

National Family, School, and Community Engagement Working Group

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April 11, 2011

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

Attention: Proposed Program Priorities, Requirements, Definitions, and Selection Criteria for the Promise Neighborhood Program

Comment 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 proposed priorities, requirements, definitions, and selection criteria for the Promise Neighborhood Program.

The FSCE Working Group applauds the Department's recognition of the importance of family and community engagement in education, as evidenced by language throughout the proposal, and we submit, for careful consideration, recommendations to strengthen the language and more clearly articulate the importance of systemic, integrated, and sustained family engagement within the Promise Neighborhood Program. More than forty years of research has proven that when parents are involved in their child's education, student achievement increases.¹

Recent research published by the University of Chicago points to parent and family engagement as one of five essential ingredients of sustainable reform in turning around low-performing schools - as vital as school leadership and curriculum alignment.² This finding is especially pertinent and underscores the need to strengthen language to embed family engagement in the Promise Neighborhood program.

¹ Henderson, A., and K. Mapp. *A New Wave of Evidence: The Impact of School, Family, and Community Connections on Student Achievement*. Texas: Southwest Educational Development Laboratory, 2002.

² Byrk, A., P.B. Sebring, E. Allensworth, and J.Q. Easton. *Organizing Schools for Improvement: Lessons from Chicago*. Chicago: University of Chicago Press, 2010.

About the National Family, School, and Community Engagement Working Group:

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, school, 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. Families 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 from child care providers to teachers, coaches, mentors and others.

Recommendations

While the goals of the Promise Neighborhood program are laudable, we believe the Department must adequately embed research-based, effective family engagement into the proposed priorities, requirements, definitions, and selection criteria. It is incumbent that we learn from the Chicago School Reform effort and purposively elevate family engagement so that it is an essential ingredient in school reform and this Promise Neighborhood effort. Following is a list of proposed recommendations we believe will better leverage the Promise Neighborhood to promote the implementation of systemic, integrated, and sustained family engagement policies and practices to improve student achievement and overall well-being.

Proposed Priorities

Proposed Planning Grant Priority 1 [Absolute]: Proposal to Develop a Promise Neighborhood Plan

(a)(4): While the wording within this paragraph may imply the inclusion of parents and families within “the neighborhood and its residents,” we strongly recommend the explicit inclusion of parents and families to emphasize the import role they play in improving outcomes for children and youth. Therefore, we recommend:

*“(a) Working with the neighborhood and its residents (including **parents and families**) and with the schools described in paragraph (2) of this priority; the LEA in which the schools described in paragraph (2) are located; Federal, State, and local government leaders, and other service providers.”*

(ii)(b)(4): We believe plans to collect, synthesize, and share student data to be of paramount importance when communities are devising program plans, and we appreciate the Department’s emphasis on those activities within the priority. However, it is vital that parents be included and prioritized as stakeholders when applicants are looking toward strategies to make collected data accessible, understandable, and actionable. Therefore, we recommend:

*“(ii) How the applicant will link the longitudinal data systems to school –based, LEA, and State data systems; make the data accessible to **parents and families, community residents, program partners, researchers, and evaluators** while abiding by Federal, State, and other privacy laws and requirements;”*

(d)(4): Program success is inextricably tied to the commitment and vision of all community stakeholders – including parents and families of children to be served by the program. We believe this should be reflected within priority language surrounding the governance structure proposed for the Promise Neighborhood. Therefore, we recommend:

*“(4) The governance structure proposed for the Promise Neighborhood, including how the eligible entity’s governing board or advisory board is representative of the geographic area proposed to be served (as defined in this notice), and how residents of the geographic area, **including parents and families of children in schools to be served by the program**, would have an active role in the organization’s decision making; and”*

Proposed Planning Grant Priority 8: Family Engagement in Learning through Adult Education

The FSCE Working Group applauds the Department’s efforts to include family engagement in learning through adult education programs within proposed planning grant priority 8; however we submit that adult education programming is merely one of many strategies employed to implement systemic, integrated, and sustained family engagement in education.

If the intent of the priority is to encourage a focus on continual learning for adults, including parents and families, with, where appropriate, an emphasis on family engagement in student learning, it is the suggestion of the Working Group that this intent be more clearly communicated within two priorities. We do not believe that proposed planning grant priority 8 is sufficient in encouraging implementation grant applicants to embrace true partnership with parents in education reform efforts to benefit children and youth served by the program.

