self-typing in the date "Jamuart 33, 2041").
- Use skip logic and autofill features, especially for renewal applications.
- Avoid reset and clear buttons.
- Make error messages prominent and visible.

Continued on next page

Application (cont.)

- Tag each field with an information icon, also known as a graphical user interface (GUI) element, that allows a user to hover over the icon for further instruction or example.
- Avoid requesting information that can be sourced from the SEA or school district through existing student information systems.
- Allow for attestation and request only the documentation required to determine eligibility and avoid requesting documentation that can be sourced from other state agencies through existing database systems (i.e., Proof of identity and residency verification from the state's Department of Revenue, Department of Transportation or another state agency).
- Allow users to view, delete and re-upload required documentation.
- Allow the user to pause and save the application and then resume where they left off.
- Signal the step in the application process the user is in and preview the remaining steps.
- Allow electronic signature.
- Present electronic informed consent forms and compliance statements clearly.
- Allow download/print of submission receipt and generate email to the applicant.
- On the submission page, inform users about application notification timeframe (i.e., "You will be notified about the status of your application within one hour.")

Post-Application

Once families complete the application, post-application should include the following features and information:

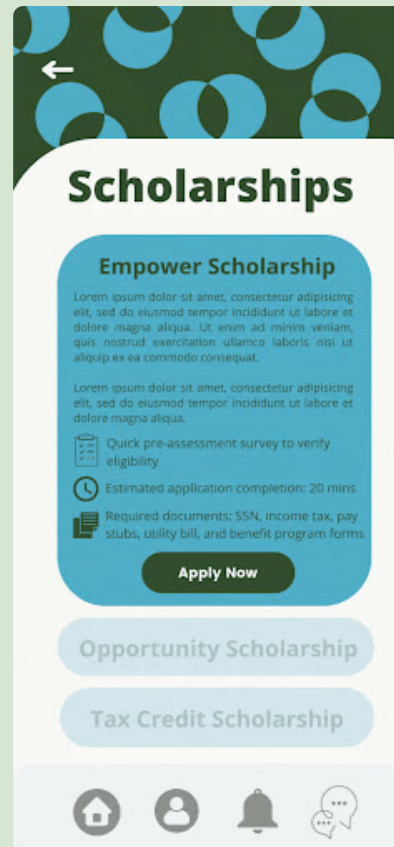
- Visually display the stage of application as a status (i.e., Under review, pending required action by applicant, approved, or denied).
- Provide application statistics (E.g., time it took to complete the application, application notification timeframe, customer service contact information).
- Auto-generate acceptance, update or denial notifications via portal, email, and SMS notifications.

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Post-Application (cont.)

- Enable secure messaging to communicate with users via the application portal. This will streamline communication and workflow when follow-up is needed. A secure messaging system can reduce the need for face-to-face visits, separate emails, and phone calls by giving families and staff a quick, convenient way to exchange information about the application, account and award.
- Upon sending application approval, provide information about accepting the scholarship and navigating the program (E.g., ESA handbook, contacts, tutorials, physical office address).
- Upon sending application rejection, provide detailed explanation about the reason and include information about appeal rights and procedures for resubmission. If statute does not outline appeal rights, administration should promulgate due process rights in rule for swift adoption.

Portal & Application Visual



Reviewing Applications

Purpose

This section provides a framework for reviewing applications. The below checklists map out a streamlined application review process and detail how to manage the review team.



Execute

Eligibility Verification

Some ESA programs are universal, while others have specific eligibility criteria. At a minimum, applicants are required to prove age and residency. As such, the verification of age and residency for eligibility will be the first step in reviewing applications. Prior to beginning the review process, conduct an initial review of the statutory language specifically from an eligibility criteria perspective with a goal to understand the following:

- If the program is universal, understand the documentation needed for proof of residency.
- If residency information will be validated automatically or manually (See Sections: Identity & Eligibility Verification Automation & Identity & Eligibility Verification Automation Case Study).
- The documentation needed for proof of each criterion and obtain training copies (e.g., IEP, means tested, foster care, birth certificate, active duty orders).

