



Afterschool Alliance

AFTERSCHOOL FOR ALL

September 28, 2011

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

Dear Secretary Duncan:

On behalf of parents, students, afterschool providers and supporters from across the nation, I would like to register my concern on the Optional Flexibility waiver provision, included as part of the President's No Child Left Behind waiver announcement, that could fundamentally alter the purpose of the 21st Century Community Learning Center (21st CCLC) program by allowing these funds (Title IV, Part B of NCLB) to be used to add time to the school day without providing guidance on how such time would be used.

I was surprised that the Optional Flexibility provision was included as part of the Department's waiver package given that none of the state education agency letters posted on the Center for Education Policy's Waiver website requested relief from 21st CCLC, nor mentioned 21st CCLC at all. As you know, and according to a recent research brief by the Harvard Family Research project (HFRP), more than a decade of research evidence suggests that 21st CCLC funding can help quality afterschool programs to provide a wide array of high quality afterschool experiences for children and youth; work toward improving academic success; contribute to improved child well-being; and promote child health and wellness. It is critical these benefits are not negated by the proposed waiver.

In particular, I ask that the Department define "expanded learning time" as referenced in the waiver language to reflect the following points:

- Strong partnerships between schools and community-based/faith-based organizations should be required in the implementation of expanded learning time. In order to ensure that expanded learning time programs are high quality, creative and maximize the potential of each local community, strong partnerships that emphasize collaboration, communication and alignment between schools and community-based/faith-based organizations should be at the core of all 21st CCLC grants. Community organizations, faith-based organizations and school districts should all be permitted to be the lead applicants for all 21st CCLC grants.
- 21st CCLC should be used to enhance and complement—but not replicate—learning during the school day. Quality afterschool programs are at the forefront of innovation and reform when it comes to engaging children in their own learning. Many children who are prone to drop out of school cite boredom and lack of relevance as the reason they leave school. Quality expanded learning time opportunities supported by 21st CCLC should provide children and youth with hands on, student-centered learning that motivates and inspires them, whether that occurs during the expanded school day or in before school, afterschool and summer settings. These meaningful experiences, involving science, math, physical



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activity, music, arts and opportunities for service, complement but do not replicate the traditional school day.

- Local communities should be the decision makers regarding how to best use 21st CCLC funds. Neither the US Department of Education nor the SEAS shall give priority to any model, be it afterschool, before-school, summer learning, or expanded learning time.

Furthermore, local communities should have the flexibility in deciding how to implement expanded learning time and whether it is optional or mandatory for all students.

Additionally, I seek further clarification on the following issues concerning the Optional Flexibility waiver:

- In states that opt for the Optional Flexibility waiver, what impact will this have on current 21st CCLC grantees? Will current grantees be able to change the focus of their grant program away from a focus on non-school hours and instead focus on a longer school day?
- In states that opt for the Optional Flexibility waiver, will only new 21st CCLC state level competitions be impacted by the waiver language and what guidance will be provided to state education agencies regarding the new competitions?
- In states that opt for the Optional Flexibility waiver, will all other provisions of Title IV, Part B of NCLB continue to be in effect, including priority for grantees that represent school-community collaborative partnerships?
- How is the Department defining "Expanded Learning Time" as mentioned in the Optional Flexibility waiver?

Thank you for your attention to this matter. I look forward to working with your office to ensure that specific guidance and language accompanies the Optional Flexibility waiver on 21st CCLC to ensure that state education agencies that opt for this change to 21st CCLC are provided a clear definition of expanded learning time. Please do not hesitate to contact me for further information.

Sincerely,

Jodi Grant
Executive Director