June 5, 2012

Secretary Arne Duncan
U.S. Education Department
400 Maryland Avenue SW
Washington, DC 20024

Dear Secretary Duncan,

The Coalition for Community Schools ("Coalition") at the Institute for Educational Leadership is an alliance of more than 150 organizations representing education, youth development, health and mental health services, social and emotional learning, community development, and related fields. The Coalition advances opportunities for the success of children and youth, as well as their families and communities, by promoting the development of more and more effective community schools.

We are very pleased that the research-based principles that drive the work of community schools across the country have been embedded into the draft RTT-D guidance and hope the following comments will help the Department and Local Education Agencies to strengthen this emphasis even further.

The Coalition is most excited that the only competitive preference priority focuses on results, resource alignment, and integrated services. This section is consistent with the principles of community schools and other place-based strategies that the Department has supported.

Under the competitive preference, the Department requires "coherent and sustainable partnership with public and private organizations." This type of partnership is consistent with the leadership group comprised of key school and community stakeholders that are found in community school systems around the country.

Recognizing that standard test scores are insufficient for measuring student success, the Department also requires the aforementioned partnership to be organized to support a comprehensive results framework that includes education, family, and community results. We applaud the Department for its clear emphasis on a broad set of results that help create the conditions for teaching and learning.

Significantly, the Department also requires districts and their partners to identify how staff and families at the *school-site* will create the infrastructure and decision-making processes to assess needs and identify supports for students, families, and the community.

The Department's draft guidance closely aligns with the community school strategies and structures described in the Coalition's guide *Scaling Up School and Community Partnerships: The Community Schools Strategy*.

We are also heartened that the Department will require local review and comment from municipalities. Developing support from local jurisdictions is critical to successful implementation of a comprehensive strategy at the local level.

Eligibility Criteria

We are concerned about the requirement that applicants must meet a threshold of serving a minimum of 2,500 students. While consortia are a promising strategy, there is a cost in developing consortia that may make such applicants challenging, if not prohibitive for small rural districts. The Coalition suggests the Department reduce the threshold to under 2,000 students and fund these smaller school systems or consortia proportional to their size.

Absolute Priority 1, Personalized Learning Environments

The Department's emphasis on personalizing instruction and supports to each child is consistent with best teaching practices. We suggest clarifying the strategies for personalization of supports however by modifying the sentence to include important social-emotional supports that create the conditions for learning (italicized):

> "…to create student centered learning environment(s) that are designed to: significantly improve teaching and learning through the personalization of strategies, tools, and *academic and social-emotional* support*s* for teachers and students that are aligned with college- and career-ready standards…."

Selection Criteria; A. Vision; 2e. Student attendance

[Research](#) has demonstrated the importance of chronic absence as an indicator of student's being at-risk of longer term school failure, and the potential for needing additional family supports. We suggest 1) either modifying the student attendance definition to include chronic absence or 2) adding an additional indicator that focuses specifically on chronic absence.

The definition of student attendance should be changed to:

> *Monitoring the percent and number of students who are chronically absent – missing 10% or more of school over the course of a year for any reason including excused and unexcused absences and suspensions.*

B. District Capacity and Success Factors; Reform Conditions; 3) Meaningful stakeholder engagement and support

The Coalition applauds the Department's focus on engaging local stakeholders. For letters of support from key community stakeholders (B3b) to be meaningful, however, they must have a voice in the planning process (B3a). This change would be consistent with the Department's continued emphasis on deep community engagement.

Consequently, we propose adding to 3a the following in italics:

"A description of how families, teachers, and principals in participating schools (as defined in this document) *and such key community stakeholders as parents and parent organizations, students and student organizations, early learning programs, the business community, civil rights organizations, advocacy groups, local civic and community-based organizations, local government agencies, the local school employee organization, and institutions of higher education (IHEs)* have been engaged in the development of the proposal…"

*Please note, we have modified "and/or" in the list to just "and" because it represents a more inclusive approach to partnerships. We have made this change throughout our recommendations.

To strengthen the definition of key stakeholders (we suggest adding "community" to that description) throughout the document, we suggest adding a new definition to the guidelines based on the existing language.

Key Community Stakeholders: *Includes parents and parent organizations, students and student organizations, early learning programs, the business community, civil rights organizations, advocacy groups, local civic and community-based organizations, local government agencies, the local school employee organization, and institutions of higher education (IHEs).*

C. Preparing Students for College and Careers; 1) Learning a) and b)

The work of community schools demonstrates that community partners have much to contribute to student academic success, through expanded learning, business partnerships, and internships for example. In this context we note that the role of community partners is noticeably absent from the key actors responsible for learning in this section. We suggest changing C1a and C1b to include the italicized:

"With the support of parents, teachers, and other educational support specialists and personnel, *and such key community stakeholders as parents and parent organizations, students and student organizations, early learning programs, the business community, civil rights organizations, advocacy groups, local civic and community-based organizations, the local school employee organization, and institutions of higher education (IHEs),* students…"

C. Preparing Students for College and Careers; 1) Learning a.iv)

A connection to the communities where student's live in the curriculum is an [important component](#) of creating engaging and meaningful learning experiences. Consequently, we suggest adding the following in italics:

i) "Understand the relevance of what they are learning to their lives and goals *and the communities in which they live*."

iv) "Are able to be involved in learning experiences of personal interest, including a focus *on experiences connected to the student's community*;"

C. Preparing Students for College and Careers; 2) Teaching a.ii)

Similar to the comments above, the guidelines should more clearly emphasize the importance of the teaching and learning about community issues in order to increase the relevance of the curriculum to students and improve their engagement. We suggest:

"Adapt instruction in response to academic needs, optimal learning approaches (e.g., discussion, project-based learning, videos, audio, manipulative), *the communities in which they live*, and interests of students;"

C. Preparing Students for College and Careers; 2) Teaching c)

We suggest modifying the definition of "school leadership team" which is used in 2c to include a representative of key community stakeholders. We suggest adding: "community members *and a representative of key community stakeholders*".

