



April 26, 2021

TO: Lucas Narducci
President, Arizona State Board of Education

FROM: Whitney Marsh
Deputy Chief of Staff, Arizona Department of Education

RE: Empowerment Scholarship Account Program Quarter 3 Report

Dear President Narducci,

The Department of Education (Department) is pleased to submit to the State Board of Education (Board) the Empowerment Scholarship Account (ESA) Program Fiscal Year 2021 Quarter 3 Report pursuant to Title 7, Chapter 2 Article 15 of the Arizona Administrative Code.

We look forward to our discussion at the next Board meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "Whitney Marsh".

Whitney Marsh
Deputy Chief of Staff
Arizona Department of Education



Empowerment Scholarship Account (ESA)

Quarterly Report to the Arizona State Board of Education

Fiscal Year 2021

Quarter 3

April 2021

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1 Introduction

In accordance with Article 15 Empowerment Scholarship Accounts Rule 7-2-1503 Department Responsibilities, the Arizona Department of Education and the Empowerment Scholarship Account Program present this quarterly report to the Arizona State Board of Education. This report reflects data and information from quarter 3 of fiscal year 2021 and covers the time from January 2021 to March 2021. As stipulated in Rule 7-2-1503 item 5, this report includes the following:

- a) The number of students in the program disaggregated by eligibility, grade level and the school district or charter school associated with each student;
- b) The annual award amount associated with each student;
- c) The number of ESA applications received, approved, and denied in the preceding quarter, including the justification for the denied applications;
- d) The number of applications processed within 45 days of receipt and the number of administratively incomplete applications;
- e) A summary of any parent input or feedback collected pursuant to R7-2-1503(6) and how the Department is responding to concerns submitted as part of the process;
- f) Information on the private financial management firm contracted to assist with financial management of the program, including:
 - i. The number and eligibility type of accounts utilizing the firm,
 - ii. The number of providers and vendors on the firm's platform,
 - iii. Communications and training provided to parents,
 - iv. Concerns from parents submitted to the Department, the Treasurer, and the private financial management firm and how the Department, Treasurer and private financial management firm are addressing the concerns, and
 - v. Any other information the Board requests

2 Students in the Program

This section includes the number of students in the program disaggregated by eligibility, grade level, and the school district or charter school associated with each student.

As of March 31, 2021, there are 9,831 active students and 166 exited students in the ESA program.¹ By comparison, there were 9,718 students in the program during quarter 2.

2.1 Students by Eligibility Category

Eligibility Category	Count of Students
Special Needs	5,854
Adoption / Foster Care –Planned Adoption	515
Attending D/F School	452
Sibling	1,476
Military	1,034
Previously in ESA Program	88
Legally Blind/Deaf/Hard of Hearing	42
Residing on a Native American reservation	370
Total Active ESA Students	9,831
Exited Student	166
Total	9,997

2.2 Students by Grade Level

Grade Level	Count of Students
Preschool	296
Kindergarten	754
1st	832
2nd	842
3rd	922
4th	917
5th	826
6th	851
7th	787
8th	722
9th	603
10th	539
11th	408
12th	532
Total	9,831

¹ Exited students do not receive any additional monies, these students have finished high school and have remaining funds to continue using.

2.3 Students by Associated School District or Charter School

When fewer than 10 students are reported for a school district or charter school, showing the count may risk an individual student's anonymity. In these cases, the Department does not report a count for that school district or charter school, and you will see the * symbol instead.

District/Charter	Count of Students
A Center for Creative Education	*
Academy Del Sol, Inc.	*
Academy of Mathematics and Science South, Inc.	*
Academy of Mathematics and Science, Inc.	*
Academy of Tucson, Inc.	*
Accelerated Elementary and Secondary Schools	*
Acorn Montessori Charter School	*
Agua Fria Union High School District	29
Ahwatukee Foothills Prep Early College High School, Inc.	*
Ajo Unified District	*
Alhambra Elementary District	24
Allen-Cochran Enterprises, Inc.	*
Altar Valley Elementary District	*
American Basic Schools LLC	*
American Charter Schools Foundation d.b.a. Estrella High School	*
American Charter Schools Foundation d.b.a. West Phoenix High School	*
American Heritage Academy	*
American Leadership Academy, Inc.	76
American Virtual Academy	28
Amphitheater Unified District	128
Anthem Preparatory Academy	*
Apache Junction Unified District	29
Archway Classical Academy Arete	12
Archway Classical Academy Chandler	*
Archway Classical Academy Cicero	*
Archway Classical Academy Glendale	*
Archway Classical Academy Lincoln	*
Archway Classical Academy North Phoenix	*
Archway Classical Academy Scottsdale	*
Archway Classical Academy Trivium East	*
Archway Classical Academy Trivium West	*
Archway Classical Academy Veritas	*
Arete Preparatory Academy	*
Arizona Agribusiness & Equine Center INC.	*
Arizona Autism Charter Schools, Inc.	38
Arizona Community Development Corporation	*
Arizona Connections Academy Charter School, Inc.	129
Arizona Montessori Charter School at Anthem	*
Arizona School For The Arts	*
Arlington Elementary District	*
ASU Preparatory Academy	*
ASU Preparatory Academy - Casa Grande	*
ASU Preparatory Academy Digital	*

District/Charter	Count of Students
Avondale Elementary District	66
AZ Compass Schools, Inc.	*
Baboquivari Unified School District #40	*
Ball Charter Schools (Dobson)	*
Ball Charter Schools (Hearn)	*
Ball Charter Schools (Val Vista)	*
Balsz Elementary District	16
BASIS Charter Schools, Inc	*
BASIS Charter Schools, Inc.	*
BASIS Schools, Inc.	59
Beaver Creek Elementary District	*
Benchmark School, Inc.	*
Benjamin Franklin Charter School	17
Benson Unified School District	*
Blue Ridge Unified School District No. 32	28
Blueprint Education	*
Boys & Girls Clubs of the East Valley dba Mesa Arts Academy	*
Bright Beginnings School, Inc.	*
Buckeye Elementary District	46
Buckeye Union High School District	17
Bullhead City School District	*
CAFA, Inc. dba Learning Foundation and Performing Arts Gilbert	*
Calibre Academy	*
Cambridge Academy East, Inc	*
Camelback Education, Inc	*
Camino Montessori	*
Camp Verde Unified District	15
Candeo Schools, Inc.	*
Carden of Tucson, Inc.	*
Carpe Diem Collegiate High School	*
Cartwright Elementary District	30
Casa Grande Elementary District	49
Casa Grande Union High School District	*
Catalina Foothills Unified District	61
Cave Creek Unified District	78
Center for Academic Success, Inc.	*
Challenge School, Inc.	*
Challenger Basic School, Inc.	*
Chandler Preparatory Academy	*
Chandler Unified District #80	380
Chinle Unified District	*
Chino Valley Unified District	13
Choice Academies, Inc.	*
Cicero Preparatory Academy	*
CITY Center for Collaborative Learning	*
Clarkdale-Jerome Elementary District	*
Cochise Community Development Corporation	12
Colorado City Unified District	*
Concho Elementary District	*

District/Charter	Count of Students
Congress Elementary District	*
Continental Elementary District	13
Coolidge Unified District	30
Cottonwood-Oak Creek Elementary District	14
Crane Elementary District	61
Creighton Elementary District	48
Crown Charter School, Inc	*
Daisy Education Corporation dba Paragon Science Academy	*
Daisy Education Corporation dba Sonoran Science Academy	*
Daisy Education Corporation dba. Sonoran Science Academy Davis Monthan	*
Daisy Education Corporation dba. Sonoran Science Academy Peoria	*
Deer Valley Unified District	350
Desert Heights Charter Schools	*
Desert Springs Academy	*
Desert Star Community School, Inc.	13
Destiny School, Inc.	*
Douglas Unified District	*
Dysart Unified District	254
EAGLE South Mountain Charter, Inc.	*
East Mesa Charter Elementary School, Inc.	*
Ed Ahead	*
Edge School, Inc., The	*
Edkey, Inc. - Arizona Conservatory for Arts and Academics	*
Edkey, Inc. - Pathfinder Academy	11
Edkey, Inc. - Redwood Academy	*
Edkey, Inc. - Sequoia Charter School	*
Edkey, Inc. - Sequoia Choice Schools	238
Edkey, Inc. - Sequoia Pathway Academy	*
Edkey, Inc. - Sequoia Ranch School	*
Edkey, Inc. - Sequoia School for the Deaf and Hard of Hearing	*
Edkey, Inc. - Sequoia Village School	*
EduPreneurship, Inc.	*
Eduprize Schools, LLC	91
E-Institute Charter Schools, Inc.	*
Elfrida Elementary District	*
Eloy Elementary District	12
Fit Kids, Inc. dba Champion Schools	10
Flagstaff Junior Academy	*
Flagstaff Unified District	25
Florence Unified School District	104
Flowing Wells Unified District	13
Foothills Academy	*
Fort Huachuca Accommodation District	48
Fort Thomas Unified District	39
Fountain Hills Unified District	20
Fowler Elementary District	*
Franklin Phonetic Primary School, Inc.	*
Freedom Academy, Inc.	*

District/Charter	Count of Students
Friendly House, Inc.	*
Gadsden Elementary District	*
Ganado Unified School District	*
GAR, LLC dba Student Choice High School	*
Gem Charter School, Inc.	*
George Gervin Youth Center, Inc.	*
Gila Bend Unified District	*
Gilbert Unified District	334
Glendale Elementary District	60
Glendale Preparatory Academy	*
Glendale Union High School District	40
Globe Unified District	44
Grand Canyon Unified District	*
Graysmark Schools Corporation	*
Great Expectations Academy	*
Happy Valley East	*
Happy Valley School, Inc.	*
Harvest Power Community Development Group, Inc.	*
Heber-Overgaard Unified District	*
Heritage Academy Queen Creek, Inc.	*
Heritage Academy, Inc.	*
Heritage Elementary School	*
Hermosa Montessori Charter School	*
Highland Free School	*
Higley Unified School District	171
Holbrook Unified District	*
Horizon Community Learning Center, Inc.	14
Humboldt Unified District	48
Imagine Avondale Elementary, Inc.	*
Imagine Coolidge Elementary, Inc.	*
Imagine Desert West Middle, Inc.	*
Imagine Middle at East Mesa, Inc.	*
Imagine Middle at Surprise, Inc.	*
Imagine Prep Superstition, Inc.	*
Imagine Prep Surprise, Inc.	*
Incito Schools	*
Isaac Elementary District	25
J O Combs Unified School District	80
James Madison Preparatory School	*
Joseph City Unified District	*
Juniper Tree Academy	15
Kaizen Education Foundation dba Discover U Elementary School	*
Kaizen Education Foundation dba Gilbert Arts Academy	*
Kaizen Education Foundation dba Liberty Arts Academy	*
Kaizen Education Foundation dba Mission Heights Preparatory High School	*
Kaizen Education Foundation dba South Pointe Elementary School	*
Kayenta Unified School District # 27	*

District/Charter	Count of Students
Keystone Montessori Charter School, Inc.	*
Khalsa Family Services	*
Khalsa Montessori Elementary Schools	*
Kingman Academy Of Learning	*
Kingman Unified School District	17
Kyrene Elementary District	158
La Tierra Community School, Inc	*
Lake Havasu Unified District	*
Laveen Elementary District	24
LEAD Charter Schools	24
LEAD Charter Schools dba Leading Edge Academy Queen Creek	*
Leading Edge Academy Maricopa	*
Legacy Traditional Charter School	*
Legacy Traditional Charter School - Laveen Village	*
Legacy Traditional Charter School - Maricopa	*
Legacy Traditional School - Avondale	*
Legacy Traditional School - East Mesa	*
Legacy Traditional School - Gilbert	*
Legacy Traditional School - Glendale	*
Legacy Traditional School - North Chandler	*
Legacy Traditional School - Northwest Tucson	*
Legacy Traditional School - Peoria	*
Legacy Traditional School - Phoenix	*
Legacy Traditional School - Surprise	11
Leman Academy of Excellence, Inc.	38
Liberty Elementary District	47
Lifelong Learning Research Institute, Inc.	*
Lincoln Preparatory Academy	*
Litchfield Elementary District	174
Little Lamb Community School	*
Littlefield Unified District	*
Littleton Elementary District	23
Madison Elementary District	43
Madison Highland Prep	*
Maine Consolidated School District	*
Mammoth-San Manuel Unified District	*
Marana Unified District	143
Maricopa Unified School District	61
Mary C O'Brien Accommodation District	*
Maryvale Preparatory Academy	*
Masada Charter School, Inc.	*
Math and Science Success Academy, Inc.	*
Mayer Unified School District	*
Mcnary Elementary District	*
Mesa Unified District	649
Mexicayotl Academy, Inc.	*
Miami Unified District	*
Midtown Primary School	*
Mingus Springs Charter School	*

District/Charter	Count of Students
Mingus Union High School District	*
Mohawk Valley Elementary District	*
Montessori Academy, Inc.	*
Montessori Day Public Schools Chartered, Inc.	*
Montessori Education Centre Charter School	*
Montessori House, Inc.	27
Morenci Unified District	*
Morrison Education Group, Inc.	*
Mountain Oak Charter School, Inc.	*
Murphy Elementary District	*
Nadaburg Unified School District	*
New School for the Arts Middle School	*
New World Educational Center	*
Noah Webster Schools - Mesa	*
Nogales Unified District	*
North Phoenix Preparatory Academy	*
Northland Preparatory Academy	*
Nosotros, Inc	*
Open Doors Community School, Inc.	*
Oracle Elementary District	*
Osborn Elementary District	17
Page Unified District	11
Painted Desert Montessori, LLC	17
Painted Pony Ranch Charter School	*
Palominas Elementary District	14
Paradise Valley Unified District	266
Paragon Management, Inc.	15
Parker Unified School District	20
Patagonia Union High School District	*
Pathfinder Charter School Foundation	*
Payson Unified District	*
Pearce Elementary District	*
Pendergast Elementary District	44
Peoria Unified School District	307
Phoenix Advantage Charter School, Inc.	*
Phoenix Education Management, LLC,	*
Phoenix Elementary District	31
Phoenix Union High School District	90
Picacho Elementary District	*
Pima Unified District	*
Pine Forest Education Association, Inc.	*
Pinnacle Education-Tempe, Inc.	*
PLC Arts Academy at Scottsdale, Inc.	12
Pointe Educational Services	*
Pomerene Elementary District	*
Portable Practical Educational Preparation, Inc. (PPEP, Inc.)	176
Prescott Unified District	37
Prescott Valley Charter School	*
Queen Creek Unified District	111

