

# National Family, School, and Community Engagement Working Group

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The Honorable Arne Duncan  
Secretary  
U. S. Department of Education  
400 Maryland Avenue, SW  
Washington, D.C. 20202

**Docket ID:** ED-2009-OII-0012

**Attention: Investing in Innovation Fund Comments from the National Family, School, and Community Engagement Working Group**

Dear Secretary Duncan,

The National Family, School, and Community Engagement Working Group (FSCE Working Group) appreciates the opportunity to submit comments on the U.S. Department of Education's Federal Register Notice regarding the Investing in Innovation Fund's (I3 Fund) proposed priorities, requirements, definitions, and selection criteria.

The National Family, School, and Community Engagement Working Group is a leadership collaborative whose purpose is to inform the development and implementation of federal policy related to family, school, and community engagement in education. It is dedicated to mobilizing cradle to career pathways and partnerships among families, schools, and communities to promote kindergarten and college readiness, improve schools, and increase student achievement.

The FSCE Working Group believes families play critical roles in student success. They support their children's learning, guide them through a complex school system, advocate for more and improved learning opportunities, and collaborate with educators and community organizations to achieve more effective educational opportunities. Families raise their children in multiple settings and across time, in collaboration with many others. Strong family engagement is:

- A shared responsibility in which schools and other community agencies and organizations are committed to engaging families in meaningful and culturally respectful ways, and families are committed to actively supporting their children's learning and development.
- Continuous across a child's life, spanning from Early Head Start programs to college preparation high schools.
- Carried out everywhere that children learn – at home, in pre-kindergarten programs, in school, in after-school programs, in faith-based institutions, and in community programs and activities.

**The Family, School, and Community Engagement Working Group**

The FSCE Working Group applauds the Department's efforts to support innovative programming that improves student achievement. We offer our recommendations to strengthen the impact of the I3 Fund on closing the achievement gap and to assist the Department in achieving positive outcomes in its four core assurance areas. Research demonstrates that family engagement in a child's education raises student achievement, improves behavior and attendance, decreases drop-out rates, and improves the emotional and physical well-being of children. Effective family engagement is critical to closing the achievement gap, contributing to increased academic achievement, regardless of parents' education level, ethnicity, or socioeconomic background.<sup>1</sup> Family engagement is also cost-effective and can raise student academic achievement so substantially that schools would need to increase spending by more than \$1000 per pupil to gain the same results.<sup>2</sup>

## OVERVIEW OF THE INVESTING IN INNOVATION FUND

### *Effect Size*

**Recommendation:** We encourage the Department to consider effect size in the context of the evaluation question being posed. It is not enough to ask what works but to examine the conditions under which the program works best. Using this approach, specific program characteristics are related to effect sizes, thereby providing insight into what works for whom under what types of conditions. Also, there is no agreement among evaluators from various disciplines about the interpretation of effect size. Any interpretation must occur in an intervention's wider context. Physicians, for example, prescribe aspirin to adult patients even if the effect size of aspirin in reducing heart attacks is .03. Their advice is made given the small cost and potentially large benefit of the intervention.<sup>3</sup> (*Page 52216*)

### *Scale-up Grants*

**Recommendation:** We recommend that the Department carefully consider the evidence and research required for programs that receive 'scale up grants,' which will receive the bulk of innovation funds. The language in the overview implies these grants may go to programs that are narrowly focused and that easily lend themselves to randomized control trials. The four priority areas embody complex issues and require complex solutions, and there is a danger that easily controlled, random programs rather than systemic solutions will be elevated through the innovation fund. We define systemic solutions as those that embody individual, organizational, and policy changes at several levels of an implementation chain. In a review of workforce development and child outcomes in the human services sector (early childhood, social work, afterschool and juvenile justice workers), for example, Harvard Family Research Project (HFRP) created a logic model to conceptualize the linkages and pathways in workforce development (training/professional development, organizational capacity and policy supports) and child outcomes. The research that led to this model revealed that professional development was the

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<sup>1</sup> Henderson A. and Mapp, K. (2002). A New Wave of Evidence: The Impact of School, Family, and Community Connections on Student Achievement. Southwest Educational Development Laboratory. . Fan, X., & Chen, M. (2001). Parental involvement and students' academic achievement: A meta-analysis. *Educational Psychology Review*, 13(1), 1-22. Jeynes, W. H. (2003). A meta-analysis: The effects of parental involvement on minority children's academic achievement. *Education and Urban Society*, 35(2), 202-218.

<sup>2</sup> Houtenville, A. and Conway, K. (2008). Parental Effort, School Resources, and Student Achievement. *Journal of Human Resources*, XLIII, 2. Pp-437-53.

