



Afterschool Alliance

AFTERSCHOOL FOR ALL

October 12, 2011

Honorable Tom Harkin
United States Senate
Washington, DC 20510

Honorable Michael Enzi
United States Senate
Washington, DC 20510

Dear Chairman Harkin and Ranking Member Enzi:

Thank you for the opportunity to review your draft legislation reauthorizing the Elementary and Secondary Education Act (ESEA). I'm writing on behalf of parents, students, afterschool providers and supporters and stakeholders from across the nation representing the 8.5 million children in afterschool programs and the more than 18 million that would be in programs if more resources were available.

I appreciate your efforts to incorporate some of the key provisions of successful afterschool programs into your definition of expanded learning time, including partnerships with community-based organizations and opportunities for learning that complement rather than replicate learning that takes place during the traditional school day. Regrettably, I remain deeply concerned about several of the proposed changes to the 21st Century Community Learning Center (21st CCLC) initiative that appear in the draft bill.

Changes to the 21st CCLC initiative should not come at the expense of the important contributions that afterschool and summer learning programs make in helping youth succeed in school and in life. There are five primary areas of concern with the proposed changes to 21st CCLC:

- It is outside the intent of the 21st CCLC initiative to fund comprehensive whole school redesign. We remain concerned that the limited amount of funding available through 21st CCLC would be quickly depleted, and many, many fewer schools and communities will be able to offer engaged learning opportunities after school and summers to students who need and want them if whole scale school redesign and reform were funded through 21st CCLC. Alternate funding streams such as School Improvement Grants and Title I would be more appropriate for this use. Our understanding in conversations with Senate HELP Committee staff was that 21st CCLC funding would be limited to the portion of a redesigned, expanded school day that incorporated community-based partners and provided students with engaging, expanded learning opportunities that complement but do not replicate the



school day. We recommend removing the option of school redesign that begins on page 491, line 24 of the bill draft.

- As discussed with Senate HELP Committee Staff previously, it remains important that language be included in the bill that would limit the priorities to the ones currently in the language, preventing both state departments of education and the federal Department of Education from prioritizing one model (afterschool, summer, before-school, or expanded learning time) over another model. We don't need a one size fits all approach imposed on our local schools and communities that collaborate to provide greater opportunities to their young people to succeed.
- Family and parent engagement is another hallmark of quality afterschool programs that has contributed towards ten years of successful 21st CCLC programs nationwide. I am concerned about the removal of language throughout the bill that speaks to the importance of family and parent involvement and the needs of working families, as well as removal of the purpose area that allows 21st CCLC to provide needed services and programs to the parents of the children served.
- While a large body of evaluation and research demonstrates the value of the existing 21st CCLC programs, there are improvements that the afterschool field would like to see incorporated into 21st CCLC. Many of these were included in the Afterschool for America's Children Act, S. 1370, but were not included in the draft ESEA bill. One major concern, is grant length as it takes for programs to reach full implementation and have measurable outcome indicators.. Reducing the grant period will impose new paperwork requirements that will make attaining success even more challenging for all types of grantees. We would also like to see the inclusion of language around Science, Technology, Engineering, and Math (STEM) education as well as physical activity and nutrition education, which would strengthen existing programs.
- Current 21st CCLC grantees continue to provide engaged, meaningful learning to students in over 11,000 school and communities nationwide. It is vital that the proposed changes to 21st CCLC acknowledge that many grantees are in the middle of their grant cycles and should therefore be exempt from the proposed changes as 'covered programs'

Please find below specific comments on the legislation's proposed changes to Section 4105: the 21st Century Community Learning Center initiative that reflect these themes. Additionally, we have a suggested a change to the STEM title of the draft bill, which follows these comments:

Page 489 line 17: Removes purpose area that provides parents of students with literacy and adult ed. opportunities. This should be reinstated.

Page 489 lines 21/22 should read academic work that aligns with, supplements and complements but does not replicate or merely add time to the coursework of a traditional school day. More of the same will not lead to better learning or access to expanded opportunities that many of our young people need. Change to:



“(3) significantly increase the number of hours in a regular school day, week, or year in order to provide students with additional time for academic work [insert: “that aligns with, supplements and complements but does not replicate or merely add time to the coursework of a traditional school day,] and for additional subjects and enrichment activities that increase student achievement and engagement and helps more students move successfully from grade to grade and graduation; and

Page 490 lines 1 through 10: Adds new fourth paragraph on comprehensive school redesign that includes three topic areas. This section refers to whole scale school redesign and whole scale school reform and would completely alter the unique nature of 21st CCLC and make it interchangeable with SIG and other school reform funding streams. 21st CCLC should be used for supplemental and complementary learning not whole scale school reform and redesign. That would quickly eliminate funding for the other models. This change could dramatically reduce the number of schools and communities that will have access to 21st CCLC opportunities. There are many federal programs that already fund professional development, but it is appropriate and important to fund professional development for teachers and afterschool educators to work effectively and together to advance student grades, performance, attendance, behavior, etc. If this section stays in the bill, we suggest the following changes:

“(A) instruction in core academic subjects [insert: that is aligned with but does not replicate the instruction that students receive during the regular school day]

“(B) instruction in additional subjects and enrichment activities; and

“(C) teachers, [insert: afterschool educators,] and staff to collaborate, plan, and engage in professional development within and across grades and subjects.”; and

Page 491 – line 3, add back in “offer families of students served by community learning centers opportunities for literacy and related educational development.”