District/Charter	Count of Students
Ray Unified District	*
Red Mesa Unified District	*
Red Rock Elementary District	*
Reid Traditional Schools' Painted Rock Academy Inc.	*
Research Based Education Corporation	*
Ridgeline Academy, Inc.	*
Rising Schools, Inc.	*
Riverside Elementary District	*
Roosevelt Elementary District	105
Rosefield Charter Elementary School, Inc.	*
Round Valley Unified District	*
Sacaton Elementary District	*
Saddle Mountain Unified School District	16
Safford Unified District	*
Sahuarita Unified District	96
San Carlos Unified District	120
San Tan Montessori School, Inc.	30
Sanders Unified District	*
Santa Cruz Valley Opportunities in Education, Inc.	*
Santa Cruz Valley Unified District	*
Santa Cruz Valley Union High School District	*
Satori, Inc.	*
Scottsdale Country Day School	*
Scottsdale Preparatory Academy	*
Scottsdale Unified District	230
Sedona Charter School, Inc.	*
Sedona-Oak Creek JUSD #9	*
Self Development Academy-Phoenix	*
Self Development Charter School	*
Show Low Unified District	35
Sierra Vista Unified District	111
Skull Valley Elementary District	*
Skyview School, Inc.	*
Snowflake Unified District	24
Somerton Elementary District	*
Sonoita Elementary District	*
Sonoran Desert School	*
Sonoran Science Academy - Broadway	*
Southgate Academy, Inc.	*
St David Unified District	*
St Johns Unified District	12
Stanfield Elementary District	*
Stepping Stones Academy	*
Success School	*
Sunnyside Unified District	138
Superior Unified School District	*
Tanque Verde Unified District	32
Telesis Center for Learning, Inc.	*
Tempe Preparatory Academy	*

District/Charter	Count of Students
Tempe School District	71
Tempe Union High School District	69
The Charter Foundation, Inc.	*
The Grande Innovation Academy	*
The Odyssey Preparatory Academy, Inc.	18
The Paideia Academies, Inc	*
Tolleson Elementary District	12
Tolleson Union High School District	34
Toltec School District	*
Tombstone Unified District	*
Trivium Preparatory Academy	*
Tuba City Unified School District #15	*
Tucson Country Day School, Inc.	*
Tucson International Academy, Inc.	*
Tucson Unified District	691
Union Elementary District	*
Vail Unified District	161
Valley of the Sun Waldorf Education Association, dba Desert Marigold School	22
Veritas Preparatory Academy	*
Vernon Elementary District	*
Victory Collegiate Academy Corporation	*
Villa Montessori Charter School	*
Vista College Preparatory, Inc.	*
Washington Elementary School District	146
Wellton Elementary District	*
West Gilbert Charter Elementary School, Inc.	*
Western School of Science and Technology, Inc.	*
West-MEC - Western Maricopa Education Center	*
Whiteriver Unified District	90
Wickenburg Unified District	12
Willcox Unified District	*
Williams Unified District	*
Window Rock Unified District	118
Yarnell Elementary District	*
Young Elementary District	*
Yucca Elementary District	*
Yuma Elementary District	304
Yuma Union High School District	39

3 Annual Award Amount

This section includes a summary of the annual award amounts associated with students.

As of March 31, 2021, the average annual award amount within the ESA program for active students is \$14,441.39.²

3.1 Recipients by Award Range

Award Range	Count of Recipients
<\$3,000	0
\$3,000-\$3,999	777
\$4,000-\$4,999	1
\$5,000-\$5,999	323
\$6,000-\$6,999	4,639
\$7,000-\$7,999	310
\$8,000-\$8,999	3
\$9,000-\$9,999	3
\$10,000-\$14,999	259
\$15,000-\$19,999	34
\$20,000-\$24,999	164
\$25,000-\$29,999	2,849
\$30,000+	469

² Exited students do not receive any monies and therefore are not calculated into the average awarded amount.

4 ESA Applications

This section includes the number of applications that were received in the previous quarter broken down by those approved and those denied. Information on denied applications includes count by denial justification.

The ESA program received 1,327 applications during quarter 3 (January 1, 2020 through March 31, 2021). All applications received during this time have been processed. By comparison, 904 applications were received in quarter 2.

4.1 Applications by Status

Status of Application	Count of Applications
Approved	1,043
Denied	204
Sibling-waiting on anchor	3
Incomplete	77
Total	1,327

4.2 Denied Applications³

Denial Reasons	Count of Denials
Did not meet AOI hours	19
Did not meet the first 100 days	119
Graduated	1
Non-qualifying STO	2
Incoming Kinder-not assigned to a D/F school	13
Not a Previous Recipient	2
Not a Ward of the Court	0
Not attending a D/F school	28
Not eligible for Kinder	28
Not eligible for Preschool	1
Previously Terminated	7
Sibling is not a current or past recipient	4

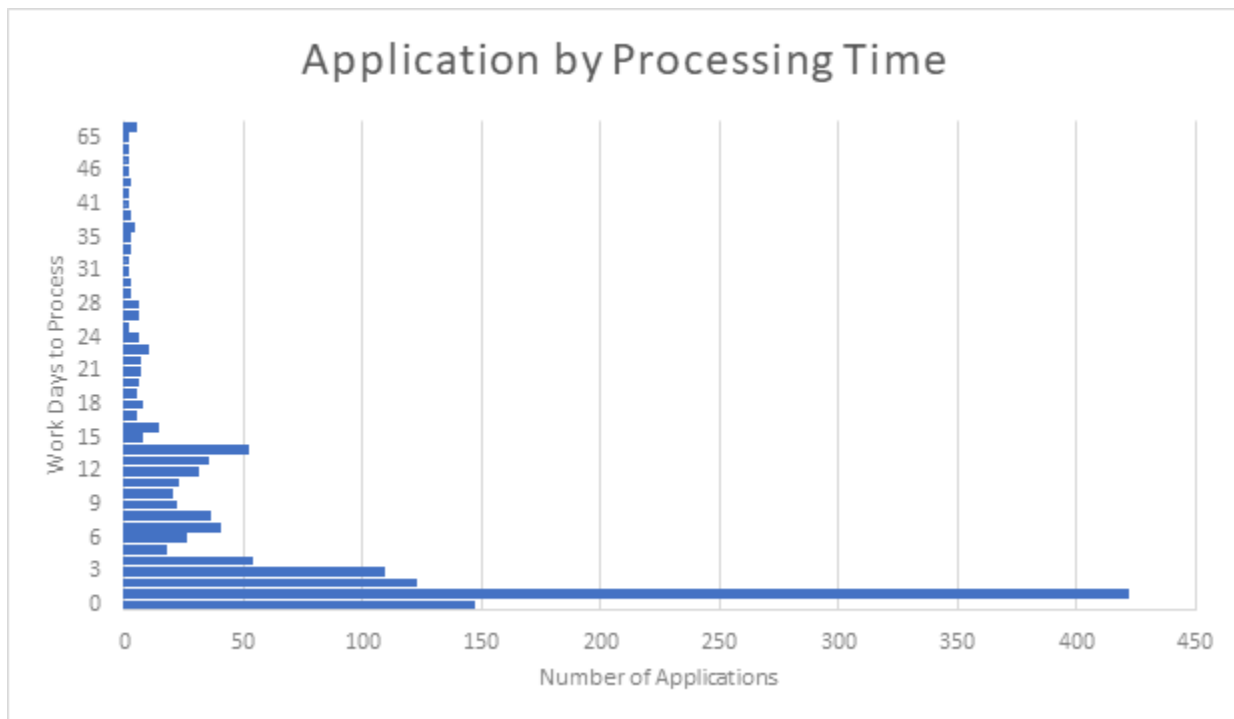
³ There were 204 total denials of which 18 applications have two (2) or more reasons for denial.

5 ESA Applications Processing Time

This section includes the number of applications received in the previous quarter that were processed within 45 days of receipt and the number of applications that were administratively incomplete.

1,327 applications were received during quarter 3 (January 1, 2021 through March 31, 2021), of which 77 were deemed administratively incomplete.

5.1 Applications by Processing Time



	Count	Percentage
Applications processed in less than 45 business days	1,239	99.4%
Applications processed in greater than 45 days	8 ⁴	0.6%
Total Applications	1,247	100%

⁴ Applications greater than 45 days: Due to a limitation in the automated tracking system, incomplete applications continue to be counted from the date of original submission. In all eight instances exceeding 45 days, the application was incomplete causing a delay in processing. Four applications were waiting on military Arizona residency; three applications were waiting for the anchor student to accept contract; one application was put into an incorrect status.

5.2 Incomplete Applications

Status of Application	Count of Applications
Incomplete	77

6 Parent Feedback and Response

This section includes a summary of the parent feedback that has been collected by the ESA program. It also includes a list of current and upcoming action steps to address the feedback shared by ESA families.

6.1 Parent Feedback

The ESA program solicits parent feedback through the following processes:

- ESA Parent Advisory Council
- Written comments
- Electronic surveys
- Ad-hoc meetings

Feedback is collected throughout the year, with both regularly scheduled dates for meetings and comment periods, as well as ad-hoc requests as determined by the Department. Feedback will be reviewed and summarized by the Department and considered before final decision making on the item for which input is being collected. The Department will report to the State Board of Education a summary of the feedback collected and the response or relevant action taken by the Department in its Quarterly Report pursuant to R7-2-1503 (5).

Parent Advisory Council

The Department convened two Parent Advisory Council (PAC) meetings during quarter 3, on January 27, 2021 and March 19, 2021 and included agenda items such as implementation of Prepaid Debit Cards, updates on the private financial management firm, school year 2021-2022 Handbook revisions, and updates on marketing and outreach. A summary of the feedback received is included below. More information about the council, including the council charter, membership and meeting agendas can be found at <https://www.azed.gov/esa/esa-parent-advisory-council>

January 27, 2021 Summary

The January meeting agenda included revisions to the 2021-2022 Handbook, information on the private financial management firm, training for new Account Holders, and an update on outreach and marketing.

Notes from the January 27 meeting are included in Appendix A. The Department also published a “Question and Answer” document in response to the questions received as part of the January meeting. The document is included in Appendix B.

The following comments were shared by council members regarding the Handbook:

- Clean up the grammar and clarity of writing in the handbook
- State what is an acceptable version of a credential if “not a screenshot” is the policy
- Define dual enrollment regarding paying college tuition
- SLAs (service-level agreements) for CW to pay providers, to respond to help requests from providers, and to respond to requests from parents
- Educate in 5 required subjects does not mean spend in those subjects
- Misspending or hacked card: funds should be returned to that student
- Explain Zoho signup for help desk in the handbook so people don't get locked out of getting help
- Lifetime access to curriculum needs to be allowed in the age of online learning
- Out-of-state and sports camps should be allowed if taught by a qualified tutor. The statute does not exclude these.
- Can ESA materials be shipped to a temporary address that is out-of-state

The following comments were shared by council members regarding training provided by the private financial management firm:

- Representatives need to introduce themselves and explain their role at the firm
- The training needs to be interactive and participatory
- Representatives need to have a plan to address concerns of ESA parents and not prevent parents from asking questions
- Representatives need to explain how they are protecting student rights to privacy (FERPA) and how they protect banking information of parents and vendors
- Representatives need to realize that they are supporting parents of children with special needs
- Training needs to be offered outside of business hours for parents who work then

March 19, 2021 Summary

Minutes from the March 19 meeting are included in Appendix C. The feedback provided by council members and stakeholders fell into the following categories:

- Consistency by ESA program staff regarding expense approval
- Timeliness of expense approval
- Communication regarding program changes
- Assistive technology/Associate Goods policy implementation
- ClassWallet concerns
- Debit Card questions
- Reimbursement Concierge

Written Comments

During quarter 3, the Department solicited written comments related to the proposed revisions to the School Year 2021-2022 Parent Handbook. In addition, ESA stakeholders were provided an opportunity to submit written comments to the Parent Advisory Council in advance of the meetings held during quarter 3.

January 27 Parent Advisory Council Meeting

Number Submitted: 67 written comments submitted and shared with the PAC members

Summary: Written comments submitted through the form included concerns and requests such as:

- Features and functionality in ClassWallet
- Timeliness and consistency in customer service by ESA program staff and ClassWallet
- The need for more customized training on using the program and the ClassWallet platform
- Debit cards
- Timeliness of refunds
- Vendor registration in the ClassWallet platform
- Privacy
- Timeliness, efficiency, equity of reimbursement and concierge

SY 2021-2022 Parent Handbook

Number Submitted: 19 written comments submitted

Summary: Stakeholders were able to submit written comments through an online form between January 18 and February 3. A summary of feedback received was provided to the Board at its March 26 meeting. The presentation is attached in Appendix D.

March 19 Parent Advisory Council Meeting

Number Submitted: 2 written comments submitted and shared with the PAC members

Summary: Comments related to the need for a debit card option and request for streamlined processes for purchasing associated goods.

Electronic Surveys

The Department continues to provide a survey link to all tickets received through the Department's HelpDesk for families to provide feedback on the timeliness, completeness, quality, and helpfulness of the response regarding their request. Families are also given an opportunity on the survey link to provide general feedback. During quarter 3, the Department received 168 responses to HelpDesk-linked surveys.

The Department also continues to allow families to provide general program feedback through a survey available on the ESA website. This survey focuses on the ESA program, banking systems, ease of navigating the ESA website/portal, customer experience with the private financial management platform, and overall ESA communication. A total of 30 responses were submitted during quarter 3 through this form.

Feedback and concerns raised in the surveys include:

Expense Reporting and Approval

- Difficulty filing expense report before speaking directly with a specialist
- Inability to purchase a service animal
- Questions are not answered fully, are vague, and unaccountable
- Responses are at times quoted directly from the handbook
- Staff needs better training
- HelpDesk can be confusing
- Timeliness for approvals
- Process for approvals
- Requests are not read, missing responses to some
- Provide better instructions when something is rejected
- Escalating basic questions when staff member should know
- List of approved expenses is too small
- Provide better instructions when something is rejected

ClassWallet

- Inability to use coupons or sales for vendors in the platform
- Inability to upload supporting documents at the time of request for purchase approval
- Amount of time to credit accounts for refunded purchases

All respondents who provided their contact information were contacted by a representative from the ESA program to address outstanding issues raised in their survey response.