<sup>3</sup> See Kathleen McCartney and Eric Dearing, Evaluating Effect Size in the Policy Arena, *The Evaluation Exchange*, Vol. 8(1) 2002.

most common strategy, but that it was not sufficient to guarantee quality and staff retention. A complex host of factors, ranging from compensation to supervisory structures and organizational culture affected whether the skills imparted through professional development could make a sustainable difference in practice.<sup>4</sup> (*Page 52216 (1)*)

#### *Validation and Development Grants*

**Recommendation:** Given the solid research base that correlates family engagement with positive student outcomes, we strongly recommend funding promising family, school, and community engagement innovations as part of validation and development grants. We acknowledge that there have not been sufficient public or private investments in high quality evaluations of family, school, and community engagement programs and initiatives and as a result, the field is not well positioned for scale-up grants; however, it is ready for validation and development grants. (*Pages 52216-52217 (2) and (3)*)

**Recommendation:** In order to further examine the impact of family engagement programs and policies on student achievement, we recommend that if validation and development grants include a family engagement component as part of a comprehensive intervention, that appropriate designs isolate the value added of the family engagement component. HFRP’s review of family-strengthening interventions designed to address children’s behavioral and academic outcomes that were evaluated with experimental or quasi-experimental designs, showed that few of the interventions specifically isolated the parenting component’s impact relative to the total intervention. The interventions, which were directed at parents and children, had a positive impact on parenting and family engagement as well as on students’ academic and behavioral outcomes.<sup>5</sup> (*Pages 52216-52217 (2) and (3)*)

**Recommendation:** Insert “and family engagement” after “climate” in the list of intermediate variables correlated with student achievement outcomes. (*Page 52216 (2)*)

## **PROPOSED PRIORITIES**

### *Types of Priorities*

**Recommendation:** The FSCE Working Group is in strong support of the Department’s Absolute and Competitive Preference Priorities for the I3 Fund. We recommend that in order to strengthen the impact of the I3 fund on student achievement, the Department add “Innovations that Support Systemic Family Engagement” as a Competitive Preference Priority. Not only has research demonstrated that family engagement improves student achievement and attendance and reduces dropouts<sup>6</sup>, but also the Department has identified family engagement as a strategy for school turnaround and transformation in its Federal Register Notices regarding the Race to the Top Fund and School Improvement Grants. Prioritizing family engagement would facilitate the development, implementation, and evaluation of best practices in the field and encourage collaboration between nonprofits and LEAs to take promising practices to scale. (*Page 52217*)

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<sup>4</sup> *The Evaluation Exchange*, Vol. 11(4) 2005/2006

<sup>5</sup> See Lessons from Family Strengthening Interventions: Learning from Evidence –based Practice, <http://www.hfrp.org/publications-resources/browse-our-publications/lessons-from-family-strengthening-interventions-learning-from-evidence-based-practice>.

<sup>6</sup> Henderson and Mapp, 2002. Fan and Chen, 2001.

### *Proposed Absolute Priorities*

#### Proposed Absolute Priority 1-Innovations that Support Effective Teachers and School Leaders

**Recommendation:** Insert “and family engagement” after “tied to student growth,” so that it is included as a criterion in teacher and principal evaluation systems. A recent study identifies teachers’ relationships with parents as a key factor in teacher retention and stability.<sup>7</sup> (*Page 52218, Background, Priority 1*)

**Recommendation:** Insert “including the ability to engage families in student learning” after “multiple rating categories of effectiveness” and before “multiple measures” to ensure that the ability to partner with parents to improve student achievement is a multiple rating category of effectiveness in teacher and principal evaluation systems. (*Page 52218, Statement of the Proposed Absolute Priority 1*)

**Recommendation:** Insert “and parent” after “designed and developed with teacher” and before “involvement”. Schools and districts should include multiple stakeholders, including parents and families in the development of evaluation systems for teachers and principals. (*Page 52218, Statement of the Proposed Absolute Priority 1*)

#### Proposed Absolute Priority 2-Innovations that Support the Use of Data

**Recommendation:** Change “Providing student achievement and student growth data to teachers and principals, including estimates of individual teacher impact on student achievement, is key to driving educational reform in general and improvements in the classroom, in particular,” to read “Providing student achievement and student growth data to teachers, principals, and families, including estimates of individual teacher impact on student achievement, is key to driving education reform in general and improvements in classroom instruction as well strategies for families to support student learning at home.” The use of data to track student growth and implement and assess interventions should occur in all learning settings so students are supported at school and at home. (*Page 52218, Background, Priority 2*)