We recommend the eighth priority focus on adult education and continual learning, with a sub-emphasis placed on how the applicant plans to integrate family engagement in education within adult education programming, including the training of adult education providers to ensure that the role of families in the education of children and youth is successfully embedded in offered course and program curricula. The FSCE Working Group strongly recommends the addition of a ninth priority focused on the applicant’s description of how it plans to integrate systemic and sustained family engagement in education (as defined in this comment) as a core component of the Promise Neighborhood program.

Proposed Implementation Grant Priority 1 (Absolute): Submission of Promise Neighborhood Plan

(iv)(a)(2): We agree with the need to prioritize applicants who develop a clear strategy for building a continuum of solutions that addresses neighborhood challenges and are able to identify specific solutions to be implemented by the program. However, we are disappointed that within the specific strategies outlined, parents and families are relegated to the role of direct-service recipients as opposed to strategic partners. As referenced within this comment, recent research by Dr. Anthony Bryk and colleagues found family-school ties to be an integral strategy to successful school turn-around efforts, and that schools with strong family and community ties were four times more likely to make significant improvements in reading and ten times more likely to make significant improvements in math, than schools that had weak ties to their families and community.

Effective family engagement (see recommended definition of “family engagement” within this comment), consists of a shared responsibility in which all stakeholders are committed to the education of children and youth. While the Working Group believes the assessment and provision of family and community supports to be integral to implementation of the Promise Neighborhood program, we believe true family-school partnership to be of equal importance. Therefore, we recommend the inclusion of the implementation of systemic, integrated, and sustainable family engagement in education be listed as a solution within this priority.

(ii)(b)(4): We believe the collection, synthesis, and sharing of student data to be of paramount importance when communities are implementing Promise Neighborhood program plans, and we appreciate of the Department’s emphasis on those activities within the priority. However, it is vital that parents be included and prioritized as stakeholders when applicants are looking toward strategies to make collected data accessible, understandable, and actionable. Therefore, we recommend:

*“How the applicant has linked the longitudinal data system to school-based, LEA, and State data systems; made the data accessible to **parents and families, community residents, program partners, researchers, and evaluators** while abiding by Federal, State, and other privacy laws and requirements; and managed and maintained the system.”*

(d)(4): Program success is inextricably tied to the commitment and vision of all community stakeholders – including parents and families of children to be served by the program. We believe this should be reflected within priority language surrounding the governance structure proposed for the Promise Neighborhood. Therefore, we recommend:

*“The governance structure proposed for the Promise Neighborhood, including how the eligible entity’s governing board or advisory board is representative of the geographic area proposed to be served (as defined in this notice), and how residents of the geographic area, **including parents and families of children in schools served by the program,** would have an active role in the organization’s decision-making.”*

Proposed Implementation Grant Priority 8: Family Engagement in Learning through Adult Education

Again, the FSCE Working Group applauds the Department’s efforts to include family engagement in learning through adult education programs within proposed implementation grant priority 8; however we submit that adult education programming is merely one of many strategies employed to implement systemic, integrated, and sustained family engagement in education.

If the intent of the priority is to encourage applicants to focus on community-based, adult continual learning with, where appropriate, an emphasis on family engagement in student learning, it is the suggestion of the Working Group that this intent be more clearly communicated within two priorities. We do not believe that proposed implementation grant priority 8 is sufficient in encouraging implementation grant applicants to embrace true partnership with parents in education reform efforts to benefit children and youth served by the program.

We recommend the eighth priority focus on adult education and continual learning, with a sub-emphasis placed on how the applicant is integrating family engagement in education within adult education programming, including the training of adult education providers to ensure that the role of families in the education of children and youth is successfully embedded in offered course and program curricula. The FSCE Working Group strongly recommends the addition of a ninth priority focused on the applicant’s description of how it has integrated systemic and sustained family engagement in education (as defined in this comment) as a core component of the Promise Neighborhood program.

Proposed Indicators and Results

We applaud the Department’s efforts to develop a set of comprehensive student results and indicators. We are pleased to see that the Promise Neighborhood communities have an opportunity to determine their own indicators. We provide suggestions below for ways that the indicators in this notice can be strengthened.