Additional information regarding the survey results is available upon request.

Ad-Hoc Meetings

The Department did not convene ad-hoc meetings during quarter 3. Two virtual town hall meetings were convened in quarter 4, on April 19. A summary of these meetings and the Department's response will be included in the upcoming quarter 4 report.

6.2 ADE Response to Feedback

In response to parent feedback regarding consistency and timeliness of the expense approval process, the ESA program team is undergoing continuous improvement for processes and procedures and is conducting ongoing staff training. In addition, the Department continues to review and update its communications strategy for sharing information with prospective and existing Account Holders.

In response to parent feedback regarding functionality and service provided by the private financial management firm, the Department is working with the firm on the following enhancements:

- The private financial management firm is currently developing comprehensive account statements. The firm estimates account statements will be accessible in May.
- The Direct Pay vendor list in the financial management platform is now updated daily as vendors are approved and following verification of account information. The Department has requested a solution for sorting vendors in the platform by service/good and location.
- Updates to the platform to allow Account Holders to attach documents with orders for approval.
- Customized Merchant Category Codes (MCC) based on student qualification to allow eligible Account Holders to use a debit card for Assistive Technology.

In response to parent feedback concerning the need for additional purchasing options outside the financial management platform, the Department worked with representatives from the State Treasurer's Office and the private financial management firm to provide a debit card option beginning in quarter 1 of school year 2021-2022. All Account Holders will be eligible to request a prepaid debit card in the ESA portal beginning May 15, 2021.

In response to parent feedback regarding implementation of the Associated Goods (Assistive Technology) policy, the Department revised its policy and procedure for review and approval of Associated Goods for students with disabilities. The new policy:

- Maintains the requirement for Account Holders to provide documentation of the special education course of study, service, or other educational need with which the good or service is associated.
- Removes the additional requirement for the Account Holder to provide documentation directly linking the requested associated good or service with the documented special education need.
- Specifies that Account Holders are not advised to contact their Districts seeking to update or change their students' individualized education programs (IEP) or request special education reevaluations for the purpose of making ESA purchases.

7 Private Financial Management Firm

This section includes information on the private financial management firm assisting in the management of the program and includes:

- a) The number and eligibility type of accounts utilizing the firm
- b) The number of providers and vendors on the firm's platform
- c) Communications and trainings provided to parents
- d) Concerns from parents submitted to the Department, the treasurer, and the private financial management firm and how the Department, Treasurer and private financial management firm are addressing the concerns
- e) Any other information the Board requests

7.1 Accounts by Firm

Eligibility Category	Bank of America Count of Students	ClassWallet Count of Students
Attending D/F School	68	384
Legally Blind/Deaf/Hard of Hearing	10	31
Military	279	755
Previously in ESA Program	23	65
Residing on a Native American Reservation	54	316
Sibling	330	1,146
Special Needs	1,659	4,195
Ward of the Court	114	401
Exited ⁵	145	21
Total	2,682	7,315

7.2 Providers and Vendors

As of March 31, 2021, there are currently 1,582 vendors/providers in the ClassWallet application. By comparison, there were 1,339 vendors/providers registered in the platform during quarter 2.

7.3 Communications & Trainings

The private financial management firm, ClassWallet, facilitates training for parents who use the platform to spend ESA monies. In addition, the Department is currently developing a short training video to make available on the ESA website that is specific to the Arizona ESA program.

⁵ Exited students are included, as these students have opened accounts in ClassWallet or Bank of America.

Training will be available throughout the year. Training sessions are offered in the am and pm to provide flexible options for participation. Recorded sessions will be made available on the ESA website.

Previously recorded training videos, upcoming training dates and registration information will be made available on the ESA website at <https://www.azed.gov/esa/classwallet>

7.4 Parent Concerns and Responses

There was no information submitted to the Department by the Treasurer's Office nor ClassWallet for this section for quarter 3. Parent concerns regarding the private financial management firm that were addressed directly to the Department and a summary of the Department's response are included in this report beginning on page 14 of the Parent Feedback and Response section.

7.5 Other Requests

At the January 2021 Board meeting, the Board provided feedback on the database of approved expenses. Pursuant to rule, the Department is required to establish and maintain a database of approved expenses and disallowed expenses for the current and upcoming fiscal years. The Department shall make the database available to parents online and disaggregate the approved expenses by eligibility category.

The Board expressed concern with the format, legibility, and lack of ability to search items by name or category in the previously published database. In response to Board and parent input, the Department has published a searchable database of allowable items. You can search for various items by entering a keyword in the "Expense Field." You can also filter by Determination, or Expense Category. The database will pre-populate suggestions and include a link to the item. The database is updated at least monthly and includes allowable items that have been previously reviewed and approved by the ESA program. Information on expenses not listed in the database and a list of items that are disallowed is included in the Parent Handbook.

The database is available on the ESA website at <https://www.azed.gov/esa/esa-allowable-items>. The Department will continue to make enhancements to the form and functionality of the database to improve accessibility.

APPENDIX A



Arizona Department of Education
Empowerment Scholarship Account (ESA)
Parent Advisory Council
Wednesday, January 27, 2021
9:00 am to 12:00 pm

Meeting Minutes

Council Facilitator: Carrie Schreiner

Council Members	Attendance
Kathy Boltz – Council Chair	Present
Tanya Brodd	Present
Elianta De Paula	Present
Glendaliz Felix-Wooddisse	Present
Allison Gentala	Present
Chauncey Hallford	Present
Gretchen Jacobs	Present
Vanessa Long	Absent
Angella Mundle	Present
Kayla Svedin	Present
Tracy Tanner	Absent

NOTE: *Order of agenda items may be subject to adjustment, as needed, by Council Facilitator.*

Item #	Topic	Speaker:	Discussion
I 9:00 am	Welcome <ul style="list-style-type: none">Opening of Meeting<ol style="list-style-type: none">Discuss webinar platformReview group norms	Carrie Schreiner	Started at 9:02am Agenda on screen and posted on ESA Parent Advisory Council website Platform for meeting is new Chat has been disabled, please raise hand if you would like to share

			<p>Breaks will occur during meeting as needed</p> <p>Attendees that have submitted a request to speak will be managed by Sofia to be able to unmute at the public comment time; Each speaker will have 3 minutes to speak</p> <p>Review of group norms – created by council during first meeting; the group should hold themselves accountable for following the group norms</p> <p>Order change in agenda, due to time constraints on feedback for handbook, that will occur first to ensure time to discuss before moving to other items.</p>
II. c	<p>Revisions to the Parent Handbook for SY 2021-2022</p> <ul style="list-style-type: none"> <u>Request of Council:</u> Review proposed changes and provide input and recommendations on revisions to the 2021-2022 ESA Handbook based on the user perspective. Consider the following questions for discussion: <ol style="list-style-type: none"> What needs to be clarified in the handbook? What needs to be added to the handbook? 	<p>Karla Escobar Mike Mannelly Kathy Boltz</p>	<p>Karla and Mike will lead discussion</p> <p>Mike: background and discussion of ESA program, rules coming from SBE noting that handbook must be presented to SBE by March 1 annually and the SBE must approve by May 1 each year. Rules of SBE must align with state statute and clearly identify changes. The purpose is to provide families information about the program, processes, policies. Red line version of the handbook has been provided and will share.</p> <p>Organization of handbook:</p> <ul style="list-style-type: none"> Cover page Table of contents Introduction Spending and program requirements ESA bank cards Expense reports Contracts Contracts Why termination occurs Leaving the ESA program Quick reference/help <p>The new handbook is structured similarly but the Table of Contents has not been updated yet.</p> <p>Pages 1-7 cover page and quarterly dates</p> <ul style="list-style-type: none"> Applicant parents are identified as account holders Changes noting deadline dates for ClassWallet and ClassWallet is incorporated References to SBE Website information

- Secure information and handling prepaid bank cards
- Detail about the allowability of how things can be paid for during the same contract year rather than same quarter

Any comments to share?

Whitney – we did not do introductions at the beginning, are people able to unmute themselves? We have received feedback from several council members in writing on the handbook, but we would also like to have a dialogue in this meeting

Carrie – we’ll do a quick round of introductions; due to an issue with the Zoom webinar, we can’t do video for this webinar

Introductions

The council members and ADE staff briefly introduced themselves and their role.

Discussion Summary

Due to the way the meeting was set up, the video function is turned off and chat and Q and A are not available. It was decided that all participants would log off so these settings could be changed and then would rejoin the meeting at approximately 9:30am.

Meeting resumed at 9:32 am

Discussion Summary

A council member expressed concern with recent communication efforts with the ESA program staff. ADE noted the issue and Karla will follow up.

Carrie – it looks like we have almost everyone back, we’ll start again. We did introductions, thank you for pausing and allowing us to restart, asked colleagues to take note on chat and pause when needed; raising hands is still good

An additional council member joined and introduced themselves.

Resumed discussion of ESA handbook and screenshared red-lined version that was shared with council members and posted on the ESA website.

Karla discussing

		<p>Minor changes to align with current rules/statute</p> <p>Noting that ESA accounts cannot be crisscrossed between students</p> <p>What can be paid for fees, rentals, lab fees, no major changes</p> <p>Clarifying kindergarten enrollment</p> <p>Not accepting teaching certificate screenshots</p> <p>Clarified some content in allowable purchases</p> <p>Discussion Summary</p> <p>One of the council members asked about the purchase of AC devices and whether they require documentation on an IEP. Karla shared that if an IEP or evaluation indicates that such an item is needed, it would be allowed but the simple need of a computer or device that does not related to a child's IEP is not allowable.</p> <p>Fees from bank of America for lost or stolen cards and shipping</p> <p>Note about post-secondary tuition and exiting K-12 education</p> <p>Educational Therapies, not an exhaustive list but a list of the most common ones</p> <p>Requests for approval should go through HelpDesk ticketing system, allows for better follow-up</p> <p>Associated goods part is aligned to statute and language is used from policy and rules</p> <p>Discussion Summary</p> <p>A council member asked for clarification about what is required in order for assistive technology to be allowable expenses. Karla shared that for all associated goods, a special education plan or course of student would need to be submitted so it can be verified that it is connect to the IEP or special education plan. An evaluation could be an acceptable replacement for an IEP or special education plan as long as a qualified special education provider will speak on the behalf.</p> <p>A council member questioned why Bank of America information is included in this handbook if they will be phased out in July. ADE clarified that there will be</p>
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some overlap time between when this handbook is released and when Bank of America cards are phased out.

Possibilities of a card option through ClassWallet are being explored but the guidelines for that card could differ from those referenced in the handbook for Bank of America cards depending on the circumstances and details of the card.

A council member expressed concern that parent groups have not been included in the card discussions with ClassWallet thus far and would like ClassWallet to have a representative attending ESA Parent Council meetings. Additional ClassWallet discussion will occur with that agenda item.

The below comments were collected by council members and shared.

- Clean up the grammar and clarity of writing in the handbook
- State what is an acceptable version of a credential if “not a screenshot” is the policy
- Define dual enrollment regarding paying college tuition
- SLAs (service-level agreements) for CW to pay providers, to respond to help requests from providers, and to respond to requests from parents
- Educate in 5 required subjects does not mean spend in those subjects
- Misspending or hacked card: funds should be returned to that student
- Explain Zoho signup for help desk in the handbook so people don't get locked out of getting help
- Lifetime access to curriculum needs to be allowed in the age of online learning
- Out-of-state and sports camps should be allowed if taught by a qualified tutor. The statute does not exclude these.
- Can ESA materials be shipped to a temporary address that is out-of-state?

Council member noted that it would be helpful if the handbook included processes not just policy and included examples.

All comments were noted by ADE staff and will be taken back to ESA staff working on the handbook.

Change in disability category – moved these items to fit more with other content

Mis-spending page was moved to another section

Removed outdated language

Handling of card, reimbursement not an option

Clarified some content about ClassWallet

Removed unnecessary/ confusing language

No submission of quarterly reports

Added associated goods category

Align with rules from SBE

Moved language and added current categories in ClassWallet and define what it is

Expense reports schedule to clarify

Call for questions

Discussion Summary

Questions are being rapidly shared in chat, too quickly to address them all. Suggestion that questions be reviewed later, and an FAQ document be posted to address them. Questions were largely concentrated on ClassWallet and a council member suggested that a meeting or forum for those questions should be considered.

Determined that the feedback prepared by the council members would be shared.

- Clean up the grammar and clarity of writing in the handbook
- State what is an acceptable version of a credential if “not a screenshot” is the policy
- Define dual enrollment regarding paying college tuition
- SLAs (service-level agreements) for CW to pay providers, to respond to help requests from providers, and to respond to requests from parents
- Educate in 5 required subjects does not mean spend in those subjects
- Misspending or hacked card: funds should be returned to that student

			<ul style="list-style-type: none"> • Explain Zoho signup for help desk in the handbook so people don't get locked out of getting help • Lifetime access to curriculum needs to be allowed in the age of online learning • Out-of-state and sports camps should be allowed if taught by a qualified tutor. The statute does not exclude these. • Can ESA materials be shipped to a temporary address that is out-of-state? • Subscriptions that would cross into the next year • If you have signed a contract you should be able to pay in the spring/summer to reserve space for the fall – some mechanism to allow payment across contract years <p>Moving on to ClassWallet next.</p>
II. a 9:05 am	ClassWallet <ul style="list-style-type: none"> • ClassWallet Background <ol style="list-style-type: none"> 1. ADE staff will provide the council with background information regarding the relationship between ADE, ClassWallet and the Arizona Office of the Treasurer • ClassWallet Training Content <ol style="list-style-type: none"> 1. <u>Request of Council:</u> Review the training slides from ClassWallet and consider the following questions for discussion: <ol style="list-style-type: none"> a. What content should be added? b. What points need further clarification? 	Whitney Marsh Karla Escobar Mike Mannelly Kathy Boltz	Discussion Summary Council members shared the below comments <ul style="list-style-type: none"> • CW representatives need to introduce themselves and explain their role at CW • The training needs to be interactive and participatory • CW representatives need to have a plan to address concerns of ESA parents and not block these parents from asking questions • CW needs to explain how they are protecting student rights to privacy (FERPA) and how they protect banking information of parents and vendors • CW needs to realize that they are supporting parents of children with special needs • CW training needs to be offered outside of business hours for parents who work then <p>The council members also shared concerns with the interaction with ClassWallet on the first training. ClassWallet representatives were not very personable and did not address individual questions. A generic video was shared that did not reflect the rules of the ESA program and questions were responded to with broad copy and paste answers. Parents were left very dissatisfied. With the FERPA concerns that are relevant to ESA clients unlike other ClassWallet clients, that needs to be addressed in training specific to ESA.</p>

ADE clarified that the treasurer's office holds the contract with ClassWallet and was responsible for releasing the RFP and awarding the contract. ADE works with that office to communicate needs because ADE manages the ESA program. There are daily talks with ClassWallet and all issues that come in are being escalated appropriately. In an effort to minimize disruption where possible the last phase for ClassWallet transition was delayed. Debit card options with ClassWallet are being actively explored. There seems to be a lot of interest in have a forum for everyone related to ClassWallet, should that be part of the next Advisory Council meeting or would separate town halls work better? Council member suggested that feedback continue to be collected through public comment link and then that be distilled down into talking points and shared with ClassWallet at the next Advisory Council meeting. It was also suggested that having an Advisory Council meeting focused on parent feedback could be helpful with a ClassWallet representative attending. A Council member suggested that all ESA families and vendors/providers be emailed with the public comment link included. Vendor outreach is important for ClassWallet to be successful.