**Recommendation:** Insert “and support student learning at home” after “and overall effectiveness” to emphasize the importance of using data to support and reinforce student learning at home. (*Page 52218, Background, Priority 2*)

**Recommendation:** The FSCE Working Group is in strong support of the Department’s inclusion of families in the list of stakeholders who use data to inform decision-making and recommends that the Depart insert “improve families’ ability to support student achievement at home” after “improve student achievement or student growth” and before “and teacher.” Families should have data readily available to them not only to make recommendations on and decisions about their children’s instruction at school but also to inform the supports for learning they provide at home. (*Page 52218, Statement of the Proposed Absolute Priority 2*)

#### Proposed Absolute Priority 3—Innovations that Complement the Implementation of High Standards and High-Quality Assessments

**Recommendation:** change (c) to read, “translate the standards and information from assessments into practices and interventions that meet the needs of the students, including high need students, in the classroom and strategies that support student achievement at home and in all learning settings.” By effectively engaging family members, community-based organizations,

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<sup>7</sup> Consortium on Chicago School Research at the University of Chicago Urban Education Institute. (June 2009). The Schools Teachers Leave: Teacher Mobility in Chicago Public Schools.

and other student support providers in using high-quality standards and assessment data to inform student support and instruction, schools and districts build their capacity to improve student achievement. (*Page 52218, Statement of the Proposed Absolute Priority 3(c)*)

#### Proposed Absolute Priority 4—Innovations that Turn Around Persistently Low-Performing Schools

**Recommendation:** Consistent with the Department’s Race to the Top Notice, which listed family and community engagement as a strategy for school transformation, change (2) to read “integrating community-oriented supports and on-going mechanisms for family and community engagement that improve student achievement.” (*Page 52218, Statement of the Proposed Absolute Priority 4 (b)*)

#### Proposed Competitive Preference Priority 5—Innovations for Improving Early Learning Outcomes

**Recommendation:** Insert “and their families” after “economic investment in young children” and before “can yield dramatic economic benefits.” Research has demonstrated that engaging the families of young children is critical to their success later in life.<sup>8</sup> (*Page 52219, Background, Priority 5*)

**Recommendation:** Change subsection (a) to read, “improving young children’s school readiness (including social, emotional, cognitive, and linguistic) through early childhood and family literacy programs so that children are prepared for success in core academic subjects. Supporting the literacy skills of family members as well as children allows them to meaningfully engage in supporting their children’s early literacy development that is critical to their academic achievement.” (*Page 52219, Statement of Proposed Competitive Preference Priority 5(a)*)

**Recommendation:** Change subsection (c) to read, “partnering with families and community-based organizations to improve alignment, collaboration, and transitions between early learning programs and programs for school-age children in preschools, and in kindergarten through third grade.” (*Page 52219, Statement of Proposed Competitive Preference Priority 5(c)*)

#### Proposed Competitive Preference Priority 6—Innovations that Support College Access and Success

**Recommendation:** Insert “and their families” after “programs for K-12 students” and before “that address.” Family members are key determinants of students’ college-readiness and success and information about college preparedness, access, and affordability, should be available to them so they can support their children in making decisions about their future. (*Page 52219, Statement of Proposed Competitive Preference Priority 6*)

#### Proposed Competitive Preference Priority 7—Innovations to Address the Unique Learning Needs of Students with Disabilities and Limited English Proficient Students

**Recommendation:** Insert “and to engage families to support the learning of students with disabilities or limited English proficiency at home” after “to address the unique learning needs of students with disabilities, or the linguistic and academic needs of limited English proficient students,” in order to build capacity to improve student achievement for these groups of students

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<sup>8</sup> Weiss, H. B., Caspe, M., & Lopez, M. E. (2006). Family involvement in early childhood education. Family involvement makes a difference research brief No. 1. Cambridge, MA: Harvard Family Research Project.

in all learning settings. Research shows that family engagement can improve student achievement regardless of parents' education level or socioeconomic background<sup>9</sup>, and, in fact, disadvantaged children appear to benefit even more from family involvement than their more-advantaged peers.<sup>10</sup> (*Page 52219, Statement of Proposed Competitive Preference Priority 7*)

#### Proposed Competitive Preference Priority 8—Innovations That Serve Schools in Rural LEAs

**Recommendation:** Insert “improve family and community engagement” between “increase high school graduation rates” and “or improve teacher and school leader effectiveness.” Rural schools and LEAs face unique barriers to engaging families including: limited transportation and access to the school site, limited extracurricular programming for students, and a lower concentration of community-based resources for students and families. Innovations that address these challenges leverage systemic family engagement to increase positive outcomes for students. (*Page 52219, Statement of Proposed Competitive Preference Priority 8*)

