

February 10, 2022

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U.S. Department of Education
400 Maryland Ave., SW
Washington, DC 20202

Public Comment on Proposed Priorities, requirement, definitions, and selection criteria-Full-Service Community Schools Program

Docket ID ED-2021-OESE-0152

The Coalition for Community Schools, hereinafter referred to as “The Coalition”, is pleased to submit this public comment on behalf of the organizations below that are partners of the Coalition.

The Coalition, now in its 25th year and housed at the Institute for Educational Leadership, is an alliance of national, state, and local partners spanning education, health, youth development, civil rights, and other sectors that come together to advocate for Community Schools as an effective strategy for school improvement. Collectively, the Coalition represents millions of youth and adults across the country who are either directly working with Community Schools or are members of organizations that advocate for Community Schools. The Coalition across its leaders from the local to national levels has decades of experience working with Community Schools along with expertise in starting, scaling, and sustaining Community Schools from the site to system to state to federal levels. It is with this experience and expertise that the Coalition offers our comments on the Department’s Proposed Priorities for the Full-Service Community Schools program.

General Comments

Alignment with the Full-Service Community Schools Expansion Act (S. 385/H.R. 1241): Dozens of national, state, and local community school leaders and experts worked with Congress to draft and introduce this legislation this Congress. This legislation reflects the current standards, evidence base, and decades of experience from the Community Schools field. We are pleased to see alignment with this legislation in many areas of the Proposed Priorities, and many of our recommended changes outlined below are to reflect this federal legislation.

The Importance of Deepening and Sustaining High-Quality Implementation, along with Scaling: Proposed priorities 1 through 3 invite applicants to identify new schools as sites to implement the Community Schools strategy. Equally important, however, is the work to deepen and sustain implementation of current Community Schools within the same district or system. The Department in its Background section states this: “Although scaling the approach is important, equally important is retaining high quality implementation and fidelity to the approach which includes the pillars of full-service Community Schools.” We offer specific recommendations across the proposed priorities to reflect this point.

The Importance of Strong Technical Assistance and Capacity-Building: High-quality implementation of Community Schools require high-quality technical assistance and capacity-building. The Coalition looks forward to working with the Department around our goal for the Department to create various levels of technical assistance support, led by a national steering committee of key community school stakeholders, to best support and coordinate technical assistance efforts for both grantees and prospective grantees to ensure that everyone has access to high-quality implementation support.

Prioritizing Need: With limited federal funding, it is important that these funds are directed to those qualified applicants that demonstrate the greatest need. We encourage the Department to be explicit in the final Priorities to state this priority and to add a selection criterion to this effect that we enumerate below.

Specific Comments

In the Background section, “expanded learning opportunities” to describe one of the four pillars of Community Schools should be amended to “expanded and enriched learning time and opportunities” to reflect elsewhere in the document and the language used in the Full-Service Community Schools Expansion Act and from research from the Learning Policy Institute.

Proposed Priorities

Proposed Priority 1—Capacity Building and Development Grants

The Coalition supports this proposed priority to enable places that want to create Community Schools to be able to compete for funding to start the work. The Coalition recommends striking the word “sustain” from the language “implement and sustain” in this proposed priority to reflect the nature of this grant as focused on capacity building and development.

The Coalition recommends that the Department clarify that the needs assessment would be done during, and not before, this grant period, and recommend the following revised language to reflect this: “Projects that propose to conduct initial development and coordination activities that leverage the findings of a needs assessment and a subsequent plan to be conducted during the grant period for each school identified in the application.”

The Coalition recommends that this funding is for three years, and that the Department make this an absolute priority.

Many communities across the country have expressed their interest and some are in the beginning stages of development for which federal funding would catalyze the start of their work.