I. Align family and community support indicators with education indicators in order to assess how particular strategies—specifically, family engagement and community support—relate to educational results. Given that family and community support indicators and results are intertwined with education indicators and results, we suggest that, whenever possible, results for children and youth contain indicators that illustrate the central role of the family and community in helping students achieve these results. Below are some examples of ways to foster greater alignment of indicators across education and family and community supports. We have organized our examples by results, rather than leading with the indicators as in the existing Tables 1 and 2 in the Federal Register Notice. The bold-faced type indicates where changes have been made to words and phrases within existing results and indicators, or where we have created entirely new results and indicators.

1. RESULT: Children enter kindergarten ready to succeed in school.

INDICATORS:

1. # and % of children, from birth to kindergarten entry, participating in **high-quality** center-based or formal home-based early learning settings or programs, which may include Early Head Start, Head Start, child care or publicly funded preschool. **NOTE:** *Quality matters in order to achieve the readiness goal. We suggest adding a definition of quality that includes (but is not limited to) accreditation by organizations such as the National Association for the Education of Young Children (NAEYC) or meeting the criteria set by state Quality Rating and Improvement Systems.*
2. # and % of three year-olds and children in kindergarten who demonstrate at the beginning of the program or school year age-appropriate functioning across multiple domains of early learning **and development** (as defined in this notice) as determined using developmentally-appropriate early learning **and development** measures (as defined in this notice).
3. For children **from birth** to kindergarten entry, the # and % of parents or family members who report that they read to their child three or more times a week.

2. RESULT: Students are proficient in core academic subjects.

(NOTE: These indicators can also be used for student results regarding transitions from middle grades to high school and high school graduation.)

INDICATORS:

- a. # and % of students at or above grade level according to State mathematics and reading or language arts assessments in at least the grades required by the ESEA (3rd through 8th, and once in high school).
- b. **# and % of students who attend school regularly (i.e., attendance rates are at least 90–92% from kindergarten through twelfth grade).**
- c. For children in kindergarten through the eighth grade, the # and % of parents or family members who report encouraging their child to read books outside of school. **NOTE:** *This is not a new indicator but has been moved from the result “Families and community members support learning in Promise Neighborhood schools.”*
- d. # and % of children who participate in high-quality **structured** learning activities during out-of-school hours or in the hours before and after the traditional school day, **including summer programs, at least three times per week.** **NOTE:** *We suggest elevating this indicator from an option in a footnote to a priority indicator. Also, quality matters in out-of-school time activities in order to achieve learning goals. We suggest defining quality features that include, but are not limited to, well-prepared staff, rich and intentional learning opportunities, and appropriate supervision and structure.*
- e. # and % of children who are suspended or receive discipline referrals during the school year. **NOTE:** *We suggest elevating this indicator from an option in a footnote to a priority indicator.*
- f. **# and % of students that show student growth (as defined in this notice).**

3. RESULT: Youth graduate from high school.

INDICATORS:

- a. Graduation rate (as defined in this notice).
- b. For children in the ninth through twelfth grades, the # and % of parents or family members who report talking with their child about the importance of college and/or career. **NOTE:** *This is not a new indicator but has been moved here from the result “Families and community members support learning in Promise Neighborhood schools.”*

4. RESULT: Students are healthy.

INDICATORS:

- a. # and % of children who have a **certified health provider** where they **regularly** go, other than an emergency room, when they are sick or in need of advice about their health. **NOTE:** *This is to ensure that families access quality health care for dependent children.*

- b. # and % of children who participate in at least 60 minutes of moderate to vigorous physical activity daily.
- c. # and % of children who consume five or more servings of fruits and vegetables daily. *NOTE: We separated Indicators 13 and 14 for greater clarity.*
- d. # and % of students who have access to mental health services.
- e. Teen pregnancy rate.
- f. # and % of students that use illicit drugs (marijuana, crack, cocaine).

5. RESULT: Families and community members support learning in Promise Neighborhood schools.

INDICATORS:

- a. For children from birth to kindergarten entry, # and % of parents or family members who have at least two yearly conversations with an early care and education provider about the developmental progress of their child.
- b. For school-aged children, # and % of parents who have at least two parent–teacher conversations about their student’s academic progress during the school year.
- c. # and % of students that report having an adult mentor (e.g. a family member, teacher, or community volunteer) who guides their development and educational progress.