C. Preparing Students for College and Careers; 3) Policy and Infrastructure a)

We suggest adding a fourth point to reflect the growing recognition of the Universal Design for Learning principles as defined in the Higher Education Act. We suggest adding

iv. The application of Universal Design for Learning principles as defined in the Higher Education Act.

C. Preparing Students for College and Careers; 3) Policy and Infrastructure b.i & ii)

We suggest clarifying "other stakeholders" using the definition for Key Community Stakeholders we recommended above.

C. Preparing Students for College and Careers; 4) Performance Measurement

Surveys of educators (f) and students (g) should also include climate, culture, and the conditions for learning in order to paint a complete picture of the conditions in which teachers teach and students learn. Thus, we suggest making the following changes to the definitions for student survey:

"Student survey: Measures students' perspectives on teaching, learning, and related supports *(e.g., school climate, school culture, and the conditions for learning)* in their classrooms and schools. The surveys must be research-based, valid, and reliable."

We suggest adding a parallel definition for **educator survey** (currently mentioned, but undefined) that would read:

> ***Educator survey:*** *Measures educators' perspectives on teaching, learning, and related supports (e.g., school climate, school culture, the conditions for learning, faculty trust, etc.) in their classrooms and schools. The surveys must be research-based, valid, and reliable.*

Finally, we strongly urge the Department to add a **parent survey** that would help districts learn more about parent engagement and their needs in supporting student learning. We suggest adding C4h) to read:

> ***Parent survey:*** *Measures parents' perspectives on teaching, learning, and related supports (e.g., school climate, school culture, and the conditions for learning, teacher and principal support, opportunities for parent engagement) in classrooms and schools. The surveys must be research-based, valid, and reliable.*

In order for all of these surveys to be useful, the Department should require applicants to explain how they are going to use the survey results to make changes to their plans, rather than just require a count and percentage of how many people complete the survey. We suggest the following language:

> The number and percentage of participating (educators, students, or parents) who complete a survey…*and specific strategies for how the applicant will incorporate survey results to inform their approach.*

D. Transition Plan and Continuous Improvement; 3)

As illustrated in the guidelines and consistent with their previous statements, the Department correctly places a high value on engagement with parents and community stakeholders. However, we found the following point vague in regard to engagement: "High-quality plan for communication with both internal and external stakeholders." We suggest specifying what communication the Department would like to see. It is unclear whether internal and external stakeholders should be included in the development of transition plans, updated about progress toward implementation, etc. Consistent with the principles of community schools, we suggest that communication rests on strong community engagement where internal and external stakeholders are working in partnerships on the preparation and implementation of transition plans. We suggest changing D3 to read: *3) High-quality strategy for engaging with internal and external stakeholders in the development, implementation, and assessment of the plan; and*

F. Optional Budget Supplement

The concept of a budget supplement is an innovative approach to promote creative local practices. We would suggest that the examples in F1 be broadened to include: *family and community engagement; family and community support; social, emotional, and health supports; expanded learning time and opportunities; and conditions for learning.*

Competitive Preference Priority—Results, Resource Alignment, and Integrated Services

The Coalition is encouraged that the Department has made results, resource alignment, and integrated services through community partnerships key foci of this grant competition. We would recommend,

however, that the Department either make this competitive priority part of the Absolute Priority or an additional Absolute Priority. Clearly the Department values collaboration towards results and making it an Absolute Priority would only make their case more explicit to applicants.

The Coalition would suggest the following minor changes to the language of the Competitive Preference Priority in order to include key community stakeholders in the development and implementation of the strategies described in the priority (in italics):

> Add "*parent and neighborhood groups*" to the list of public and private organizations in (1). Parent and community buy-in and participation are essential to successful implementation.

> "(3) How the partnership will enable…the integration of education and other services…for participating students *and their families*"

> "(4) How the partnership will build the capacity of staff in participating schools *and staff of community stakeholders and partners*…by providing them with tools and supports to"

Definitions

Finally, research shows that families have a significant contribution to make when developing and implementing individualized or personalized learning plans. Consistent with the Department efforts to boost family engagement we propose the following definition of personalized learning plan as follows in italics:

> "Personalized learning plan: A formal document, *developed in partnership with parents and school staff*, available in digital and other formats both in and out of school to students, parents, and teachers, that, at a minimum…"

Please feel free to contact me if you have any questions. I can be reached at blankm@iel.org.

Sincerely,

Martin J. Blank
President, Institute for Educational Leadership &
Director, Coalition for Community Schools