Service Level Agreements for ClassWallet were suggested as a way to specify expectations since the contract is held by the treasurer's office not ADE. Other vendors could be a possibility, but Bank of America is not one as they are ending the use of that program with the entire State of Arizona.

A council member suggested that ClassWallet should bear some of the responsibility for outreach to vendors. ADE noted that there is an endless list of vendors and ClassWallet nor ADE does not know everyone to reach out to. Some states with similar programs are more restrictive and instead require participants to use a set list of providers.

The council members asked if the upcoming marketing plan included outreach to vendors or school districts. No, the marketing plan is for families.

Noted that ClassWallet cannot answer questions about allowability of purchases. Due to the flexibility in the way that ESA funds can be spent, ClassWallet and other vendors would not be able to review expenses for allowability because the program is not black and white enough to have built in restrictions. The ESA program is more complex than the platform is built to do.

ClassWallet communications lack a personal nature. Emails do not have a signature and staff seem frustrated and annoyed when parents call. Other

			<p>parents shared issues connect with staff at ClassWallet at all. There seems to be a lack of basic customer service.</p> <p>A council member noted that one of the big concerns with the delays encountered working with ClassWallet is that parents have to spend time away from providing services to their children and it may cause a lapse in services.</p>
II. b	Outreach and Marketing <ul style="list-style-type: none"> <u>Request of Council:</u> Review the outreach and marketing plan and consider the following questions for discussion: <ol style="list-style-type: none"> What are the most effective communication methods for reaching prospective families in your community? What strategies would you recommend to target marketing to your geographic location? To your child's eligibility category? 	Whitney Marsh Kathy Boltz	Whitney Presenting Allocation for this fiscal year to do marketing and outreach on the program and target rural communities, plan provided to members for review, comments provided in an excel sheet. Question on RFP and who was hired, with the procurement process and short time window, we can go to someone who is already on state contract, under a certain dollar amount you do not need to go to RFP. Checked with educational contacts about any recommendations for marketing/publications, see if anyone had worked in education space. 3 or 4 recommendations, a couple were on state contract already. Went with Fervor Creative and we are in the planning stages now and going through the plan that was shared with the expectation that things would be pushed out in March. Break and will resume at 10 after
III 11:15 am	External Stakeholder Comments <ul style="list-style-type: none"> Speaker order: <ol style="list-style-type: none"> Tamara Kumpfmiller Patricia Wilson Tammy Clayton Lisa McCarville Julie Batt Jennifer Castellanos Kathy Visser 	Kathy Boltz	Due to the private nature of the situations and circumstances that were shared as part of this public comment period, this section has been summarized below. <ul style="list-style-type: none"> Thankful for the ESA program Issues with ClassWallet (vendors unwilling to sign up, refund issues, long wait times for approval, reimbursement challenges with family finances) Concerns that ClassWallet does not give children full access to their funds Debit card would allow for broader access ClassWallet training talked about items that are not allowable and did not answer or respond to all questions Concerned that there is not a secure card option; reimbursement and concierge do not work for everyone Very thankful for the ESA program but concerned about the impact of moving to ClassWallet and losing out on established services/tutors ClassWallet does not provide options to allow for post-secondary classes

			<ul style="list-style-type: none"> • Difficult for parents not yet on ClassWallet to understand what future options may be available • Long wait time for new recipients which is detrimental for students going into ESA mid-year • Reimbursement is not a feasible option for all families • Reimbursement should be extended for 30 days after the quarter • Deadlines for application on the website are confusing and should be removed • Database of approved expenses should be legible, useable, sortable, and searchable • ClassWallet should update vendor section to include location of services • Pre-paying for tuition should be an option • Camps should be allowable • ESA should allow for approved AZ gun safety courses • Grateful for program and educational flexibility • ClassWallet does not live up to the expectations parents had when advocating for such a system; was under the impression, debit cards and writing checks would be an option • ClassWallet is clunky and terrible to navigate and processing is not smoother or faster; can't see how funds have been spent • Concern about the way ClassWallet was selected since lobbyists emailed about it before RFP • ClassWallet could not complete a concierge request and offered to Venmo parent or send gift card • Believe that ClassWallet is not a good option and a card with good options would eliminate the opportunity for fraud and better serve students • Issues with vendor sign up and requirement to have an online website
IV 11:45 am	Announcements <ul style="list-style-type: none"> • Future meeting dates and items for discussion <ol style="list-style-type: none"> 1. March 2021 <ol style="list-style-type: none"> a. ClassWallet transition b. Assistive Technology/Associated Goods 2. May 2021 <ol style="list-style-type: none"> a. ClassWallet transition 3. A poll will be distributed to find the date and time that 	Carrie Schreiner	<p>Carrie – want to provide more opportunity for parent feedback at March meeting</p> <p>Next meeting after March meeting is currently scheduled for May but if need for another meeting arises, we will let folks know.</p> <p>Wanted to highlight that based on feedback we will send out a poll to get best dates and times to council members.</p> <p>Kathy – the slide lays out the thoughts of the panel members</p> <ul style="list-style-type: none"> • Clean up the grammatical and clarity issues of the handbook • Address the council's concerns about the handbook <ul style="list-style-type: none"> • Explain what has been updated

	works best for members for each meeting.	<ul style="list-style-type: none"> • Explain what has not been updated and why • Ensure that refunds are returned to student accounts and explain how this will happen • CW representative attend March council and present card options to: <ul style="list-style-type: none"> • Support ESA students with complex spending • Empower the education of ESA students and ease access to educational options • Avoid lapses in education for ESA students with complex spending • Support purchases at small businesses in AZ • Get refunds returned to the students. • Set SLA (service-level agreement) for the timelines. <p>Concern about refunds in ClassWallet not being returned to student account. Monthly statements would be very helpful</p> <p>Another meeting will not occur before the handbook is submitted to SBE but ADE can provide Council members with that draft.</p>
V 12:00 pm	Adjourn & Close Meeting	Carrie – thank you for everyone’s patience and please let me know if you have questions.



Empowerment Scholarship Account (ESA) Parent Advisory Council Question and Answer

January 27, 2021 Meeting

General Questions

1. What happens to the written comments submitted to the Parent Advisory Council?

Response: All written comments received at least 48 hours prior to the council meeting were shared with the council members prior to the meeting. All comments received after that time were shared following the meeting.

In addition, ADE staff will review every submitted comment and provide a summary and response to the State Board of Education as part of the Quarterly Report process. Quarter 3 will be submitted in April 2021. Quarterly Reports will be published and accessed from the ESA Quarterly Report tab on the ESA website at <https://www.azed.gov/esa>. Personally identifiable information will be excluded from the reports to the board.

2. My Bank of America card expires in May; will I get a new one to use until July?

Response: Bank of America will automatically send you a new card 30 days prior to your current card expiring. In some cases, cards do get lost in the mail, if this is the case, please contact Bank of America at 1-866-213-4074.

3. Do I have to submit an expense report if no expenses were made in the quarter?

Response: An expense report is not required if no expenses were made in the quarter. However, a parent is required to attest that no expenses were made in a particular quarter by clicking on No Expenses in ClassWallet or the ESA Portal (for bank card holders).

4. Do staff automatically send reminder emails that expense reports are due and notification they are received?

Response: Yes, the ESA Portal begins to send automatic notifications to the email on file 15 days prior to the due date (with additional reminders in between) until the expense report is submitted and received by ADE.



Allowability

5. Does a complete list exist that parents can have access to that details every allowed extracurricular, ex, music, dance, horsemanship etc.?

Response: The ESA Parent Handbook provides guidance on some of the allowable extracurricular activities, but there is not a complete list of every allowed activity.

6. Is there a way to get a more organized list of already approved items?

Response: The ESA team is working with ADE IT to identify options for displaying the list on the website that allows for sorting and filtering based on category of expense type.

7. If I am a continuing account holder, can I advance pay tuition and fees for private school, summer school or tutoring services to take advantage of discounts for early payment?

Response: Yes, but should you decide not to renew your contract for the new school year, you may be required to repay the early payments.

8. Can a student with special needs enrolled in a private online school use funds to purchase a laptop?

Response: A student with a disability may be able to purchase a laptop (associated goods) with his/her ESA monies if the special education plan shows the need for such associated good.

9. Can a student receive speech services while on the ESA?

Response: A student with a disability can use ESA monies to pay for speech services.

10. Can a student receive speech services at a public school and pay with pay ESA funds?

Response: A student with a disability may use ESA monies to pay a public school for speech services. However, the public school is not obligated to provide these services even if the parent is paying for them.



11. How can I purchase assistive technology (i.e. laptop) if my student does not have a current IEP or MET? If a letter from a qualified professional is permissible in place of an evaluation, what is considered a “qualified professional”?

Response: The Department will accept a letter or independent evaluation from a qualified special education professional that shows the need for the associated good(s).

The Qualified Professional List can be found at

<https://www.azed.gov/sites/default/files/2018/02/Revised%20QP%20List%208%2027%2018.pdf?id=5a8334f03217e1105cc4b9bc>

12. Can a spouse of an ESA parent sign up to become a provider (i.e. tutoring services) if currently certified?

Response: A spouse of an ESA parent can become a provider (i.e. tutoring services), but a parent cannot pay their spouse with their child’s ESA monies to provide services.

ClassWallet

13. How do I access my child’s account in ClassWallet?

Response: A student’s ClassWallet account can be accessed through student’s account via the ESA Portal by clicking on the blue button *Go to ClassWallet Account*.

14. What is the process for getting a refund and what is the expected timeline? Who do I contact with questions regarding a refund?

Response: Refunds are generally issued upon proof of vendor credit. If an account holder brings a refund to the attention of a ClassWallet representative, it may be credited in real-time. Refund questions can go to help@classwallet.com. Otherwise, ClassWallet will credit upon notification from the vendor which varies by vendor from weekly to monthly.

15. How do I pay for college tuition in ClassWallet if the institution is not registered as a vendor?

Response: A parent may pay for college tuition in ClassWallet by using the Concierge Service.

16. How would parents on class wallet pay for dual enrollment? Community colleges and universities are not vendors.

Response: A parent may pay for dual enrollment at a community college or university in ClassWallet by using the Concierge Service.



17. How many students are using ESA funds to pay tuition at community colleges or universities?

Response: 133 students are identified as reporting some sort of post-secondary expenses. This can range from textbooks/books through Amazon, a bookstore, etc. to college or university tuition. This information is self-reported.

18. How do I pay tuition at a private school that is not registered in ClassWallet?

Response: If a private school is not currently registered in ClassWallet, ESA staff is available to assist the school to get them registered and set up in ClassWallet.

If a private school prefers to not register, a parent may pay out of pocket and request a reimbursement through ClassWallet.

19. Can ADE have ClassWallet for tuition payments only and still allow debit cards for the other 20% of expenses?

Response: ADE is currently working with the State Treasurer's Office and ClassWallet to offer additional purchasing options through the ClassWallet platform. Any changes to current offerings will be communicated with all account holders as soon as possible.

20. CW has run into "purchase limits" on Amazon because the purchases are all going through a specific CW payment option, right?

Response: There is no purchase limit at Amazon for ClassWallet. ClassWallet has multiple cards linked to the Amazon account and has previously encountered holds on one or more linked card. As soon as the issue is identified, resolution is quick and held orders are processed by Amazon automatically.

21. Will vendors be included in the marketing plan for ESA?

Response: Not directly. The marketing and outreach plan for Spring 2021 targets families with students eligible for the ESA program.

22. Who is responsible for getting vendors signed up in ClassWallet?

Response: Prior to transition to the platform, ADE provided ClassWallet a list of vendors and private schools used by account holders. ClassWallet contacted the vendors and schools and registered the ones for which ESA had complete information on. ClassWallet does not have access to personal information for individual providers. Parents can share with their providers



the link below to have them register in ClassWallet. In addition, ClassWallet accepts inbound inquiries and conducts outreach with concierge vendors.

<https://app.smartsheet.com/b/form/f0dea2798798406fbe43c835cf38fbb3>

23. How can a vendor get immediate assistance with registration?

Response: The easiest and quickest way to reach ClassWallet is through our customer support lines (email: help@classwallet.com, phone: 877-969-5536 and chat)

24. What are the terms of service for vendors in ClassWallet?

Response: TERMS OF SERVICE for Vendors are included at the end of this document.

25. How does ClassWallet protect personal information? Are there security measures in place to make sure only the account holder can get information about an account?

Response: ClassWallet limits the collection and storage of personally identifiable information, but where it is collected, ClassWallet encrypts data in transit and at rest. ClassWallet holds themselves to industry standards and is SOC compliant, audited annually by a third-party auditor. For more info about protecting personal information see this FAQ General questions about security at <https://kleo.force.com/classwallet/s/article/Why-your-data-is-super-secure-when-you-apply>

Before speaking about an account over the phone, ClassWallet confirms the parent's name, child's name and email associated with the account.

26. How does a service provider know what student the payment is for when it comes from ClassWallet?

Response: ClassWallet sends the invoice including the transaction ID, user data and transaction amount. The provider can match the order ID to the user's transaction to identify the student the payment is for. The provider also has access to their own ClassWallet account with all the transaction data for their accounts.

