



January 21, 2016

Deborah Spitz  
U.S. Department of Education  
400 Maryland Ave., SW  
Room 3E306  
Washington, DC 20202

Re: Request for Information ED-2015-OESE-0130  
Implementing Programs under Title I of the Elementary and Secondary Education

Dear Ms. Spitz,

The Coalition for Community Schools appreciates the opportunity to comment on the request for information regarding implementing programs under Title I of the Every Student Succeeds Act (ESSA) as published in the Federal Register on December 22, 2015. The Coalition is an alliance of over 200 national, state, and local partners dedicated to the mission to unite school, family and community for young people's success. We are a broad coalition of education, health, youth development, and civil rights organizations. And we represent more than 150 communities across the country implementing community schools at scale.

The new Every Student Succeeds Act contains key provisions that advance the principle that partnerships among school, family and community are essential for student success. It empowers state and district leaders to rethink strategies to support all students and to see their communities as vital resources in that effort. We offer here our comments on key areas relevant to our partners and community schools.

#### Inclusion and Consultation of "Community Partners"

**We urge the Department to include "community partners" as stakeholders to be consulted in the development of SEA and LEA plans-alongside educators and parents-through ESSA regulations.**

Under ESSA, states and districts must report a broader set of results beyond academics, including chronic absence, school discipline and school climate data. Experience tells us that schools must partner with their community to tackle these goals together. United Ways, community-based organizations, higher education institutions, local government and others are already addressing these results in various ways and the Department can affirm the importance of schools collaborating with these partners in its regulations. **Further, ESSA regulations should clarify that consultation with community partners is continuous, so that relationships can be deepened and impact increased over time.** We would also point out that the "community" is included as a stakeholder for Title I peer-review teams for state plans, school-wide program plans, Title I Part E for Flexibility for Equitable Per-Pupil Funding, and for Title II state and LEA applications for formula grants, so the inclusion of community members and partners should be consistent throughout the entire law.

Additionally, many community partners focus on and enrich parent and family engagement through their programming during and beyond the school day. As such, **ESSA regulations should include**

**community partners as stakeholders who can receive professional development on parent and family engagement strategies** in *Section 1010 Parent and Family Engagement*. This will ensure that community partners, like educators, have the opportunity to deepen their knowledge and skills to effectively engage parents and families and that their efforts are aligned with those of educators to increase impact.

#### Non-Academic Indicator(s)

We are very pleased that the law requires states to incorporate at least one non-academic indicator into their accountability system. This provision represents a significant recognition of the multiple factors that influence young people's success. To ensure these non-academic indicators are as meaningful as possible, **ESSA regulations should encourage SEAs to develop a comprehensive framework for results aligned with the long-term goals that ESSA requires they define**. Such a framework will help tie the academic and non-academic indicators together. This will ensure that the non-academic indicators are not just an additional data point that states will collect, but that they will serve as a powerful tool to drive how states meet their goals. For an example of a results framework, see the [Coalition's Rationale and Results Framework](#). **Further, ESSA regulations should encourage states to undertake an inclusive outreach strategy to educators, families, students and community partners to get input on the indicator(s)**. This outreach may include a notice in local print and online newspapers with an invitation and process to give input. Such a process is most likely to lead to indicators that meet three key criteria for strong indicators: 1) Communications Power: is explanatory for a broad and diverse audience; 2) Proxy Power: is of central importance and will drive actors to work together; 3) Data Power: based on data that is reliable and consistent.<sup>1</sup>

#### Conditions for Learning, Comprehensive Needs Assessment, and Resource Inequities

We commend Congress for various references to conditions for learning, comprehensive needs assessments, and resource inequities that collectively recognize the need to examine the adequate and equitable inputs needed to achieve the academic outcomes states will set under this new law. We make the following recommendations to strengthen these areas:

*Conditions for Learning:* We believe it is essential to create the conditions for learning in order to prepare students to become college- and career-ready. Moreover, when educators and policymakers think about conditions for learning, they think more comprehensively about what young people need to thrive. **ESSA regulations should encourage SEAs and LEAs to articulate what they define as "school conditions for student learning" before selecting strategies to improve them**. Articulating these conditions will help states and districts prioritize the action steps that will follow from the required review of needs assessments and resource inequities (see following recommendations). For an example of these conditions for learning, we encourage the Department to review the six conditions for learning we have articulated for years and in reports like [Making the Difference: Research and Practice in Community Schools](#). These conditions for learning are:

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<sup>1</sup> These criteria are described by Mark Friedman in *Trying Hard is Not Good Enough: How to Produce Measurable Improvements for Customers and Communities*.