Proposed Priority 2—Multi-Local Educational Agency Grants

The Coalition recommends that the Department change this Priority to “Implementation Grants” and change the language to state “Projects that propose to implement and sustain full-service community schools in one or more LEAs.” We added the word “sustain” in our amended language to distinguish this category from the prior one (Capacity-Building and Development grants) to require that the applicants

demonstrate plans to sustain implementation of each identified school beyond the grant period, as well as to develop or strengthen system-level (e.g. whether it is the school district, city, county, government agency, or nonprofit intermediary) infrastructure within and, as applicable, across, school districts. To support grantees to sustain the work, we recommend the Department provide or facilitate guidance and technical assistance starting in year one of the grant in planning for that transition from this federal grant to other funding. We recommend that the funding available to grantees be commensurate to the number of LEAs within a grant. We recommend that grantees in this category receive five years of funding and that this is an absolute priority.

From our experience working directly with community school practitioners over two decades, we know the importance of one cohesive system developed in collaboration among two or more community-wide organizations (e.g. school district, city, or county) to fully commit and invest in this strategy in order to maximize impact and sustainability. We have also seen the power of an intermediary (e.g. nonprofit, local government, or consortium) to grow and sustain a system of Community Schools across more than one school district. Our recommended change recognizes and enables both scenarios for this funding priority. We believe it is important to require applicants to describe how they plan to sustain implementation at each school site to ensure that their work can continue and grow after the grant period ends. We also believe it is important for applicants to describe how they will use some of the funding to develop or strengthen system-level infrastructure to support and sustain the identified full-service community schools.

Further, we recommend striking “within the same state” to allow collaborations to form based on community identity, such as a geographic or Tribal identity that sometimes cross state lines, as in Appalachia and other regions.

Proposed Priority 3—State Scaling Grants

The Coalition supports the Department’s inclusion of a grant category for states to support and expand Community Schools, as is also reflected in the Full-Service Community Schools Expansion Act. We also support the requirement for states to commit to sustain the program “beyond two years after the term of the grant.”

The Coalition recommends that the Department keep consistent, and make explicit in the Request for Proposals, that the eligible entities for this and other categories meet the eligibility in the program statute in the Every Student Succeeds Act: “a consortium of-(a)(i) One or more LEAs; or (ii) The Bureau of Indian Education; and (b) One or more community-based organizations, nonprofit organizations, or other public or private entities.” The Coalition recommends that either the SEA may apply as part of this consortium, or that the consortium must include documentation from the SEA, in the form of a letter of support, outlining the SEA’s commitment to and partnership with the consortium.

The Coalition recommends removing the requirement for a certain number of LEAs to participate in this grant, and instead recommends leaving the specific number of LEAs to the discretion of the state. Accordingly, as is recommended for Priority 2, the Coalition recommends that the funding available to grantees be commensurate to the number of LEAs included within a grant.

The Coalition recommends the Department require that the applicant prioritize districts by need to ensure that federal resources are going to the students that need them the most. The Coalition specifies the recommended type of need through an additional selection criterion outlined below.

The Coalition recommends that the Department require states as a condition of eligibility to identify or to establish a state steering committee (which may be a previously existing body) that, modeled after language in the Full-Service Community Schools Expansion Act, represents relevant Community Schools' stakeholders, including educators and other school staff, community school initiative leaders, education union or association designees, family leaders participating in community school programs, community partners, and community school coordinators from schools already implementing Community Schools in the state and that, in addition to serving as an advisory committee, also has the authority to make decisions about the design, implementation, and evaluation of state efforts for this grant. Requiring the establishment of this steering committee will help states to build on existing experience and wisdom and ensure inclusivity of key constituents that will ultimately strengthen the impact of the work during and beyond this grant.

Finally, the Coalition recommends that this category of grants is for five years and that this is an absolute priority.

Proposed Priority 4—Participation in the National Evaluation

The Coalition does not support this proposed priority as written, though the Coalition does support a national evaluation for the program. Given the strong need and demand for Community Schools along with the diversity of Community Schools across the country, a randomized control trial evaluation would not only exclude some of the applicants' proposed schools at a time when they need and want this strategy, implementing a randomized control trial evaluation would also be difficult to ensure and ascertain common practices across grantees that are most helpful for practitioners and policymakers to understand and advance.

Instead, the Coalition recommends that the Department establish an Advisory Group to help design a national evaluation, comprised of individuals who have either strong research and/or direct experience with community schools, and who would bring a wide range of evaluation techniques to consider.