Streamlining the Review Process

To expedite the application review process and swiftly notify families, the process should integrate these key elements:

- Establish a team for application review, with team size commensurate with:
 - Automation integration;
 - Number of anticipated applications based on targeted or universal program type; and
 - Budget.
- Timeline for the application review process with specific target timeframes for closing issue resolutions and escalations (i.e., internal hierarchy of review process).
- Backend application processing software that facilitates manual and technological review (i.e., features to assign tasks to reviewers, manage deadlines, etc.).
- Communication templates on frequent issues that staff can utilize to communicate with families on issue resolution.
- Communication management tool to ensure issue resolution notes taken by phone, email, or secure messaging are captured in a central location and organized manner.
- Quality assurance measures that provide for accuracy and efficiency of the review process.

Team Management Practices

The team of staff dedicated to the application review process must be equipped with the necessary skills and knowledge. To accomplish this, integrate these team management practices:

- Execute training program to ensure staff understand the process and can collaborate, communicate, and work well together.
- Staff understand eligibility requirements, features and functionality of the application, customer service protocol, collaborating with necessary stakeholders, procedures for second-level review and denial appeal processes.
- Define roles and designate team leaders to coordinate efforts.
- Continuously identify potential risks and challenges associated with the application review process and consider how the team composition can mitigate them.
- Assess employee workload to ensure satisfactory customer service to all families.
- Empower staff to identify root causes and suggest solutions.
- Conduct, track and report performance audits regularly.



Support

Incorporate methods for continuous improvement of the application process to make the applications simpler and reduce completion, review, and approval times. Below are a few recommendations to achieve this:

- Use the checklists in this chapter to conduct a self-evaluation of the entire process. Determine whether items that went unchecked are necessary and prioritize how to address them.
- Allow and encourage families and team members to provide feedback regarding the application process. Capture the feedback in a central location and prioritize how to address them.
- Engage on-the-ground partners and advocates of the program since families may approach them first to seek guidance and assistance with the application process. Treat these stakeholders as an extension of your team. Solicit their feedback via planning and testing of beta versions of the application. Capture the feedback in a central location and prioritize how to address them.
- Collect and analyze the information below. Analyzing these metrics in the context of the application and review process can reveal bottlenecks and focus attention on critical pain points.
 - Data from eligibility pre-assessment survey
 - Number of applications received and processed each day
 - Average application completion time
 - Percent of applications abandoned, approved, closed or denied
 - Average length of time in notifying families of application status

Understanding Eligibility Criteria

Purpose

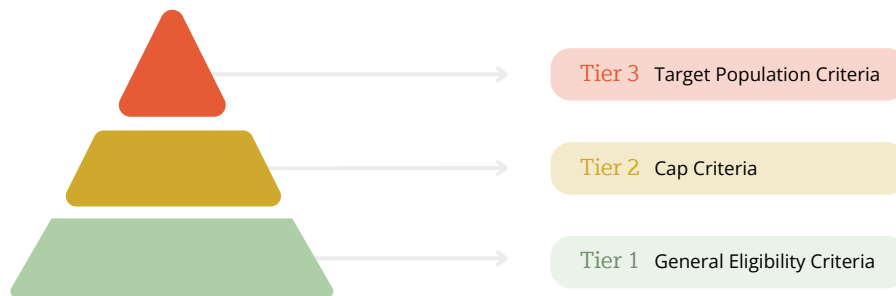
This section offers suggestions to streamline the application review process by providing insight on eligibility criteria and the best way to verify such criteria.

Importance of Eligibility Criteria

Eligibility criteria define the size and scope of an ESA program, acting as the primary gateway for participation. When initiating an ESA program, one of the initial steps in policy design is to establish these criteria. They outline the necessary characteristics all participants must have, offering a uniform standard to assess a diverse population for program entry. The legal definition of eligibility will determine the program's effectiveness and reach. **The more complex the eligibility criteria, the more challenging it will be for families to access the program.**

Types of Eligibility Criteria

To understand eligibility, envision it as a range from broad to specific levels. Policymakers and lawmakers have the flexibility to create numerous eligibility criteria for programs, each with significant effects. The more criteria added, the more it influences factors like the rate of participation, the efficiency of administration, and administrative cost.