- Condition #1: Early childhood development is fostered through high-quality, comprehensive programs that nurture learning and development
- Condition #2: The school has a core instructional program with qualified teachers, a challenging curriculum, and high standards and expectations for students
- Condition #3: Students are motivated and engaged in learning — both in school and in community settings, during and after school.
- Condition #4: The basic physical, mental and emotional health needs of young people and their families are recognized and addressed.
- Condition #5: There is mutual respect and effective collaboration among parents, families and school staff.
- Condition #6: Community engagement, together with school efforts, promote a school climate that is safe, supportive and respectful and that connects students to a broader learning community.

*Comprehensive Needs Assessment:* The Title I requirement for a comprehensive needs assessment for Targeted Support schools and Schoolwide Programs is a great development. There are numerous community partners ready and willing to step up to support the needs assessment and planning process embedded in various elements of ESSA. **ESSA regulations should encourage LEAs to involve community partners in the needs assessment.** That will set the stage for these partners to be deeply engaged in addressing particular needs. **ESSA regulations should also encourage LEAs to examine the assets in the community in addition to the needs.** Assets include human, institutional, and financial strengths schools can leverage.

*Resource Inequities:* We also support the requirement that SEAs identify resource inequities as part of their comprehensive support and improvement plans. **ESSA regulations should provide SEAs examples of resource inequities to examine and address, and we recommend the Department include the following core resources for learning in their examples:**

- 1) High-quality instructional teams, including licensed, credentialed, and profession-ready teachers, principals, school librarians, counselors, and education support personnel.
- 2) Rigorous academic standards and curricula that lead to college and career readiness by high school graduation, including the extent to which each local educational agency provides access to such standards and curricula in a manner that is accessible to all students, including students with disabilities and English learners.
- 3) Equitable and instructionally appropriate class sizes.
- 4) Up-to-date instructional materials, technology, and supplies, including textbooks, computers, mobile devices, and access to broadband.
- 5) Effective school library programs.

- 6) School facilities and technology, including physically and environmentally sound school buildings and well-equipped instructional spaces, including laboratories and libraries.
- 7) Specialized instructional support personnel teams, including school counselors, school social workers, school psychologists, school nurses, and other qualified professionals involved in providing assessment, diagnosis, counseling, educational, therapeutic, and other necessary services.
- 8) Effective programs for family and community engagement in education.

### Schoolwide Programs

The language describing requirements of school-wide program plans strongly reflects the community school strategy. From the requirements to conduct a comprehensive needs assessment of the entire school; to address the needs of all the children in the school, through counseling, mentoring, etc.-these are activities that community schools engage in deeply. The Department recognized this in 2009 in clarifying through [ARRA guidance](#) that Title I funds can be used to hire a coordinator for schoolwide programs to “to facilitate the delivery of health, nutrition, and social services to the school’s students in partnership with local service providers.” The same clarification should be made now, and **ESSA regulations should clarify that Title I schoolwide program funds may be used to designate a site resource coordinator at a school or LEA as an allowable use of funds.** Additionally, **ESSA regulations should clarify that non-profit providers who may deliver services for a schoolwide program can include United Ways, Boys and Girls Clubs, YMCA’s, and institutions of higher education.** These are all important providers and partners in successful community schools across the country and should be referenced as potential providers for schoolwide programs.

We thank you for this opportunity to comment and look forward to working with you as this law is being implemented. If you have any questions, please feel free to contact Mary Kingston Roche, Director of Public Policy at [rochem@iel.org](mailto:rochem@iel.org) or 202-822-8405 x 140. On behalf of our over 200 partners, thank you for your consideration.

Sincerely,



Martin J. Blank

Director

Coalition for Community Schools



Mary Kingston Roche

Director of Public Policy

Coalition for Community Schools

*These recommendations reflect the shared vision and principles of community schools among our partners and may not necessarily reflect the individual views of all of our partner organizations.*