



July 28, 2016

Meredith Miller

U.S. Department of Education

400 Maryland Avenue SW., Room 3C106

Washington, DC 20202-2800

RE: Docket ED-2016-OESE-0032: Elementary and Secondary Education Act of 1965, As Amended By the Every Student Succeeds Act: Accountability and State Plans

Dear Ms. Miller,

Thank you for the opportunity to provide comments to the Department of Education on the proposed regulations for implementation of programs under Title I of the Every Student Succeeds Act (ESSA). The Afterschool Alliance is a non-profit organization that works to ensure that all children have access to quality afterschool and summer learning opportunities. Our network of more than 26,000 afterschool partners is increasing access to afterschool and summer learning opportunities for students nationwide and tapping community partners to provide engaging, hands-on activities that raise school attendance, academic achievement and graduation rates. Many afterschool providers work closely with schools and access Department funding streams such as 21st Century Community Learning Centers (21st CCLC) and Title I funds.

In general, we are supportive of the proposed regulations, in particular around needs assessments, the indicators of performance, stakeholder engagement, evidence and research base, flexibility for states to develop consolidated plans, and the timeline for implementation.

Needs assessments: The Title I regulations, as proposed, outline a process that provides many opportunities for collaboration between key stakeholders such as parents, students, and community based organizations. We are supportive of the emphasis on equity and the direction that states, districts and schools look at how resources are allocated among schools. Identifying which schools provide enrichment and engagement activities for students (and which do not) is an essential part in this process and in understanding equity generally. SEAs should explore partnerships with afterschool state networks and state child care offices that are already working on mapping access to afterschool programs across their states.

Research-based interventions: The proposed regulations adequately direct states and school districts on the creation of lists of evidence- and research-based interventions that support Title I goals and indicators. Because evidence is clear on the positive role of afterschool programs to increase student success in attendance, homework completion, and discipline reduction, we anticipate states thoughtfully considering adding these programs to their approved list of interventions. Furthermore, we recommend that the Department of Education point to this research base as an example of other research-based indicators that states can use.

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Consolidated state plans: We are supportive of the proposal to allow states to combine plans for Title I with plans or applications for other Titles (including Title IV part B for 21st Century Community Learning Centers) within the ESSA legislation as part of one overall or "consolidated" state plan.

State Report Cards: We respectfully suggest adding to the state report card requirements an additional component around how the local educational agency will use funds under Title I and elsewhere in ESSA to support activities that coordinate and integrate before-school and after-school programs, and summer school programs to promote student success and school improvement.

Well Rounded subjects: Additionally, we suggest that "the arts" be added into the list of Well-Rounded subjects as the ESSA law indicates, and request new non-regulatory guidance that outlines the ways federal funds can support arts education.

Finally, we look forward to the Department asking for feedback on any additional guidance or frequently asked questions memos on Title IV provisions including the 21st Century Community Learning Centers (21st CCLC). Thank you again for the opportunity to provide feedback.

Sincerely,

Jodi Grant

Executive Director

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