Tier 1

General Eligibility is the most broad and inclusive, focusing on basic criteria like age, residency, and current school enrollment. The simplicity of these criteria, such as requiring a birth certificate or proof of residency, is geared towards creating open programs that are universally accessible or accessible to a wide range of students.

Tier 2

Cap Criteria introduces more nuanced requirements focuses on limiting the number of students to manage the allocation of resources. This tier includes priorities like application dates or specific enrollment conditions. Often, this is paired with a cap escalator, which allows for the gradual inclusion of more students towards universal access.

Tier 3

Target Population Criteria is the most specific and greatly compounds complexity. It focuses on groups with particular needs, such as low-income families, students with special needs, children of military personnel, and those with specific academic requirements. Due to the variability of the required documentation in this tier, ranging from means testing to medical records, it is likely a parent may have to submit upwards of half a dozen personal documents that are not captured by state systems (depending on the eligibility criteria). Furthermore, validating the documentation at the state level will slow and stall service to the families.

Examples of Common Eligibility Criteria

Tier 1

Student Age or Grade Level

Eligibility criteria based on students being school aged.

Residency or Geographic Area

Requirement that students live in the state or a more specific geographic location within that state.

Enrollment Status

Eligibility dependent on whether a student is currently enrolled in public or private schools (E.g., attended at least 100 days of public school the prior year).

Tier 2

First-In/Front of the Line

Criteria that may be used with Tier 1 or Tier 2 criteria that takes a Tier 3 target population and gives it priority when applying.

Fund Cap

Allows states to set the funding or appropriation level at a fixed amount serving a limited number of students.

First-Come-First-Serve

Cap allowing the state to set the program participation at a pre-determined student count.

Tier 3

Means Testing

Criteria that consider a family's financial situation, often prioritizing those with lower incomes.

Special Needs

Eligibility focused on students with disabilities, in foster care, from military families, or facing other unique challenges.

Academic Performance / Previous Environment

Criteria based on a student's previous academic environment or academic achievements, often targeting those who are not meeting minimum standards or attending schools labeled persistently failing.

Required Documentation & Automation Complexity

The more specific the eligibility criteria, the more complex the application and review process becomes. The table below provides examples of the documentation required during the application process by eligibility tier. Additional qualification requirements usually places a greater burden on families to access and upload documentation, lengthening the application completion process, and demands thousands of additional hours of labor during the application processing period. The table rates the level of administrative complexity and the possibility of automating the process to reduce workload. To learn more about automating the process of verifying identity and eligibility criteria, see section 1.5

Eligibility Tier	Sample Required Documentation	Administrative Complexity & Automation Possibility
Tier 1 General Eligibility	Proof of residency, birth certificate or proof of age/grade, current enrollment verification in public/private school.	Basic criteria make implementation easier. Administrative Complexity: Low Automation Possibility: Likely
Tier 2 Cap Criteria	Tier 1 required documentation, plus additional documentation to verify priority under cap criteria.	Additional criteria for cap management increases complexity. Administrative Complexity: Moderate Automation Possibility: Moderate
Tier 3 Target Population	Tier 1 required documentation, plus additional means testing documents (for low-income families), medical/educational records (for special needs), military ID/orders (for military families), foster care documents (for foster children), academic records (for academic-based eligibility), etc.	Highly specific and varied criteria make implementation challenging. Administrative Complexity: High Automation Possibility: Unlikely