In addition, the Coalition recommends that the Department add an evaluation as a requirement for all grantees, and we elaborate on this in the "Proposed Applicant Requirement" section below.

Proposed Priority 5—Evidence-Based Integrated Student Supports

The Coalition does not support this as a proposed priority. The Coalition, like the Department, recognizes and underscores the great need for high-quality integrated student supports for all students as they continue to feel the impact of the COVID-19 pandemic. However, applicants will already have to address how they will implement integrated student supports as one of the four pillars of Community Schools, and the needs assessments that grantees will conduct will guide their implementation of this and other pillars. Further, the Department proposes a selection criterion around "The extent to which the design of the proposed project reflects relevant and evidence-based findings from existing literature and includes a high-

quality plan for project implementation integrating the four pillars of full-service Community Schools,” which would help to select those applicants that best demonstrate incorporation of evidence-based practices, including integrated student supports.

Proposed Application Requirement

The Coalition supports the proposed application requirement to address the four pillars of Community Schools and agree with the Department’s rationale that this requirement will help to strengthen the application and implementation processes. We recommend the Department to describe the four pillars thoroughly enough that they are understandable and accessible to applicants who may be new or newer to Community Schools. We also recommend the Department to include examples, either directly in the RFP or directed to the program website, of what strong implementation of these four pillars looks like, both separately and all together, so applicants can have an even clearer understanding of effective implementation of these pillars in action. The Coalition for Community Schools would be happy to share many such examples for the Department to use.

The Coalition recommends that the Department add a **proposed requirement** for a third-party evaluation to be conducted by each grantee. The evaluation must provide meaningful insight and feedback that can be used for real-time program improvement and development. Given the anticipated wide range of grantees’ stages of development and implementation of Community Schools as reflected in the proposed priorities, we recommend that the Department keep the parameters of this evaluation flexible enough to enable grantees to conduct the right evaluation for their stage of development. That said, we also recommend that the Department require collection of both quantitative and qualitative data that may include but not be limited to:

- Student chronic absenteeism rates.
- Student discipline rates, including suspensions and expulsions.
- School climate information, which may come from student, parent, or teacher surveys.
- The provision of integrated student supports and stakeholder services.
- Expanded and enriched learning time and opportunities.
- Family and community engagement efforts and impact.
- Information on the number, qualifications, and retention of school staff, including the number and percentage of fully certified teachers, disaggregated by race and ethnicity, and rates of teacher turnover.
- Graduation rates.
- Changes in school spending information
- Collaborative leadership and practice strategies, which may include building the capacity of educators, principals, other school leaders, and other staff to lead collaborative school improvement structures, such as professional learning communities; regularly convening or engaging all initiative-level partners, such as local educational agency representatives, city or county officials, children’s cabinets, nonprofit service providers, public housing agencies, and advocates; regularly assessing program quality and progress through individual student data, participant

feedback, and aggregate outcomes to develop strategies for improvement; and organizing school personnel and community partners into working teams focused on specific issues identified in the needs and assets assessment.

The Coalition for Community Schools operates a Community Schools Research Practice Network comprised of over 200 researchers across the country who are interested in engaging with schools, districts and organizations leading Community Schools to assess their implementation and impact, and this program is a great opportunity to leverage these and other researchers for high-quality research and evaluation.

Proposed Definitions

The Coalition supports the Department's proposed definitions of Pillars of Full-Service Community Schools, Broadly representative consortium, and History of effectiveness.

The Coalition recommends making explicit the inclusion of student, family, and community voice in the description of Collaborative Leadership within the definition of Pillars of Full-Service Community Schools through amending the language to the following: "Collaborative leadership and practices that...Shall, at a minimum, include a school-based leadership team with representation of student, parent and family leader, and community voice; a community school coordinator; and a community-wide leadership team."

Proposed Selection Criteria

The Coalition recommends the Department add a selection criterion for the level of need, whether based on level of poverty or concentrated poverty, and/or schools that are receiving or are eligible for federal Title I funding. This criterion will help ensure that these limited federal dollars will go to those qualified applicants who demonstrate the most need.