27. Is there a restriction on how many times the concierge service can be used per quarter?

Response: There are no limits on concierge service per quarter or per year.



ClassWallet Terms of Service

These TERMS OF SERVICE (these “Terms”), are entered into between Kleo, Inc., a Delaware corporation doing business as ClassWallet (“ClassWallet”) and you or, if you represent an entity or other organization, that entity or organization (in either case “you” or “You”). These Terms include and incorporate by reference, the general website terms of use found at <https://www.classwallet.com/terms-of-use> (“Terms of Use”). All references herein to these “Terms” shall include the terms and conditions of the Terms of Use and shall be deemed to apply to these Terms as a whole. To the extent you are not already bound by the Terms of Use, by entering into these Terms, you agree to be bound by the terms and conditions of the Terms of Use.

ClassWallet provides certain services relating to payment for services (the “Services”) through its web site located at <http://www.classwallet.com> (the “Site”). A person or entity that provides services or products (“Provider”) may register for an Account to receive payments from other users. As a Provider, all access to and use of the Services available through the Site is subject to these Terms. If You wish to access and use the Services and the Site as a Provider, You may do so only in compliance with these Terms.

Without limiting the foregoing, the Services are not available to individuals under the age of 18 or who do not meet any of the other qualifications included in these Terms.

PLEASE CAREFULLY READ THESE TERMS. BY AGREEING TO THESE TERMS OR BY ACCESSING OR USING THE SITE OR SERVICES, YOU AGREE THAT YOU HAVE READ AND AGREE TO BE BOUND BY THESE TERMS AND THE TERMS AND CONDITIONS OF THE ACCEPTABLE USE POLICY.

IF YOU DO NOT AGREE TO THESE TERMS, OR DO NOT MEET THE QUALIFICATIONS INCLUDED IN THESE TERMS, CLASSWALLET IS NOT WILLING TO PROVIDE YOU WITH ACCESS TO OR USE OF THE SITE OR SERVICES AND YOU MUST NOT ACCESS OR USE THE SITE OR SERVICES. IF YOU ACCESS OR USE THE SITE OR SERVICES, YOU ACKNOWLEDGE THAT YOU MEET THE QUALIFICATIONS INCLUDED IN THESE TERMS AND AGREE TO BE BOUND BY THESE TERMS.

These Terms are entered into as of the date You first access or use the Services or Site (the “Effective Date”). Each time You use the Site, You reaffirm Your acceptance of the then-current version of these Terms.

1. DEFINITIONS. Any terms not defined in these Terms will have their plain English meaning as commonly interpreted in the United States.

2. ACCESS TO THE SERVICES. To use the Services on the Site you are required to establish and maintain an account on the Site (“Account”). In connection with these Terms, You have applied to establish an Account. Approval of Your Account is at the sole discretion of ClassWallet. If you are approved to open an Account, you will also be required to create and maintain a profile for Your Account (“Profile”). In connection with establishing Your Profile, or accessing or using Your Account, You will be asked to submit certain information about yourself and, as applicable, your organization. You agree that: (a) all such information You provide will be accurate, complete,



and current; (b) You will maintain and promptly update all such information to keep it accurate, complete, and current; and (c) You will not provide any information belonging to any other person or organization with the intent to impersonate that person or organization. You authorize ClassWallet to share all such information in your Profile with our affiliates and with all other Users.

You authorize ClassWallet to verify any of the information You provide in Your Profile or otherwise through the Services, including to confirm Your identity, Your eligibility to access and use the Services. You acknowledge that we may use third parties, government authorities, and other sources of information as we may deem appropriate for any such verification. Nothing in these Terms requires us to verify Your identity or the identity of any other User, and we do not warrant or represent to You that we have verified the identity of, or other information regarding, any other User.

You will be provided with a user identification and password applicable to the Account ("Account ID"). Each Account ID is personal in nature and may be used only by You or, if You are an organization, acting solely on behalf of the organization ("User"). You are solely responsible for all use of the Services by each User and for compliance by each User with the applicable terms contained herein. You will ensure the security and confidentiality of Your Account ID and will notify ClassWallet immediately if Your Account ID is lost, stolen or otherwise compromised. You acknowledge that You are fully responsible for all costs, fees, liabilities or damages incurred through use of Your Account ID (whether lawful or unlawful) and that any transactions completed through Your Account or under Your Account ID will be deemed to have been lawfully completed by You. In no event will ClassWallet be liable for the foregoing obligations or Your failure to fulfill such obligations. You will be solely responsible, at Your own expense, for acquiring, installing and maintaining all hardware, software and other equipment as may be necessary for You to connect to, access, and use the Services and the Site.

3. APPLICABLE POLICIES. In addition to these Terms, Your access to and use of the Site and Services is subject to ClassWallet's then-current policies relating to the Site and Services, including, without limitation, the Privacy Policy and Acceptable Use Policy available on the Site. You are responsible for compliance with these policies and all other ClassWallet policies applicable to the access and use of the Services posted to the Site or provided through Services.

4. SERVICES. The Services allows you to receive payment from third parties. If You use Your Account to receive payments, You acknowledge and agree that Your decision to use the Services and to receive payment is solely within Your own discretion. In connection with the Services, you may be asked to provide your consent or approval to certain information provided or actions taken by ClassWallet on Your behalf as part of the Services. ClassWallet may obtain any such consent or approval from You either in writing or through a message sent to Your Account through the Services or by email to any email address You have specified in Your Profile or in connection with your Account. You acknowledge that any consents or approvals provided through Your Account or from any such email address will be deemed to have been lawfully provided by You, without the need for further verification by ClassWallet.



5. **ADDITIONAL AGREEMENTS.** In addition to these Terms, you may be required to enter into certain additional agreements, either with us or with other Users, related to your access to and use of the Services, including any payments you receive through the Services (each, an “Additional Agreement”). You are solely responsible for having any Additional Agreement reviewed by your legal counsel, at your own expense, before entering into that Additional Agreement. Any Additional Agreement You enter into with any other User is a separate agreement in addition to these Terms. You agree to strictly comply with the terms and conditions of any Additional Agreement you enter into with any other User. ClassWallet is not and will not be a party to any Additional Agreement You enter into with any other User, and ClassWallet is not responsible, in whole or in part, for any such Additional Agreement or compliance with those agreements. You shall not include in any Additional Agreement You enter into with any other User any terms or conditions that conflict with or contravene any provision of these Terms or any Additional Agreement You enter into with ClassWallet, whether by imposing additional obligations upon ClassWallet, by reducing protections provided to ClassWallet, or otherwise. In the event of any conflict between these Terms and any Additional Agreement you enter into with any other User, these Terms shall control with respect to the subject matter hereof. Upon request from ClassWallet, You agree to provide ClassWallet with copies of any Additional Agreement between You and any other User, and any related documentation or records, as may be reasonably required by ClassWallet to verify your compliance with the terms of these Terms, any such Additional Agreement, or any applicable laws.

6. **THIRD-PARTY SERVICES.** The Services may include services provided by third-party service providers, including, without limitation, bank services (“Third Party Services”). In addition to these Terms, Your access to and use of any Third Party Services is also subject to any other agreement separate from these Terms that You may enter into (or be required to enter into) relating to those Third Party Services (each, a “Third Party Service Agreement”). The terms of any Third Party Service Agreement will apply to the applicable Third Party Services provided under that Third Party Service Agreement in addition to these Terms. Except as set forth herein, the terms of any Third Party Service Agreement will control in the event of a conflict between these Terms and that Third Party Service Agreement. All other Third Party Services will be subject to these Terms.

7. **RELATIONSHIP.** ClassWallet’s relationship with You shall be solely that of the provider of the Services through the Site. ClassWallet is not responsible, in whole or in part, for any act or omission of You or any other User. Nothing in these Terms shall create any other relationship between you and ClassWallet, including master or servant, employer or employee, franchisor or franchisee, co-employer, partner, joint venturer, or any other relationship whatsoever. ClassWallet shall not be a party to any Additional Agreement between you and any other User and ClassWallet shall have no responsibility for complying or ensuring compliance with any such Additional Agreement. Without limiting the foregoing, You acknowledge and agree that ClassWallet is not responsible for any payments required to be made to you by any other User, including for any goods or services provided by You or any other User, except as may be expressly agreed to in writing by ClassWallet.



8. TAXES. It is Your responsibility to determine what, if any, taxes apply to the payments you make or receive in connection with Your use of the Service, and it is your responsibility to collect, report and remit the correct tax to the appropriate tax authority. ClassWallet is not responsible for determining whether taxes apply to any transaction associated with Your use of the Services, or for collecting, reporting or remitting any taxes arising from any such transaction.

9. RELEASE OF CLASSWALLET. To the fullest extent permitted by law, You hereby release ClassWallet its affiliates and subsidiaries, and each of their respective directors, officers, managers, partners, employees, contractors, and agents, and all successors and assigns thereof, from any claims or damages of any kind or nature, known or unknown, suspected or unsuspected, disclosed or undisclosed, relating to any dispute relating to these Terms or any Additional Agreement, the Site, or any Services. You agree and understand and intend that this assumption of risk and release is binding upon You and Your heirs, executors, agents, administrators, and assigns. IF YOU ARE A CALIFORNIA RESIDENT, YOU HEREBY WAIVE CALIFORNIA CIVIL CODE SECTION 1542 IN CONNECTION WITH THE FOREGOING, WHICH STATES: "A GENERAL RELEASE DOES NOT EXTEND TO CLAIMS WHICH THE CREDITOR DOES NOT KNOW OR SUSPECT TO EXIST IN HIS OR HER FAVOR AT THE TIME OF EXECUTING THE RELEASE, WHICH IF KNOWN BY HIM OR HER MUST HAVE MATERIALLY AFFECTED HIS OR HER SETTLEMENT WITH THE DEBTOR."

10. SERVICE FEE. ClassWallet may charge a fee for the Services (a "Service Fee"). You acknowledge and agree that using the Services, ClassWallet may deduct the Service Fee from any amounts paid or payable to You through the Services. You also agree that if the payments You receive through the Services are not sufficient to cover the applicable Service Fee, ClassWallet may invoice You directly for the applicable Service Fee (or portion thereof) and You agree to pay such Service Fee as specified in these Terms. ClassWallet reserves the right to change any applicable Service Fees at any time. Any such change shall be effective immediately upon posting of the change to the Site. ClassWallet will deduct any applicable Service Fees from the amounts paid or payable to You through the Services. Alternatively, ClassWallet may also invoice you directly for any applicable Fees. You agree to pay all Fees when invoiced by ClassWallet. If You have specified credit card, or direct withdrawal or ACH payment from a bank account, as an applicable means of payment, You grant ClassWallet the right to charge that credit card or debit that bank account for any Fees under these Terms or otherwise incurred through any use of the Services through Your Account. Except as expressly set forth in these Terms, all Fees are non-refundable once paid, including upon any termination or suspension of these Terms or Your Account. If ClassWallet requires use of collection agencies, attorneys, or courts of law for collection on any Fees due under Your Account, You will be responsible for those expenses.

11. TERMINATION OR SUSPENSION. These Terms may be terminated by ClassWallet at any time, in ClassWallet's sole discretion: (1) upon any breach by You of these Terms; or (2) at any time, for any reason or no reason, upon notice to You. Without limiting ClassWallet's right to terminate these Terms, ClassWallet may also immediately and indefinitely suspend Your access to the Site or Services, with or without notice to You, upon any actual, threatened or suspected breach of these Terms or of applicable law or upon any other conduct deemed inappropriate or



detrimental to the Services by ClassWallet. For the avoidance of doubt, any suspension of Your access to or use of the Services permitted under these Terms, may include suspension of access to all or any part of Your Account. During any such suspension, Your right to access and use any portion of Your Account may be temporarily suspended, and You will not have access thereto while such suspension is in effect.

Upon termination or expiration of these Terms for any reason: (a) all rights and subscriptions granted to You under these Terms will terminate; (b) You will immediately cease all use of and access to the Site and Services; and (c) all Service Fees then owed by You will become immediately due and payable. The rights and obligations of the parties set forth in Sections 3 (Applicable Policies), 5 (Additional Agreements), 7 (Relationship), 8 (Taxes), 9 (Release of ClassWallet), 10 (Service Fee), 12 (Data Privacy), 14 (Disclaimer of Warranties), 15 (Limitation of Liability), 16 (Indemnification), 17 (Disputes), 19 (Governing Law), 21 (Additional Terms), and such other provisions that by their nature are intended to survive termination, shall survive the termination or expiration of these Terms.

12. DATA PRIVACY. In respect of Your use of the Site and Services and in relation to any personally identifiable and other data and information You provide to ClassWallet through the Site and Services, You expressly consent to the use and disclosure of that data and information as described in ClassWallet's then-current privacy policy displayed on the Site ("Privacy Policy").

13. WARRANTIES BY YOU. You hereby represent, warrant, and covenant for the benefit of ClassWallet that: (1) You have the legal right and authority to enter into these Terms, and, if You are accepting these Terms on behalf of a company or other entity, to bind the company or other entity to these Terms; (2) You have the legal right and authority to perform Your obligations under these Terms and to grant the rights and licenses described in these Terms and in any applicable Additional Agreement You enter into in connection with any of the Services; and (3) any data, information or content You provide to ClassWallet in connection with these Terms and Your access to the Site and use of the Services, is correct and current.

14. DISCLAIMER OF WARRANTIES. EXCEPT AS EXPRESSLY SET FORTH IN THIS SECTION 12, THE SITE AND SERVICES (AND ALL CLASSWALLET CONTENT PROVIDED THROUGH THE SITE AND SERVICES) ARE PROVIDED TO YOU STRICTLY "AS IS" AND "AS AVAILABLE" AND CLASSWALLET AND ITS PROVIDERS EXPRESSLY DISCLAIM ANY AND ALL WARRANTIES AND REPRESENTATIONS OF ANY KIND WITH REGARD TO ANY SUBJECT MATTER OF THESE TERMS, WHETHER EXPRESS, IMPLIED OR STATUTORY, INCLUDING, WITHOUT LIMITATION, ANY WARRANTIES OF FITNESS FOR A PARTICULAR PURPOSE, MERCHANTABILITY, TITLE OR NON-INFRINGEMENT. NO ORAL OR WRITTEN INFORMATION OR ADVICE GIVEN BY CLASSWALLET, ITS EMPLOYEES, OR AGENTS WILL INCREASE THE SCOPE OF, OR CREATE ANY NEW WARRANTIES IN ADDITION TO, THE WARRANTIES EXPRESSLY SET FORTH IN THIS SECTION 14.