Identity & Eligibility Verification Automation

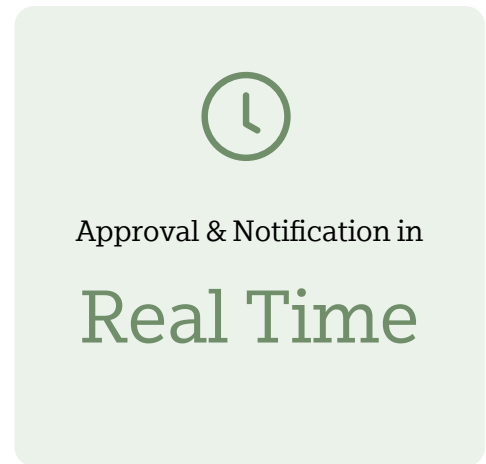
Purpose


The purpose of this section is to guide in transforming required eligibility verification processes from manual, error-prone methods to efficient, automated systems. It aims to demonstrate effective streamlining of verification procedures, ensuring accuracy and compliance with regulatory standards, to greatly enhance efficiency provide families with timely application status notifications.

Why Automation?

Automation aims to replace burdensome, manual application completion and reviewal methods with a more efficient system. It involves data integration between information systems to validate documentation, such as residency, across state agencies. By integrating state information systems and using technology to automatically verify eligibility, we can eliminate the need for parents to submit and program administrators to review documentation that is already accessible to the state.

The technology to allow for data integration and processing can be procured via a third-party solution to minimize human error, boost processing speed and customer satisfaction, and streamline application handling.




 Approval & Notification in
Real Time

Requirements

To allow automation in identity & eligibility verification for ESA program, program administrators must secure the following:



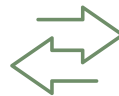
Authority/Funding

Legal authority and sufficient resources to administer or contract for the administration of the application process.



Partners

Solicitation of a third party solution that includes custom Application Programming Interface (API) to integrate disparate data sources.



State Agency Cooperation

Cooperation from data custodians must be in place for secure data transfer (e.g. enabling access to Department of Transportation address verification).



Safety & Security

Oversight from the relevant state information technology leaders is recommended to ensure security of personal data.

How It Works

Define Integration Objectives and Requirements

Identify the goals of data integration (e.g., automating residency verification) and the specific data needed from various state agencies.

Establish Data Sharing Agreements

Coordinate with legal teams to create agreements between the ESA program and relevant state agencies, addressing data privacy and security.

Develop Data Integration Architecture

Design the technical framework for data integration, selecting platforms or tools for secure connectivity between systems. Develop a guide for aligning data fields and establish rules for standardizing data from different sources.

Test Integration Solution

Build the integration solution based on the architecture and conduct thorough testing for data accuracy and system capacity.

Ensure Data Security and Privacy Compliance

Implement security measures and ensure compliance with data privacy laws like FERPA for educational data.

Deploy and Monitor Integration System

Roll out the integration system for use and continuously monitor its performance for efficiency and accuracy (see below).

Provide Training and Support

Train ESA program staff and stakeholders on system usage and provide ongoing technical support.

Evaluate and Update System Periodically

Regularly review and update the system based on performance feedback and user experience.

Identity and Eligibility Verification Automation Case Study



Practical Example

Signed into law on January 24, 2023, Iowa's Students First Act enacted one of the most expansive school choice programs in the country. The bill establishes an ESA program for eligible families to cover tuition, fees, and other qualified expenses at accredited nonpublic schools in Iowa. Universal eligibility is phased in over three years, with eligibility limited based on household income in years two and three.

There were several risks to launching the program on time including an expedited timeline for application process development, data fragmentation across disparate sources, lack of incentives for collaboration from key stakeholders, and the pressure of a brief application window. In navigating these complexities, a public-private partnership played a pivotal role in delivering innovative automation solutions that streamlined the application process, alleviated administrative burdens, and upheld the integrity of the program.

Approach

- Executive Leadership Motivated Urgency**

The Governor's office played a pivotal role in ensuring an expedited program launch. Marking program implementation as a top priority, the Governor's support facilitated collaboration between the Tax Commission and the Department of Education. This leadership contributed significantly to the program's success.
- The Request for Proposal (RFP) was used for Market Discovery**

Soon after the program was enacted, an RFP was released identifying the administrative areas where the state required support. One of the areas identified was a process for validating participant eligibility. Odyssey, a vendor committed to making ESA and microgrant programs more accessible to families and more transparent for state leaders, proposed a streamlined process and was ultimately selected.