The Coalition supports proposed selection criterion a) "The extent to which the design of the proposed project reflects relevant and evidence-based findings from existing literature, and includes a high-quality plan for project implementation integrating the four pillars of full-service Community Schools and the use of appropriate evaluation methods to ensure successful achievement of project objectives."

The Coalition supports proposed selection criterion b) "The extent to which the applicant will ensure that a diversity of perspectives is brought to bear in the design and operation of the proposed project, including those of families, educators and staff, beneficiaries of services, school leadership, and community leadership." However, we request that the Department include children and youth in the list of specific constituencies it references.

The Coalition supports proposed selection criterion c) "The extent to which the grantee has plans for a full-time coordinator at each school, includes a plan to sustain the position beyond the grant period, and a description of how this position will serve to integrate, coordinate, and deliver pipeline services at each school." However, we recommend striking "*deliver pipeline services*" and replacing it with "*facilitate programs and partnerships*" to reflect that Coordinators do not themselves or alone deliver programming or services, but instead facilitate these, and these partnerships go beyond "services" to include enrichment, professional learning, and other opportunities. In addition, we recommend adding to the criterion

language, in the list of responsibilities a Coordinator leads, the following essential responsibility of a Coordinator: “lead a comprehensive needs and assets assessment that includes students, school staff, families, community members, and partners.”

The Coalition supports proposed selection criterion d) “The extent to which the grantee has a consortium broadly representative of community stakeholders and needs.” So as not to unfairly penalize applicants that do not yet have such a consortium in place, the Coalition recommends that the Department amend the language to say, “*The extent to which the grantee has, or demonstrates a strong plan to have, a consortium broadly representative of community stakeholders and needs.*” This will ensure that applicants that may be new to this work have an opportunity to describe how they will develop this consortium.

The Coalition supports the proposed selection criterion e) “The extent to which the applicant demonstrates a history of effectiveness.”

Conclusion

On behalf of the over 100 organizations signed below, we appreciate the opportunity to submit our comments and look forward to working with you to support all the people and communities that will receive this award.

Sincerely,

Coalition for Community Schools, Institute for Educational Leadership

National Partners:

Afterschool Alliance

American Federation of Teachers

ASCD

Camp Fire Patuxent Area Council

Center for Health and Health Care in Schools

Creative Scenarios, LTD

Education for Engaged Citizens

First Focus on Children

Forum for Youth Investment

Healthy Schools Campaign

Institute for Collaborative Leadership

Institute for Public Life and Work

MENTOR

National Association for Family, School, and Community Engagement

National Association of School Nurses

National Association of Secondary School Principals

National Center for Community Schools

National Education Association

Netter Center for Community Partnerships, University of Pennsylvania

Parent Teacher Home Visits

Partners for Education at Berea College

Public Advocacy for Kids (PAK)

RespectAbility

Rural School and Community Trust

School-Based Health Alliance

StriveTogether

Teacher-Powered Schools

The NEA Foundation

YMCA of the USA

State Partners:

(MCCOY) Marion County Commission on Youth, Inc. Indianapolis, Indiana

AFT New Mexico Albuquerque, NM

AFT-Maryland Baltimore, MD

Baltimore County Schools Rosedale, Maryland

Binghamton University Community Schools Binghamton, NY

CA Community Schools Learning Exchange California

California Federation of Teachers Burbank, CA

Civic Nebraska Lincoln, Nebraska

COFI/Power-PAC IL	Chicago IL
EduCare Foundation	Van Nuys, CA
Florida Memorial University	Miami Gardens, FL
Forward Arkansas	Little Rock, Arkansas
Hawai'i Afterschool Alliance	Honolulu, HI
Indiana Community Schools Network	Indianapolis, Indiana
Innovation Bridge	Sacramento, CA
JADe Strategies	Jacksonville, FL
Maryland Coalition for Community Schools	Baltimore, Maryland
Maryland Out of School Time Network	Baltimore, Maryland
New Mexico Statewide Community School Network	Santa Fe, New Mexico
New York State Community Schools Network	Troy, NY
NJ Community Schools Coalition	Princeton, NJ
NYSUT	Latham, NY
Oregon School-Based Health Alliance	Portland, OR
Rural Community Alliance	Little Rock, Arkansas
Save Our Schools NJ Community Organizing	Princeton, NJ
Texas AFT	Austin, Texas
United Federation of Teachers / United Community Schools	New York, New York
University of Maryland, Baltimore	Baltimore, Maryland