15. LIMITATION ON LIABILITY. IN NO EVENT WILL CLASSWALLET BE LIABLE FOR ANY INDIRECT, INCIDENTAL, SPECIAL, EXEMPLARY OR CONSEQUENTIAL DAMAGES, HOWEVER CAUSED, UNDER ANY THEORY OF LIABILITY, WHETHER IN CONTRACT, STRICT LIABILITY OR TORT (INCLUDING NEGLIGENCE OR OTHERWISE), ARISING IN ANY WAY IN CONNECTION WITH OR OUT OF THE USE OF THE SITE, SERVICES (OR ANY CLASSWALLET CONTENT PROVIDED THROUGH THE SITE OR



SERVICES), EVEN IF CLASSWALLET HAS BEEN ADVISED OF THE POSSIBILITY OF SUCH DAMAGES, INCLUDING, WITHOUT LIMITATION, ANY LOSS OF DATA, OPPORTUNITY, REVENUES OR PROFITS, BUSINESS INTERRUPTION, OR PROCUREMENT OF SUBSTITUTE GOODS OR SERVICES. CLASSWALLET'S TOTAL CUMULATIVE LIABILITY IN CONNECTION WITH THIS AGREEMENT AND ALL SERVICES PROVIDED UNDER THIS AGREEMENT, WHETHER IN CONTRACT OR TORT OR OTHERWISE, WILL NOT EXCEED THE SERVICE CHARGES PAID TO CLASSWALLET HEREUNDER IN THE 1 MONTH PRECEDING ANY SUCH INITIAL OCCURRENCE OF LIABILITY (OR, IF NO SUCH SERVICE CHARGES HAVE BEEN PAID, \$10). YOU AGREE THAT THE SERVICE CHARGES REFLECT THE ALLOCATION OF RISK SET FORTH IN THESE TERMS AND ACKNOWLEDGE THAT CLASSWALLET WOULD NOT ENTER INTO THESE TERMS WITHOUT THESE LIMITATIONS ON ITS LIABILITY. IN JURISDICTIONS WHERE LIMITATION OF LIABILITY FOR CONSEQUENTIAL OR INCIDENTAL DAMAGES IS NOT PERMITTED, CLASSWALLET'S LIABILITY IS LIMITED TO THE MAXIMUM EXTENT PERMITTED BY LAW.

16. INDEMNIFICATION. You hereby agree to indemnify, defend, and hold harmless ClassWallet and its officers, directors, shareholders, affiliates, employees, agents, contractors, assigns, licensees, and successors in interest ("Indemnified Parties") from any and all claims, losses, liabilities, damages, fees, expenses and costs (including attorneys' fees, court costs, damage awards, and settlement amounts) that result from or arise in any manner out of: (1) Your access to or use of the Site or Services; and (2) Your breach of these Terms. ClassWallet will provide You with notice of any such claim or allegation, and ClassWallet will have the right to participate in the defense of any such claim at its expense.

17. DISPUTES. Except as otherwise provided below, the parties will attempt to resolve all disputes, controversies, or claims arising under, out of, or relating to these Terms, including the formation, validity, binding effect, interpretation, performance, breach or termination, of these Terms and the arbitrability of the issues submitted to arbitration hereunder and non-contractual claims relating to these Terms (each, a "Dispute"), in accordance with the procedures set forth in this Section 15. If any Dispute cannot be resolved through negotiations between the parties within 5 days of notice from one party to the other of the Dispute, such Dispute will be finally settled through binding arbitration under the arbitration of the International Chamber of Commerce ("ICC") then in effect (the "Rules"). Either party may commence the arbitration by delivering a request for arbitration as specified in the Rules. The arbitration will be conducted before a sole neutral arbitrator selected by agreement of the parties. If the parties cannot agree on the appointment of a single arbitrator within 30 days (the "Initial Period") after either party to this Agreement delivers a request for arbitration, a neutral arbitrator will be selected as provided in the Rules. The arbitration will be conducted exclusively in the English language at a site specified by ClassWallet. The award of the arbitrator will be the exclusive remedy of the parties for all claims, counterclaims, issues or accountings presented or plead to the arbitrator. The award of the arbitrators will require payment of the costs, fees and expenses incurred by the prevailing party in any such arbitration by the non-prevailing party. Judgment upon the award may be entered in any court or governmental body having jurisdiction thereof. Any additional costs, fees or expenses incurred in enforcing the award may be charged against the party that resists its enforcement.



18. NOTICES

TO YOU

You agree that ClassWallet may provide notice to you by posting it on our website (including but not limited to our Acceptable Use Policy, and Privacy Policy documents), or if we have your email address or street address, by emailing it to the email address listed in your account or mailing it to the street address listed in your account. Such notice shall be considered to be received by you within 24 hours of the time it is posted to our website or emailed to you unless we receive notice that the email was not delivered. If the notice is sent by mail, we will consider it to have been received by you three business days after it is sent.

TO CLASSWALLET

Notices to ClassWallet must be sent by post mail to:

ClassWallet
6100 Hollywood Blvd
Suite 108
Hollywood, FL 33024

19. GOVERNING LAW. The interpretation of the rights and obligations of the parties under these Terms, including, to the extent applicable, any negotiations, arbitrations or other proceedings hereunder, will be governed in all respects exclusively by the laws of the State of Florida, U.S.A. Any legal action or proceeding arising under, related to or connected with these Terms must be brought exclusively in the federal (if they have jurisdiction) or state courts located in Miami-Dade County and the Southern District of Florida and the parties irrevocably consent to the personal jurisdiction and venue there, and waive any objection to that location being an inconvenient forum.

20. MODIFICATIONS. ClassWallet reserves the right, in its sole discretion, to amend these Terms at any time, and from time to time, by posting amended versions through the Site. ClassWallet will give notice of any change to these Terms by making posting those changes on the Site. Use of the Services or Site after the posting of amended Terms constitutes Your acceptance of, and agreement to be bound by, the amendments and all changes contained therein. ClassWallet also reserves the right to add, remove, or change Services or Site at any time, for any reason. As a courtesy to You and other users, we will normally provide advance notice of any material changes to the Services or Site, but such advance notice is not required.

21. ADDITIONAL TERMS. These Terms, including the Terms of Use, which are incorporate herein by reference, form the complete and exclusive understanding and agreement between the parties, and supersedes any oral or written proposal, agreement or other communication between the parties, with respect to Your access to and use of the Site and Services, and the subject matter hereof. There are no third-party beneficiaries under these Terms and only the parties hereto will have the right to enforce these Terms against one another. If any provision of these Terms is held to be unenforceable under applicable law, that provision will be removed to the extent necessary to comply with the law, replaced by a provision that most closely



approximates the original intent and economic effect of the original to the extent consistent with the law, and the remaining provisions will remain in full force. Neither these Terms nor any rights or obligations of You hereunder may be assigned or transferred by You (in whole or in part and including by sale, merger, consolidation, or other operation of law) without the prior written approval of ClassWallet. Any assignment in violation of the foregoing will be null and void. ClassWallet may assign these Terms to any party that assumes ClassWallet's obligations hereunder. The parties hereto are independent parties, not agents, employees or employers of the other or joint venturers, and neither acquires hereunder any right or ability to bind or enter into any obligation on behalf of the other.

APPENDIX C



**Arizona Department of Education
Empowerment Scholarship Account (ESA)
Parent Advisory Council
Friday, March 19th, 2021
9:00 am to 12:00 pm**

Meeting Minutes

Council Members	Attendance
Kathy Boltz – Council Chair	Present
Tanya Brodd	Present
Elianita De Paula	Absent
Glendaliz Felix-Wooddisse	Present
Allison Gentala	Present
Chauncey Hallford	Present
Gretchen Jacobs	Absent
Vanessa Long	Absent
Angella Mundle	Present
Kayla Svedin	Present
Tracy Tanner	Absent

NOTE: Order of agenda items may be subject to adjustment, as needed, by Council Facilitator.

Item #	Topic	Speaker:	Discussion
I	Welcome <ul style="list-style-type: none">Opening of Meeting	Kate Wright – Chief of Staff	Started at 9:06 am Webinar started Welcome from Kate Wright Introductions The council members and ADE staff briefly introduced themselves and their role May have additional council parents join later in the meeting

			<p>On the webinar side, the Department of Treasury is included to listen to discussion ClassWallet representatives have also joined Other ESA parents have logged in to listen and some have submitted written comments in advance or have requested to speak</p> <p>Meeting Format Formatted as a webinar because the group is meeting to discuss specific issues related to the program but wanted to allow other parents to be aware of these discussions. Panelists can speak to the whole group and can chat to each other.</p> <p>Appreciate everyone's patience and grace with this format</p> <p>We will attempt to keep our cameras on, but with technology restrictions, children in the home, etc. it may not occur but when speaking please try to have your camera on.</p> <p>Scheduled for 3 hours but it is possible we may not go as long as scheduled.</p> <p>Purpose of PAC – Members selected from over 100 applications, many have more than 1 child in program, different parts of the state, provide ADE a broad scope of feedback.</p> <p>Purpose of actual meeting is to solicit feedback on specific challenges and the agenda is developed with the chair and the slideshow was developed collaboratively.</p> <p>We want to keep the discussion high level (case studies) trends and patterns that impact the program but please do not share your students' names or specific details in your comments.</p> <p>Want to keep conversations productive, ADE is here to listen, and we want these meetings to drive action. Everyone's voice is heard, and we should keep things at a professional level.</p> <p>Brief agenda overview</p>
II	Business <ul style="list-style-type: none"> ClassWallet Transition <ol style="list-style-type: none"> Parent Concerns and Requests 	Mike Mannelly – Associate Superintendent, ADE	<p>Goal – Limit disruption to the education of students by providing flexible purchasing options</p> <p>Objective – Finetune the CW system and implement the debit card feature in ClassWallet by July 1, 2021</p>

2. Debit Card Implementation
3. **Feedback Requested:**
Review the components of the implementation plan and provide feedback regarding additional information/resources that would support transition and implementation of the debit card feature.

Request of PAC – Review the components of the implementation plan and provide feedback regarding additional information and resources that would support transition and implementation of the debit card feature

Turnkey Debit Card Feature

1. Prepaid Debit Card – Sunshine Bank Mastercard
2. ESA staff identify accounts for debit card distribution based on parent request; who will be able to request one of these debit cards? If you have an account, you can request a debit card as soon as we have that option.
3. Merchant category code (MCC) restrictions will be enforced – MCC can transition right over to the Mastercard and will be the same as it was previously
4. Prepaid debit card transactions appear in the CW account portal – benefit is that it will show transactions in the CW portal; we'll discuss how that process works
5. Account holder can upload receipts and invoices electronically with the mobile app or computer; there will be training from CW

Implementation Plan Target Dates

1. April 1 – submit updated 21-22 Parent Handbook to reflect new prepaid debit card policies and procedures
2. May 15 – Open requests for debit cards; in ESA portal for parents to request a card, once a parent opts in, it should be a very automated process; takes about 10 business days to get those cards initially sent out to account holders and once received they will be ready to use in line with the handbook requirements; there has been constant communication with CW in recent months to work to make this option work
3. June 1 – Update CW training
4. June 15 – CW to implement expense tracking features to automate auditing for prepaid debit card transactions; shouldn't be a disruption from an account holder perspective, card will follow virtually the same process as before but the reporting will be done in the CW portal. Goal is to have these cards up and running before July date
5. July 1 – prepaid debit cards activated

Guiding Questions for Policies and Procedures

With the turnkey card, there was a need to make sure that it worked with the ADE process and is sustainable over time. Because we have been neck deep in policies and procedures and the handbook. We decided to work backwards because an FAQ usually comes last, but we decided to start with the FAQ and the questions families would need

to know. Some questions will be answered by what is possible from the vendor, some by what is possible under the current contract, some by policies, and some by discussions with parents and families

Process

1. What is ClassWallet's role in the debit card purchasing process?
2. What is the ESA team's role in the debit card purchasing process? ESA is still manning the audit and expense review, so we needed to make sure that the portal with CW made it able to do so

Request a Debit Card

1. How do account holder's request a card?
2. What is the process for review and approval of the request?
3. What are the timelines required for issue the card once it has been approved?
4. Who issues the card?

Spending

1. What are the card restrictions (merchant codes, vendors, providers)?
2. Are there minimum spending requirements to get a debit card (i.e. I only pay tuition can I get a debit card)?
3. Can I use the card to make purchases at vendors who are also in the marketplace?
4. If I have a debit card, can I also purchase items through the marketplace?
5. Are there purchase limits on the debit card?
6. Are quarterly expense reports required? How do I know if a quarterly expense report is due?
7. How do I upload receipts or invoices?
8. How often do I have to upload receipts or invoices?
9. What happens if a purchase or transaction is denied?
10. How do I return funds to the Department if a purchase is denied?

Some of these questions have answers, some are still being developed. We anticipate addressing these questions in the handbook, training, and FAQs. Want feedback on what questions need to be answered

PAC: Debit Card Parent Concerns/Requests

- What happens with providers/small business who prefer to be paid by card but are now on CW?
- How will approvals for purchases work? Would like more details as people decide if they want to sign up for a card

- Keep MCC restrictions but allow card purchases from vendors who are on CW, such as
 1. Online retailers: amazon purchases through CW would work better through a card; same with other retailers
 2. Vendors: Many AZ small business prefer card payments instead of the CW system
- No per purchase dollar limit on the card, allow access to all available ESA funds
 1. Expenses are in the thousands of dollars, such as college tuition, evaluations like an educational neuropsychologist, or purchasing a full-year curriculum at a homeschool conference

Discussion Summary

A council member asked if there will be a delay for families moving from the BOA card to the new CW card on July 1? Will there still be a delay between quarters waiting for funds? ADE staff responded that currently it appears there wouldn't be a delay transitioning between cards.

A council member asked if there will be a difference in funding timelines for families using a CW card. ADE staff responded that the current understanding is there should not be a difference as it should be a seamless platform.

A council member asked if families will be able to use both the CW portal and the CW debit card. ADE staff shared that currently a card would be able to be used for any vendors not in the marketplace or anything in the marketplace could be purchased. The marketplace should be 100% accessible if you have the card.