The RFP supported the vendor's success by providing guiding information for the vendor upfront, such as the roles, responsibilities and expectations to be met. This proactive approach in developing a well-framed RFP was crucial in minimizing potential challenges during the implementation phase.
- The Vendor Leveraged Technology for a Better User Experience**

Odyssey, with its cutting-edge technology, was instrumental in providing a seamless and modern experience for families. The platform used an automated approval process for applicants, enabling the successful verification of applicants' residency, income, and identification within seconds rather than weeks.

Odyssey offered a holistic solution, eliminating the need for families to upload extensive paperwork during the application process. This not only relieved the administrative burden on families but also reduced the state's dependence on additional personnel for application management. The technological infrastructure acted as a catalyst, allowing the program to scale effectively.
- Contingency Planning as a Strategic Imperative**

Participating agencies included the Governor's office, the Tax Commission, and the Department of Education. If agency participation waned, the program had contingencies in place, such as using voter records to verify residency, to ensure a backup plan to verify eligibility.

Approach (cont.)

Data Utilization for Efficient Processing

With Odyssey's technology and collaboration from the state agencies, a task that usually takes weeks done manually elsewhere was reduced to milliseconds. In Iowa, the Tax Commission possesses all the records required for identity and eligibility verification, such as tax returns and residency requirements. Meanwhile, the application requires certain information, including full legal names, addresses (including previous year's tax return address, if applicable), and Social Security or ITIN information. To facilitate instantaneous data verification, Odyssey developed a customizable Application Programming Interface (API) to allow for seamless communication between systems, ensuring immediate backend verification when parents submitted their residency and income data.

Data Sharing and Consent

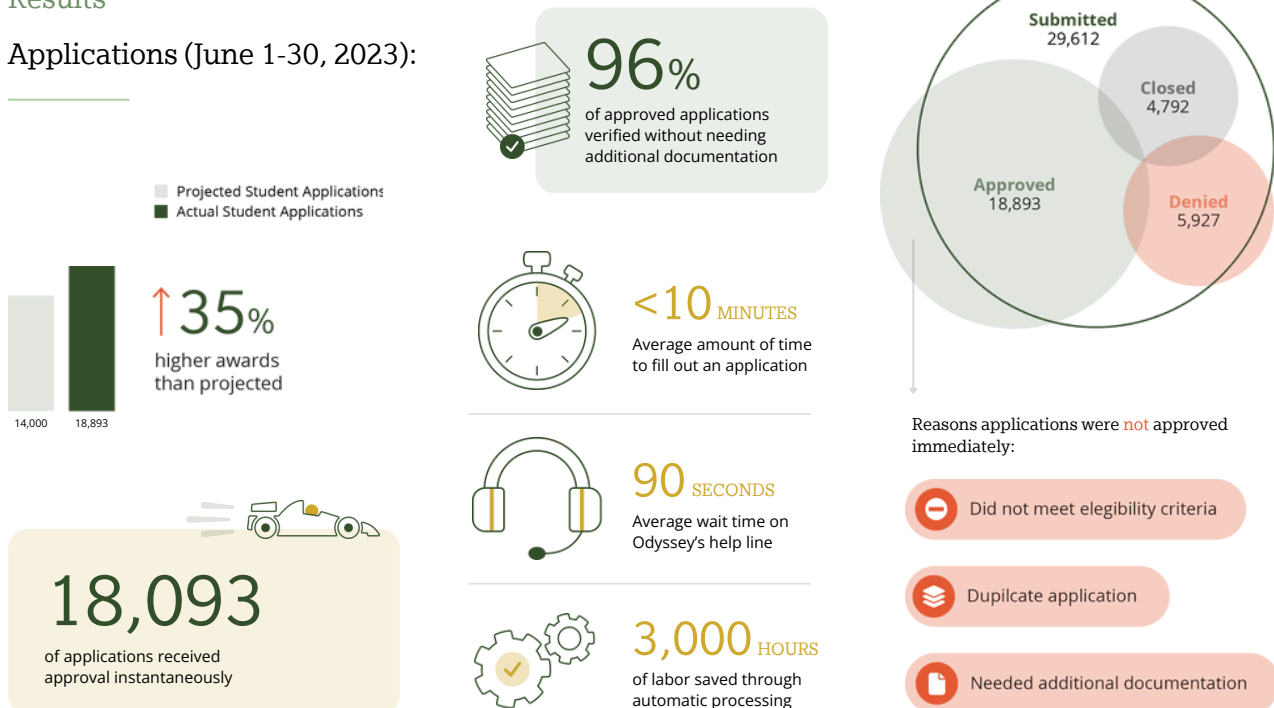
Communication between systems cannot happen without data sharing. Since data cannot be shared without the informed consent of the owner, Odyssey implemented a process where guardian acknowledgment and consent were obtained via electronic signatures. The Tax Commission also notified parents about the information-sharing process, ensuring transparency and compliance.