Local Partners:

ABC Community School Partnership	Albuquerque, NM
Appleton Area School District	Appleton, WI
Baltimore City Public Schools OCEE Community Schools	Baltimore, Maryland
BECAUSEICAN INC	Greenbelt, MD
Binational Parents Leadership Institute	San Bernardino, CA

Boys & Girls Clubs of Southwest Washington Vancouver, WA

Boys and Girls Clubs of Lincoln / Lancaster County Lincoln, NE

Bright Key Wiregrass Community Schools Dothan, AL

CAMP YDP Paterson, NJ

Cherry Creek Education Association Aurora, Colorado

Children's Aid New York, New York

Children's Institute Los Angeles, CA

City of Little Rock Little Rock, Arkansas

commonUNITYproperty Evanston, Wyoming

Community Services Foundation Seat Pleasant, MD

Crim Fitness Foundation Flint, MI

East Bay Agency for Children Oakland, CA

Elev8 Baltimore, Inc Baltimore, Maryland

Family Service Association of Lincoln Lincoln, NE

Gardner Pilot Academy Allston, MA

Gilmore Memorial Preschool, Inc. Paterson, NJ

Health N Wellness Services, LLC/Providing Full-Service Community School Health Centers Paterson, NJ

Heartland Lakes Community School Park Rapids, MN

Henrico Education Foundation, Inc. Richmond, Virginia

Horseshoe Bend School District Horseshoe Bend, Idaho

Howe Community Elementary School -GBAPS Green Bay, WI

Indianapolis Coalition of Community School Partnerships Indianapolis, Indiana

Introspect Youth Services, Inc. Chicago, Illinois

Iroquois School District Erie, Pennsylvania

Kent School Services Network Grand Rapids, Michigan

Latinos United for Priorities in Education Chicago, Illinois

Lincoln, NE Public Schools Lincoln, NE

Little Rock School District Stephens Elementary Community Site Little Rock, Arkansas
Los Angeles Education Partnership Los Angeles, CA
Lowell Full-Service Community Schools Lowell, MA
Mercer Street Friends Trenton, NJ
Metro Nashville Public Schools - Community Achieves Nashville, Tennessee
Neighborhood Assistance Office Paterson, NJ
New Village Girls Academy Los Angeles, CA
Noser Consulting LLC Nashville, Tennessee
Oasis - A Haven for Women and Children Paterson, NJ
Paterson Alliance Paterson, NJ
Paterson Education Foundation Paterson, NJ
Peaceful Schools Syracuse, NY
Phipps Neighborhoods New York, NY
Pittsburgh Public Schools Pittsburgh, PA
Prince George's County Public Schools Landover, Maryland
Replications, Incorporated New York, NY
Robinson Elementary Community Hub Toledo, Ohio
Rural Resiliency Community Alliance Van Buren, Maine
San Francisco Beacon Initiative San Francisco, CA
Say Yes Buffalo Buffalo, NY
St. Lawrence County Health Initiative, Inc. Potsdam, NY
St. Paul's Community Development Corporation Paterson, New Jersey
STEM Champions of Baltimore Inc Baltimore, MD
Sun Prairie Community Schools Sun Prairie, WI
Tenderloin Community School San Francisco, CA
The Amazing Help Paterson, NJ
The United Way of Treasure Valley Boise, Idaho

Union City Area School District Union City, NJ

United Way of Erie County Erie, PA

United Way of Greater Milwaukee & Waukesha County Milwaukee, WI

United Way of the Greater Lehigh Valley Allentown, PA

Vancouver Public Schools Vancouver, WA

Wayne MOST - Maximizing Out of School Time Wayne County, NY

Zone 126 Queens, NY

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Marty Blank, Founder, Coalition for Community Schools

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Jane Quinn, Former Director, National Center for Community Schools and Founding Steering Committee Member, Coalition for Community Schools

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