II. Include student results and indicators related to arts and humanities. Since arts and humanities are one of eight priority areas, we suggest that a new student result (and new corresponding indicators) address this topic. For example:

1. RESULT: Students experience and participate actively in the arts and humanities.

INDICATORS:

- a. # and % of schools that offer arts and humanities programs.
- b. # and % of students that attend music, theater, dance and visual arts events.
- c. # and % of students that participate in community-based and/or school-based music, theater, dance and visual arts programs.

III. Include student results that focus on skills that students will need to succeed in a 21st century global economy and society. These include problem-solving, critical thinking, communication, creativity, collaboration, self-directed learning, a mindset of continuous improvement, and ability to make ethical and moral judgments. Access to 21st century learning tools—through home, school, and community—is a means for students to develop these important skills, not simply an end result, as currently listed in Table 2. We suggest replacing the existing result, “Students have access to 21st century learning tools,” and its corresponding indicators, with the following:

1. RESULT: Students possess the skills for lifelong learning and productive citizenship.

INDICATORS:

- a. **# and % of students that collaborate with peers for school and/or out-of-school time projects (peer-to-peer learning).**
- b. **# and % of students in sixth through twelfth grades that create and track their learning goals.**
- c. **# and % of students that use digital media for learning and educational enrichment.**
- d. **# and % of students that know how to access books, articles, and information from multiple sources (libraries, internet).**
- e. **# and % of children who participate in high-quality structured learning activities during out-of-school hours or in the hours before and after the traditional school day, including summer programs, at least three times per week.**
- f. **# and % of students that participate in volunteer and community service activities in their neighborhood or in a neighborhood of need.**

Proposed Definitions

Family Engagement in Education

The FSCE Working Group strongly recommends the inclusion of the below definition of “family engagement in education:”

Family engagement in education comprises all that families do to support their children’s learning and development, thus sharing responsibility with educators. It entails enrichment of a child’s development through early education programs, guidance through a complex school system, advocacy for more and improved learning opportunities, and collaboration with educators and community organizations to achieve more effective learning and healthy development. Ensuring that all parents and families are able to do this 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. Family engagement is continuous across a child’s life, spanning from Early Head Start programs to college preparation high schools, and is carried out everywhere that children learn – at home, in pre-kindergarten and early learning programs, in school, in after-school programs, in faith-based institutions, and in community programs and activities.

Education Programs

The FSCE Working Group recommends the inclusion of an additional requirement for preschool through 12th grade education programs as defined in the notice. Based on the proven effectiveness of family engagement in education reform efforts, we recommend the addition of the below language, to be designated as (d)(2), thus re-designating the following criteria as (e)(2):

“(d) Must include strategies, practices, policies, or programs that foster family-school partnership and family engagement in education (as defined in this notice);”

Family and Community Supports

The Working Group strongly suggests this definition be accompanied by the above-suggested definition of “family engagement in education” to both emphasize the importance of partnering with parents to improve academic achievement, and also to clearly communicate that the provision of direct services to parents and families is not tantamount to meaningful

engagement. Taken alone, we worry that the inclusion of “family and community supports” as defined communicates the wrong message to program applicants and grantees.

Neighborhood Assets

We believe this to be a missed opportunity to both encourage applicants to leverage the often untapped resources and expertise of parents and families and reinforce the need for partnership with parents and families in achieving academic success. We encourage the department to reexamine the definition of social assets and consider the inclusion of parents and families.

School Climate Needs Assessment

We reiterate the importance of partnership amongst all stakeholders, and believe that all points of view are integral when planning or implementing Promise Neighborhood programs. Therefore, we recommend that the definition be strengthened to represent the necessity of collecting views of students, school personnel, parents and families, and the community:

*“School climate needs assessment means **1 or more** evaluation tool(s) that measure the extent to which the school setting promotes or inhibits academic performance by collecting perception data from **students, school staff, parents and families, and the community.**”*

The FSCE Working Group recognizes the ongoing efforts of the Administration to support effective family engagement in education. We appreciate the opportunity provided by the Secretary and the Department to provide feedback on the proposed priorities, requirements, definitions, and selection criteria for the Promise Neighborhoods program. Our leadership collaborative believes the Promise Neighborhood program to be a key opportunity to leverage systemic family engagement efforts to improve educational outcomes in our nation’s most underserved communities and schools. Please feel free to contact Heather Weiss at heather_weiss@harvard.edu or (617) 495-9108 or Jacque Minow at jminow@pta.org or (703) 518-1200 Ext. 3351, if further clarification on the comment is needed.

Sincerely,

The National Family, School, and Community Engagement Working Group