Page 491 –Section C – this entire section beginning on page 491 lines 24 and ending on 492 lines 22 should be eliminated. This section refers to whole scale school redesign and whole scale school reform and would completely alter the unique nature of 21st CCLC and make it interchangeable with School Improvement Grants and other school reform funding streams. 21st CCLC should be used for supplemental and complementary learning, not whole scale school reform and redesign. This allowable use would quickly eliminate funding for anything else and eliminate many schools and communities from participating even though they want and need 21st CCLC’s and significantly reduce the number of communities served by 21st CCLC. If it stays, we suggest the following changes:

Page 492 Line 7 through 22: (i)for academic work [insert: that is aligned with, but does not replicate the regular school day], and to support innovation in teaching, in order to improve the proficiency of participating students, particularly struggling students, in core academic subjects; “

(ii) to advance student learning for all students in all grades; Change to some/all in both places that reference all

(iii) for additional subjects and enrichment activities that contribute to a well-rounded education, which may include music and the arts, physical education, and experiential and work-based learning opportunities; and



“(iv) for teachers [insert: and expanded learning educators] to engage in collaboration and professional planning, within and across grades and subjects.”;

Page 492 – lines 23/24 Elimination of “covered programs” - This language should remain in the bill and the following additional language should be added: (2) COVERED PROGRAM- The term covered program' means a program for which —

(A) the Secretary made a grant under part B of title IV of No Child Left Behind(as such part was in effect on the day before the date of enactment of the this legislation);

Page 494: line 3: This needs to remain to ensure that current grantees are funded to continue their grants.

Page 496 line 20 section D – reducing the time line of the grant is problematic, as outlined above. Propose leaving current language and making it clear that programs can reapply for funds.

Page 498 lines 9-12 – add language that prohibits priority for (A) (B) or (C) Insert line 11: shall have the flexibility to apply, without priority, for funds to carry

Page 500 lines 3 and 4 add “help improve student attendance, grades in required courses, and other factors that are critical to students, moving successfully from grade to grade and onto high school graduation and remaining on track to college and career readiness such as completing homework on time, reducing misbehavior, staying engaged in learning”, Page 500 line 6 and 7: Keep subparagraph J: “(J) a demonstration that the eligible entity has experience, or promise of success, in providing educational and related activities that will complement and enhance the academic performance, achievement, and positive youth development of the students;”

Page 500 Line 6 and 7 – Keep subparagraph L on community notice: (L) an assurance that the community will be given notice of an intent to submit an application and that the application and any waiver request will be available for public review after submission of the application;

Page 501 lines 5-9 – Strike the reference to management teams.

Page 501 lines 14/15 do not eliminate the language that refers to the importance of family-school collaboration and the needs of working families – that is essential.

Page 501 lines 22-25 same concerns as page 496 and that programs need longer grants -

Page 505, lines 13 and 14: Add here two new sections – (13) and (14) on STEM and physical activity: (13) “programs that build skills in science, technology, engineering, and mathematics (referred to in this paragraph as ‘STEM’) and that foster innovation in learning by supporting non-traditional STEM education teaching methods.”

(14) programs that support a healthy, active lifestyle, including nutritional education and regular, structured physical activity programs;

Page 506 line 7 should read the average time in hours per week / hours per year added to provide expanded learning opportunities for students attending the before school, afterschool, summer learning program or through efforts to expand the school day.



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Page 506 line 9: There needs to be an addition here that measures whether the program has a positive impact on student attendance for those attending the program and by what magnitude, whether the program has an impact on improving and attaining passing grades in required subjects, as well as factors that help students move successfully from grade to grade and onto high school completion, such as homework completion, being engaged in learning), tardiness, absenteeism, suspension rates and overall student behavior. For example could add:

(4) Measures of student engagement such as rates of homework completion, on-time grade promotion, earning passing grades in required courses, tardiness, involvement in afterschool and summer learning activities and opportunities, positive attitudes toward learning, regular school day attendance, suspension rates and incidences of school disciplinary action among attendees

Add section that explicitly states that the federal government (and the states) cannot prioritize any one model over another.

Title IV, Part B – STEM section of ESEA draft bill

p. 459, line 12 – We ask that the ESEA language reflect the language in Senator Merkley’s STEM bill and this line be amended to include “out-of-school activities” after “non-profit competitions”

We look forward to continuing to work with you to ensure that the 21st CCLC initiative remains a valuable asset to communities, schools and students across the nation. By engaging students in their own education and providing an important complement to the school day – whether during an optional expanded school day, after school, before school, or during the summer, this program can continue to contribute toward all facets of student success.

Sincerely,

Jodi Grant
Executive Director