### **PROPOSED REQUIREMENTS**

**Recommendation:** Insert a new requirement (5) to read, “Demonstrate sustainability through support from and partnerships with parents, family members, and community-based organizations” and change current requirement (5) to requirement (6). Applicants must work with key stakeholders in their communities to ensure that their project meets local needs and builds the capacity and public will that will ensure sustainability of the project. (*Page 55220 (5)*)

### **PROPOSED DEFINITIONS**

#### *2. Other Definitions*

**Recommendation:** Include a definition of “Family Engagement.” The FSCE Working Group defines family engagement as: *a shared responsibility of families and schools for student success, in which schools and community-based organizations are committed to reaching out to engage families in meaningful ways and families are committed to actively supporting their children’s learning and development. This shared responsibility is continuous from birth through young adulthood and reinforces learning that takes place in the home, school and community.* (*Page 52221*)

**Recommendation:** Include a definition of “Family Engagement Mechanisms.” The FSCE Working Group believes strong family engagement mechanisms include the following: *(1) support staffing and professional development focused on family engagement; (2) develop research, evaluation, and accountability systems that promote family engagement; (3) create strong cradle to career pathways for family engagement; (4) engage community-based organizations to increase family engagement; and (5) engage families in planning and governance for shared decision making.* (*Page 52221*)

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<sup>9</sup> Henderson and Mapp.

<sup>10</sup> Dearing, E., McCartney, K., Weiss, H. B., Kreider, H., & Simpkins, S. (2004). The promotive effects of family educational involvement for low-income children’s literacy. *Journal of School Psychology, 42*(6), 445-460. Schulting, A. B., Malone, P. S., & Dodge, K. A. (2005). The effect of school-based kindergarten transition policies and practices on child academic outcomes. *Developmental Psychology, 41*(6), 860-871.

## PROPOSED SELECTION CRITERIA

### 1. Scale-Up Grants

**Recommendation:** Insert “engaging families to support student achievement and growth” after “graduation rates” and before “or increased recruitment and placement of high-quality teachers and school leaders.” Applicants that have increased systemic family and community engagement in education can powerfully impact student achievement when given the resources to take their program to scale. (Page 52223, (C-Experience of Applicant) (2) (b) (iii))

**Recommendation:** Insert “families and parent organizations” after “agencies” and before “teachers.” Families are key stakeholders in the education of their children and are critical partners in ensuring the project’s long term success. (Page 52223, (F-Sustainability) (2) (a))

### 2. Validation Grants

**Recommendation:** Insert “engaging families to support student achievement and growth” after “graduation rates” and before “or increased recruitment and placement of high-quality teachers and school leaders.” Applicants that have increased systemic family and community engagement in education can powerfully impact student achievement when given the resources to take their program to scale. (Page 52224, (C-Experience of Applicant) (2) (b) (iii))

**Recommendation:** Insert “families and parent organizations” after “agencies” and before “teachers.” Families are key stakeholders in the education of their children and are critical partners in ensuring the project’s long term success. (Page 52224, (F-Sustainability) (2) (a))

### 3. Development Grants

**Recommendation:** Insert “engaging families to support student achievement and growth” after “graduation rates” and before “or increased recruitment and placement of high-quality teachers and school leaders.” Applicants that have increased systemic family and community engagement in education can powerfully impact student achievement when given the resources to take their program to scale. (Page 52225, (C-Experience of Applicant) (2) (b) (iii))

**Recommendation:** Insert “families and parent organizations” after “agencies” and before “teachers.” Families are key stakeholders in the education of their children and are critical partners in ensuring the project’s long term success. (Page 52225, (F-Sustainability) (2) (a))

The FSCE Working Group recognizes the efforts of the Administration to support effective family engagement within its initiatives funded under ARRA. We appreciate the opportunity provided by the Secretary and the Department to provide feedback on its key reforms. We believe that by making family and community engagement a critical component of the I3 Fund’s proposed priorities, requirements, definitions, and selection criteria, that schools, districts, and nonprofit organizations will be able to leverage systemic family engagement efforts to improve educational outcomes. Please feel free to contact Heather Weiss at [heather\\_weiss@harvard.edu](mailto:heather_weiss@harvard.edu) or (617) 495-9108 or Mishaela Durán at [mduran@pta.org](mailto:mduran@pta.org) or (202) 289-6790 Ext. 201, if further clarification on the comment is needed.

Sincerely,

The National Family, School, and Community Engagement Working Group

**The Family, School, and Community Engagement Working Group**