Efficiency and Resource Allocation

The program moved swiftly from implementation to launch in just 6-8 weeks, a testament to efficient project management. Both the state and Odyssey allocated necessary resources and stakeholders to support the program. On the governmental side, the vested stakeholders included the ESA program's director and the program's IT lead at the Department of Education, the IT team at the Tax Commission, and the state communications team. On the vendor side, Odyssey leveraged its U.S. based support team, project leads, implementation manager, account manager and technology team, as well as operations and marketing to create continual demand for the program.

Results

Applications (June 1-30, 2023):



Attestation Forms

Purpose

Incorporating parent attestation forms could significantly streamline the application process, particularly for groups with specific needs. This approach would rely on the parents' affirming statements regarding their child's eligibility, such as special needs status or family income level. This method balances the need for a swift application process with the necessity of maintaining program integrity and fairness. It acknowledges the challenges families might face in quickly gathering complex documentation, offering a more accessible and efficient pathway to apply for assistance while still ensuring due diligence through subsequent state verification.



Practical Example

Sample Attestation Form

Check and initial all that apply

Initial

Residency Verification

I hereby confirm that I am a legal resident of [State Name].

School Attendance

I confirm that my child is currently attending [School Name] in [School District] and has been an enrolled student since [Date].

Income Verification (if applicable)

I confirm that my household income falls within the eligible range for the ESA program pursuant to [Statute/Rule/Link].

Special Needs (if applicable)

I confirm that my child has been medically/educationally diagnosed with [Specify Condition] which requires special education services pursuant to the Individuals with Disabilities Education Act (IDEA) [20 U.S.C. § 1400 et seq.] or in accordance with Section 504 of the Rehabilitation Act of 1973 [29 U.S.C. § 794].

Attestation and Legal Acknowledgment

I, [Applicant's Full Name], in my capacity as [Relationship to Student, e.g., Parent/Guardian], hereby provide this attestation concerning my application to the program. I affirm that all information provided, including attached documents and supplementary evidence, is complete, true, and accurate to the best of my knowledge and belief. I understand that this Information is critical for determining eligibility for the ESA program.

Legal Consequences of False Information

I acknowledge that any willful provision of false, misleading, or incomplete information within this application may result in immediate disqualification from the ESA program pursuant to [Statute]. I understand that such actions may also carry legal consequences, including but not limited to civil or criminal penalties under applicable [Statute/Rule].

Understanding of Terms

I acknowledge that this attestation is a binding legal declaration subject to verification by the ESA program administrator.

Electronic Signature

About

Implementation of any innovative education program, such as an ESA, often comes with questions and challenges. This roadmap represents a small sampling of the technical assistance our yes. every kid. foundation. team can provide to ensure your ESA program is successful. Our expert consultants collaborate with governments and their partners to deliver programs that put families first and foster a thriving marketplace of learning opportunities for all kids.

To partner, email us at implementation@yeseverykid.com

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