A council member asked about the timelines for denial of purchases made using the CW card and ADE staff responded that for disallowed expenses, the process and timelines should be consistent with those for the current card though there could be hiccups. Additionally, this is a policy question rather than a functionality issue and ESA staff should have the same access as with BOA so they can ensure it is consistent with policy.

A council member asked about if card users will still need to file expense reports and if so what the frequency would be. ADE staff responded that how that works is still being determined but that there should not be a need for expense reports since it should all be visible in the portal. The new reporting should be more as-you-go and eliminate the burden of expense reports.

A council member asked if parents would pick a category in the CW app when they upload a receipt. ADE staff responded that that will be included on training provided by CW.

A council member expressed concern that having to upload a receipt as you go for every purchase may not be convenient for all parents and suggested having a system where receipts could be uploaded as you go but must be uploaded by the end of the quarter.

Kate – thanks and to clarify, the questions we can't directly answer are being noted and are still in the process of being worked out

A council member expressed concern about the card only being able to be used for vendors not in the marketplace as it could cause families to miss out on sales due to delays with concierge. ADE staff acknowledged that concern.

A council member shared that the desire is that families can purchase from vendors flexibly either in CW or with the card.

A council member asked if there will be fees associated with the transactions on the card. ADE staff responded that there is not currently an answer. The more restrictive turnkey card does not have fees, but ADE is in discussions with the Treasurer's office about what is allowable under the current contract. If it is allowable under current ESA statutes, it is possible there could be a transaction fee because CW is funded through the fees on purchases in the marketplace and pay vendor and the debit card would not generate the revenue to CW that supports the contract. A council member responded that they want the card to be tenable for everyone and noted that the BOA card did have a fee structure. A council member noted that many cards have a 1% cash back feature and CW could possibly look into that.

A council member asked if reimbursement would still be an option once the card is rolled out. ADE staff responded that with the development of the card, the concierge and reimbursement options were set to be retired and that we'll have to troubleshoot purchases that can't be made with the card or in the marketplace.

A council member asked if there could be a call-in option that would allow a card to be temporarily unblocked for a particular purchase. ADE staff responded that they would need to explore that.

A council member shared that the availability of the card should tremendously reduce the use of concierge and reimbursement but that those options should still be made available. Additionally, they noted that having a list of approved MCC codes would be helpful so parents could share that with vendors that are willing to change their code.

More general CW concerns

PAC: CW Parent Requests

1. CW should respond on a clear and public timeline to requests from parents and vendors
2. CW should provide account statements
 - a. Be financially transparent on exactly how much funding a student has at a given time and what it has been spent on.
3. CW should issue complete refunds promptly
4. CW should honor coupons and sales
5. CW should update the Direct Pay Vendor list at least weekly
6. CW should organize the Direct Pay Vendor list by services offered and by geography (i.e. by zip code)
7. CW should allow supporting documents to be uploaded with an order so approvals from ADE are connected with the purchase on CW
8. CW should allow an order to have a rejected item removed from the cart while still allowing approved items in the card to be purchased
 - a. Provide an option to cancel the whole order or cancel only the approved item

Discussion Summary

A council member noted that there is no way for a parent to respond if one of their items is rejected and they just receive a generic response instead of a specific response noting the problem with the item.

A council member shared that having a way to upload documents (i.e. approvals) to an order would help ensure a smoother process.

A council member shared that parents would like CW employees to identify themselves by name in correspondence.

ADE staff noted that the transition period between BOA and CW discussed earlier, could have a 10-business day period to close one account and move to the new one.

A council member noted that the delay caused by that transition time period could be inconvenient for some parents that prefer to pay at the beginning of the month.

Kate – I appreciate the clarification and I think the biggest thing is making parents aware. Our commitment is to be as transparent as we can so parents can make plans as needed. That 10-day period is consistent with people getting a CW debit card and not transitioning between the two.

Mike - correct

ADE-CW Processes

- Consistent timelines
- Consistent approval process – some items are on the approval list but are still getting rejected and responses are inconsistent depending on which ESA staff you talk to
- Avoid redundant steps, such as requesting approval, getting denied, re-requesting and then obtaining approval

Discussion Summary

A council member noted that the CW approval process has worked pretty well for their family but sometimes items are requested at the same time for two children and one is approved and the other is not. This has caused a reluctance to stray from approved items because after doing lots of research on items, they get denied.

A council member shared that approval/disapproval dissonance is one of the biggest issues they are aware of because it happens a lot instead of every once in a while.

A council member shared that they had several examples of inconsistency in approvals and getting conflicting responses from ESA staff. They also expressed concern about privacy for the documentation that is shared to be able to purchase tech devices.

Kate – we have noted the inconsistent approvals/denials and the timeliness. Those were obviously concerns raised by more than one parent and we see that there is an issue there.

A council member noted that have a sorted and searchable list of approved technologies on the website could help with this.

Whitney – we got that up as quickly as we could to be in compliance with rules and we know that when you open it, it is small and not sortable so IT is working with the Department of Administration who runs the website to try and create a searchable database on the website that would be updated with regularity so you could search by category, it wouldn't be an excel or PDF but would be on the website.

Assistive Technology (AT)

- MCC codes need to allow these purchases: Apple store, Best Buy, etc. Perhaps this can be only for the students who are special education

Inefficient Process

- Files that support authorizing AT for qualified students need to be able to be submitted with the order
- Currently, for order with AT, you can't submit files or documents WITH your order for approval. Everything gets rejected and THEN you can submit your files, which is not efficient.

Clarification on sufficient documentation for associated goods (AT)

- ADE staff need to provide specific guidance on what documentation is sufficient for the approval of AT associated goods, i.e. required content in letter from certified service provider – a child may have gotten an IEP when they were 5 but now need a laptop and a letter from an occupational therapist or other profession should be sufficient

Discussion Summary

A council member expressed concerns about HIPPA information being shared in the documentation being requested to approve Assistive Technology. They also shared that they don't know how to argue with ESA staff that disapprove an item if they do not know their qualifications. The experience regarding Assistive Technology differs greatly from one parent to another.

A council member shared that even low-tech items like Thera putty are being denied which contradicts with their experience working in Special Education for their job.

A council member shared that assistive technology is any item that allows a child to effectively access the curriculum and that it is important to separate

			<p>from the fine print and place the focus on the people making approvals to know that as long as items are approved by a professional, they should be accepted. The IEP is what a public school district uses to provide legal checks and balances and to ask parents to provide that negates part of it. The sharing of an IEP or MET also brings up a privacy component. An educator would not just send an IEP to anyone and for the program an IEP and MET is not required. Documentation from qualified professions should be approved and the letters from those professionals should be honored so students do not miss out.</p> <p>A council member reiterated that they felt it is inappropriate for random ADE staff to request an IEP or other evaluation to determine whether an assistive technology item is allowable and expressed that it is not the department's job to determine the necessity of the item but rather to ensure there is appropriate documentation from a relevant professional regarding the item. They also noted consistency as a big issue and expressed that staff should receive proper training.</p> <p>A council member shared that the MET reports for their children are old and that students with special needs have different growth patterns than other kids and their needs change as they get older.</p> <p>A council member asked ADE to think about the burden families have beyond the ESA ones and noted that they are above and beyond that for families with students developing typically. They noted that the guidelines on policy state that there should be sufficient documentation from a professional and questioned why there is variation on that.</p> <p>A council member shared that for student's who have an approved iPad purchase, there is no way to purchase assistive technology apps for it and noted that CW sending gift cards for those purchases is not appropriate.</p>
III	Information Only <ul style="list-style-type: none"> Revisions to the Parent Handbook for SY2021-2022 Next Steps <ol style="list-style-type: none"> Informational Update 	Karla Escobar – Deputy Associate Superintendent, ADE	<p>Additional ADE Introductions</p> <ul style="list-style-type: none"> Karla Escobar – Deputy Associate Superintendent for ESA Karla Bravo – Compliance Manager for ESA <p>Goal – Revise the Parent handbook for school year 2021-2022 to incorporate recommendations made for parents and stakeholders and reflect changes to administration of the program as a result of new processes, rules and statutes</p> <p>Objective – Publish the revised Parent Handbook by May 1, 2021</p>

Request of the Parent Advisory Council: No request at this time

Kate – before I change the slide, Whitney will present on the Parent Handbook at the SBE meeting on Monday

A council member asked where the updated handbook can be found.

Whitney – is it posted online with the SBE meeting materials?

Alicia – yes it is

Whitney – we can get the link and send it out to all the attendees and panelists, and it will be part of the packet for SBE for Monday

Kate will put link on slide

Handbook Revisions Update

Process Overview

- January 13, 2021 – redlined handbook sent to ESA Parent Advisory Council members for review and discussion at the January 27 meeting
- January 18, 2021 – Redlined handbook and comment form posted to ESA website
- January 20 – the January ESA newsletter emailed to all active account holders included notice that the window for feedback on the handbook had opened with a link to the form to submit feedback
- January 27 – ESA Parent Advisory Council meeting: comments related to the handbook were collected through written and spoken feedback either submitted for the meeting through the request to speak for or made during the meeting by members and attendees
- February 3 – The handbook feedback form was closed. A total of 19 written comments were submitted through the form
- February 3- February 26 – Review of all parent feedback and documentation of changes by ESA program leadership in collaboration with the Department's Assistant Attorney General
- March 1 – Revised handbook submitted to State Board of Education with a summary of changes

			<p>Next Steps</p> <ul style="list-style-type: none"> • March 22, 2021 – State Board of Education meeting • March 22, 2021- April 1, 2021 – ADE and SBE finalize changes and incorporate relevant debit card information • April 26, 2021 – State Board of Education Meeting • May 1 2021- Final version posted with changes clearly identified; would like to get it emailed as well <p>Whitney – for those who won’t be watching on Monday, we’ll give a little bit more of a breakdown. While only 19 comments were submitted through the form, the comments at the last meeting were quite robust and was all documented and with the help of the Assistant Attorney General’s office, there were over 300 that were categorized, looked at, and addressed. The 19 comments point doesn’t give the whole scope and there was lots of feedback received through the PAC and we appreciate all that feedback</p> <p>Kate – at this point, the chat, Alicia shared the link in the chat, and it should have gone to all panelists and attendees and we’ll include it in the PowerPoint and share it.</p>
III	<p>External Stakeholder Comments</p> <ul style="list-style-type: none"> • Received written comments • Speakes 	<p>Kathy Boltz – Chair of ESA PAC</p>	<p>We received written comments and they are included in today’s slide. We wanted to make sure parents that are not part of the PAC know that they have been heard.</p> <p>Written comments</p> <ul style="list-style-type: none"> • Can concierge be used for services such as tutors? There are quite a few families on ESA that are not in a financial position to pay up front then get reimbursed for services, products, etc. • Will the proposed CW cards only work with the educational MCC? • Will the reimbursement option <p>Due to the private nature of the situations and circumstances that were shared as part of this public comment period, this section has been summarized below.</p> <ul style="list-style-type: none"> • Appreciate PAC • Concern about student privacy regarding IEPs and MET reports • Concern about parent privacy (banking info, social security) signing up for CW card • Would like explanation regarding transition from BOA to CW

- Concern about timeline for approval; currently take at least two weeks and causing issues with purchases
- Contact points and escalation pathway
- Would be interested in the debit card option
- Vendors unable to sign up for CW
- Love the program
- Access to facilities like swimming is important
- Private online school is unlikely to sign up for CW and unsure if would be able to pay for that with the CW card; if school must be in CW, would like a paid staff member to work on that instead of parent
- Reimbursement is not a real option
- Want to ensure vocational options are available to students
- Consumables are not currently approved expenses but should be for culinary courses
- Assistive Technology apps need to be able to be purchased; would like ESA staff to take initiative to contact families about how to make this possible
- Reimbursement and concierge should not be completely retired because there are still some situations where they are needed
- CW should provide statements and receipts for every purchase
- CW is slow to replace funds in student accounts and statements are not being updated

ADE Response:

- Regarding transition from BOA to CW, decision was made in 2018 with ADE and Treasurer's office to move to new financial platform to expedite process, limit opportunities for mispending, and ensure sustainability of program. BOA cards now no longer offered to the state, so regardless of 2018 decision it is no longer an option.
- ADE staff is noting action items as a result of feedback
- Trying to look for allowability for tuition payments, will do what we can to get online school into marketplace.
- Currently would not be an option to pay tuition using CW card under to contract from the treasurer to CW; ADE will speak to CW and Treasurer's office

			<p>Action items identified during meeting</p> <ul style="list-style-type: none"> • Consistency • Timeliness • Communication • Assistive technology • ClassWallet concerns • Debit Card Questions • Reimbursement Concierge <p>Discussion Summary</p> <p>A council member shared that the tuition part of the CW card is an urgent concern. ADE staff noted that it is a top question to get resolved.</p> <p>A council member shared that there are questions about reimbursement when an item is purchased, and it is determined that the parent must reimburse the state for that item and where the money goes. Another council member echoed a similar issue and that the money went to the general account instead of the student's account. A council member shared that misspending does not go back into the student's account. ADE staff noted that if they receive specifics, they can look into the circumstance but that misspending goes back to the general fund not personal accounts which is consistent with statute and rules. State Board staff shared that Senate Bill 1452 clarifies how checks for misspending would get credited to a student's account balance, not currently law.</p>
IV	<p>Good of the Order</p> <ul style="list-style-type: none"> • Future meeting dates • Items for further discussion • Announcements 	<p>Kate Wright – Chief of Staff ADE</p>	<p>ESA Town Hall Focused on CW and Debit Cards – April 19th 1:00-3:00pm 4:00-6:00pm</p> <p>ESA PAC Meeting Target Date: May 2021 ADE will send poll</p> <p>Potential Agenda Items:</p>

		Communications Plan, CW transition and debit cards
V	Adjourn & Close Meeting	<p>Kate – thank you for your time and contribution to moving the program forward and we are working on behalf of Arizona to support you and your children</p> <p>Discussion Summary</p> <p>A council member asked if other members have any issues or ideas to address in future meetings.</p> <p>A council member asked if there was an update on the marketing plan. ADE staff shared that it has components including brochures and social media and is in the final approval process with videos and advertising pieces. 95% ready just making sure everything has been vetted and it should launch in March. Families should start seeing it on social media in the next couple of weeks.</p> <p>A council member shared that timelines for vendors in CW is an issue to address.</p> <p>A council member asked that a chain of command be shared to direct escalation of issues. ADE staff and State Board noted that this was shared with SBE in December or January and would be shared back</p> <p>Kate – I think we have said a lot and a lot has been shared and we appreciate everyone's time and know you are managing a lot at home and appreciate the partnership with the agency and the collaboration and ability to work as a team to make the improvements that need to be shared. We'll share the PowerPoint from today and we will share the doodle poll and the invite for the town hall. Have a wonderful weekend.</p>

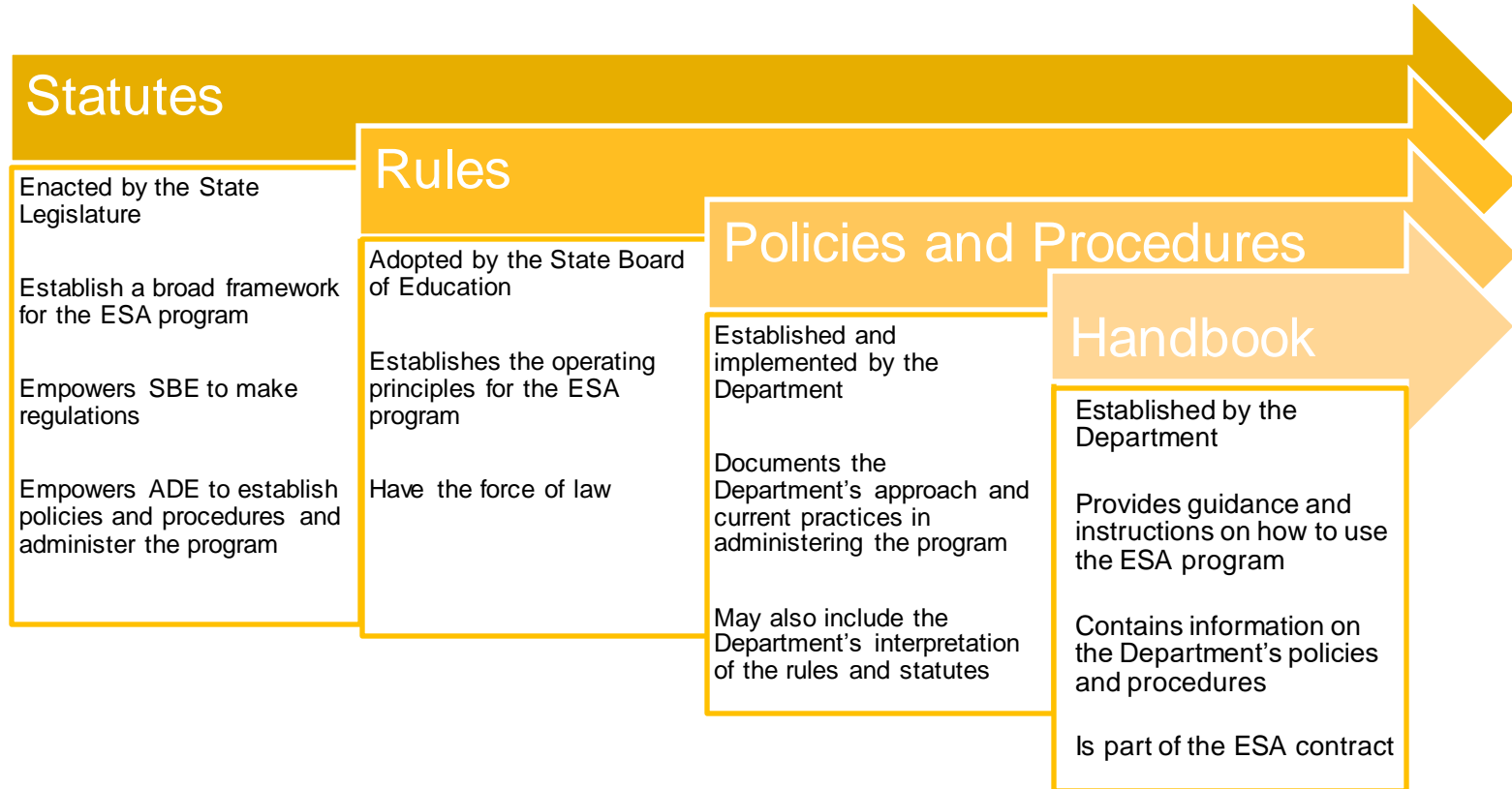
APPENDIX D



Empowerment Scholarship Account (ESA) Parent Handbook SY 2021-2022

March 22, 2021

Background



Background

Goal: Revise the Parent Handbook for School Year 2021-2022 to incorporate recommendations made by parents and stakeholders and reflect changes to administration of the program as a result of new processes, rules and statutes.

Objective: Publish the revised Parent Handbook by May 1, 2021.

Version History

Current

SY 2020-2021

available at
azed.gov/esa/parenthandbook

Redlined

SY 2021-2022

posted Jan 4 at
azed.gov/esa

*Revised

SY 2021-2022

Submitted to SBE Mar 1 with
summary of changes

Final

SY 2021-2022

To be submitted to SBE Mar
29 with summary of changes
and posted at azed.gov/esa
by May 1

*Revised version submitted to the Board incorporates
response to feedback submitted by ESA stakeholders based
on the redlined version

Process Timeline

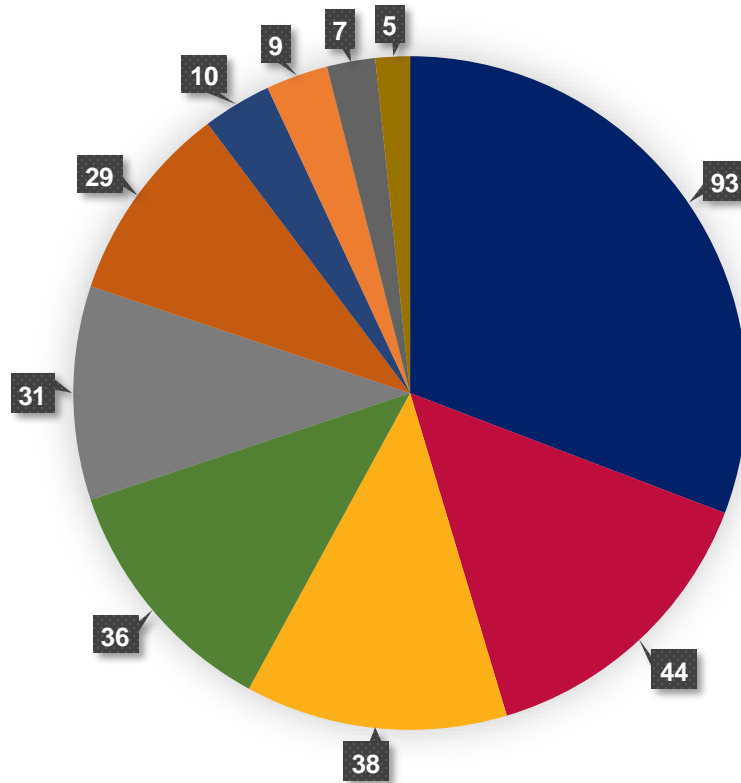
- January 13, 2021: Redlined Handbook sent to ESA Parent Advisory Council members for review and discussion at the January 27 meeting.
- January 18, 2021: Redlined Handbook and comment form posted to the ESA website.
- January 20, 2021: The January ESA Newsletter emailed to all active account holders included notice that the window for feedback on the Handbook had opened with a link to the form to submit feedback.
- January 27, 2021 ESA Parent Advisory Council meeting: Comments related to the Handbook were collected through written and spoken feedback either submitted for the meeting through the request to speak form or made during the meeting by members and attendees.
- February 3, 2021: The Handbook feedback form was closed. A total of 19 written comments were submitted through the form.
- February 3, 2021 – February 26: Review of all parent feedback and documentation of changes by ESA Program leadership in collaboration with the Department's Assistant Attorney General.
- March 1, 2021: Revised Handbook submitted to State Board of Education with a summary of changes.



Process Overview

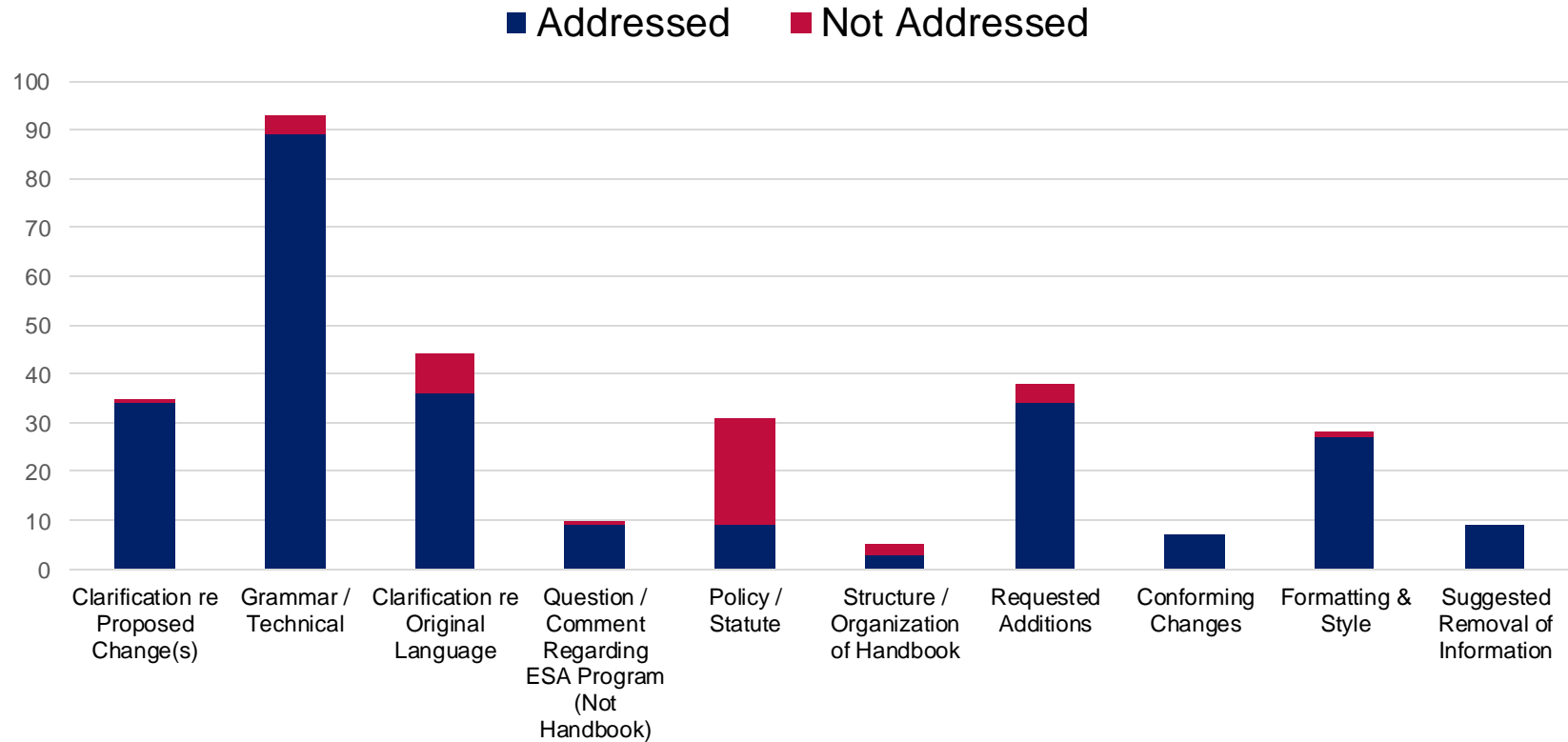
- All comments submitted through the online form and collected as part of the January 27 Parent Advisory Council were documented and analyzed by the Department's Assistant Attorney General and Program leadership
- Each comment was broken down into separate components based on subject
- This resulted in a total of 302 individual comments that were categorized by type of comment and related section of the Handbook

Comments by Type



- Grammar / Technical
- Clarification re Original Language
- Requested Additions
- Clarification re Proposed Change(s)
- Policy / Statute
- Formatting & Style
- Question / Comment Regarding ESA Program (Not Handbook)
- Suggested Removal of Information
- Conforming Changes
- Structure / Organization of Handbook

Response by Type



Summary of Substantive Changes

- Added a definition of dual enrollment
- Added guidance regarding approved credentials for physical education tutors/teachers
- Added specific guidance for ClassWallet addressing, among other things, how to use the Concierge Service, requirements for reimbursement, average timeframes for payment to providers, who is responsible for paying the processing fees
- Addressed Account Holders' frequently asked questions and common challenges regarding the Help Desk platform
- Provided clarification regarding Handbook updates, including the limitations provided in A.A.C. R7-2-1503(a) and direction on how Account Holders will be notified of any changes



Summary of Substantive Changes

- Clarified that approved services may be provided virtually
- Clarified that the Department cannot accept private evaluations or private school evaluations for the purpose of updating a child's disability category and/or funding
- Clarified what requirements must be met before Account Holders are permitted to use ESA monies for independent evaluations
- Removed all guidance relating to Bank of America because all ESAs will be converted to ClassWallet before the Handbook's effective date
- Clarified what conditions must be met before ESA monies may be used for annual subscriptions or lifetime access
- Clarified requirements for re-evaluation of ESA Students who were awarded an ESA under the disability category of Preschool Severe Delay, and who will turn 5 years old on or before September 1



Summary of Non-Substantive Changes

- Incorporation of >120 suggested grammatical, technical, conforming, and stylistic changes
- Revised sections of the Handbook to use layman's terminology
- Adjusted tone throughout to provide positive instruction (i.e. how to use ESA monies, rather than how not to use them)
- Clarified that Handbook examples (e.g. approved therapies) are not exhaustive lists, and Account Holders may seek approval for services that are not included in the Handbook
- Reworded provisions of the Handbook to improve readability and avoid confusion
- Added links to relevant external sources
- Highlighted contact information for Account Holders' convenience, and provided guidance regarding which contacts should be used for different types of questions or concerns



Summary of Requests Not Incorporated

- Comments unrelated to the ESA Parent Handbook
- Comments advocating for a change in Department policy
- Comments advocating for a change in statute or rule

Next Steps

- March 22, 2021 – March 29, 2021: ADE to finalize formatting changes and incorporate relevant ClassWallet debit card information as available
- April 26, 2021: State Board of Education meeting
- May 1, 2021: Final version posted with changes clearly identified



Questions