



Afterschool Alliance

AFTERSCHOOL FOR ALL

September 5, 2007

TO: Chairman George Miller
Ranking Member Buck McKeon

FR: Jodi Grant
Executive Director

RE: Recommended Changes to Title I Discussion Draft - Part J - Expanded Learning Time Demonstration Program

Thank you very much for the opportunity to provide feedback on the House Education and Labor Committee Discussion Draft of Title I. The comments below are specific to Part J, Expanded Learning Time Demonstration Program found on Pages 399 through 435 of the Discussion Draft.

Redesigning the school day is long overdue. It's a concept that has been discussed for decades and one that the Afterschool Alliance supports. We commend the Committee for tackling this important issue in the reauthorization of the Elementary and Secondary Education Act. There are, however, four overarching concerns, as well as specific suggested line edits, that we would like to bring to the Committee's attention.

I. Ongoing Need for Quality Afterschool Programs

Recent studies show that children and youth in quality afterschool programs are demonstrating measurable gains in both academics and social behavior, gains that are a result of exposure to exciting and varied learning conditions and leaders. Afterschool programs are literally changing lives and creating opportunities where they did not exist before. However, they are not reaching enough of our children. In communities today, 14.3 million children take care of themselves after the school day ends, including almost four million middle school students in grades six to eight. Extended day programs, when well implemented, may create another opportunity to turn unused or poorly used hours into learning opportunities.

II. Need for Partnership with Community-Based Organizations

Successfully extending the school day involves more than just adding time; it's making sure the additional time is used to meet the needs of children, families and communities. More time must include more diverse learning opportunities, more real-world experiences and relevance, more engagement, more connections to community groups, more interaction with caring adults and more opportunities to prepare for higher education and employment. Therefore, the Afterschool Alliance is concerned that the existing language in Part J tasks schools with the burden of filling longer hours by themselves when there are already many community partners, such as YMCAs, Boys and Girls Clubs and City Parks and Recreations Departments, who are eager to work in partnership with schools and local education agencies to provide



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enriching opportunities for students. In many cases, the staff of these organizations may also better reflect the youth and the communities being served. It is *essential* to involve community partners in planning for and providing enrichment activities in an extended day program.

III. Distribution of Funds

Additionally, we believe it is most appropriate for a demonstration program to be administered directly by the Federal government while the initiative's overall effectiveness is still unknown. We discourage the creation of both a Federal discretionary grant program and State administered grant programs. The State administered model directs a larger portion of available funds to administrative costs, requires significant capacity building at the state level and is more appropriate for use when the program has moved beyond the demonstration phase. We have included edits below for all of the grant options outlined in the draft, but we suggest that SEC. 1874. STATE EXPANDED LEARNING TIME AND SCHOOL REDESIGN INITIATIVE GRANTS be deleted in its entirety.

IV. Prioritization of Grant Funding

As part J in the Discussion Draft is currently written, the expanded learning initiative is not prioritized to those schools and communities in greatest need. As our line edits below indicate, we strongly believe that the schools NCLB is trying most to assist - those in need of improvement, corrective action or restructuring - should have priority in terms of funding. All other factors should be eliminated.

We respectfully recommend the following changes be made:

1. **Partnership.** Requiring that recipients of these funds be partnerships between local education agencies and other organizations in the community (afterschool programs, community-based organizations, parks and recreation departments, institutions of higher ed, etc.) would significantly strengthen the proposed demonstration program. Experience tells us that partnerships are essential to successfully engaging children and youth and expanding their learning opportunities through enrichment as well as academics. Specifically:
 - SEC. 1879. DEFINITIONS. Pages 431- 434. Currently there are two different definitions of an eligible entity included in this section. We recommend deleting the definition on page 431, lines 14-18 and replacing it with the definition found on pages 433, lines 17-25 continuing on page 434, lines 1-7.
 - Sec. 1871. PURPOSES. Page 399, line 14, delete "local education agencies" and replace with "partnerships among local education agencies and community-based organizations."
 - Sec. 1871. PURPOSES. Page 399, line 16, delete "schools" and replace with "initiatives."
 - Sec. 1871. PURPOSES. Page 400, line 20 add "and afterschool providers such as community-based organizations" after "teacher union representatives."



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- Sec. 1871. PURPOSES. Page 401, line 3 change to “(8) to create partnerships among schools, local education agencies, community-based organizations and institutions of higher learning to provide additional learning opportunities for children.”
- Sec. 1873 EXPANDED LEARNING TIME AND SCHOOL REDESIGN PLANNING GRANTS. (d) APPLICATION CONTENTS. Page 408, line 19 add a new “(13) “A description of how the eligible entity will work with other community resources, such as community-based organizations and afterschool providers, to ensure that additional time in school includes engaging, hands-on, relevant learning opportunities.”
- Sec. 1874. STATE EXPANDED LEARNING TIME AND SCHOOL REDESIGN INITIATIVE GRANTS, language throughout section needs to be changed from “local education agency” to “eligible entity” reflecting requirement of partnership. This includes:
 1. Page 410, line 22 - delete “local education agencies” and insert “eligible entity”
 2. Page 411, line 1 - delete “local education agency” and insert “eligible entity”
 3. Page 411, line 5 - delete “local education agencies” and insert “eligible entity”
 4. Page 411, line 21 - delete “local education agencies” and insert “eligible entity”
 5. Page 412, line 5 - delete “local education agencies” and insert “eligible entity”
 6. Page 412, line 11 - delete “local education agencies” and insert “eligible entity”
 7. Page 412, line 14 - delete “local education agencies” and insert “eligible entity”
 8. Page 412, line 20 - delete “local education agencies” and insert “eligible entity”
 9. Page 413, line 2 - delete “local education agency” and insert “eligible entity”
 10. Page 413, line 21, - add “and other expanded learning time stakeholders” following “local education agencies
 11. Page 414, line 13, - delete “local education agencies” and insert “eligible entity”
- Sec. 1874. STATE EXPANDED LEARNING TIME AND SCHOOL REDESIGN INITIATIVE GRANTS. Page 414, line 17, add new “(10) A description of how the State educational agency will encourage collaboration with community-based organizations to ensure more time in school is used for engaging, hands-on, relevant learning opportunities.”
- Sec. 1875. EXPANDED LEARNING TIME AND SCHOOL REDESIGN IMPLEMENTATION GRANTS. Language throughout section needs to be changed from “local education agency” to “eligible entity” reflecting requirement of partnership. This includes:
 1. Page 421, Line 5, delete “or a local education agency”



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2. Page 423, line 14 - delete "local education agency or participatory schools" and insert "eligible entity"
 3. Page 425, line 22, delete "local education agency" and insert "eligible entity"
- Sec. 1875. EXPANDED LEARNING TIME AND SCHOOL REDESIGN IMPLEMENTATION GRANTS. Page 422, line 24, add new "(8) an assurance that enrichment programs will be planned, implemented and taught in coordination with community partners and experts from outside the school"
 - Sec. 1875. EXPANDED LEARNING TIME AND SCHOOL REDESIGN IMPLEMENTATION GRANTS. Page 424, line 1, add new "(12) A description of how the eligible entity will work with other community resources, such as community-based organizations and afterschool providers, to ensure that additional time in school includes engaging, hands-on, relevant learning opportunities."
 - Sec. 1877. EXTERNAL EVALUATION. Page 429, line 11, add new "(G) how collaboration with community partners enhanced the enrichment offerings available to students"
2. **PRIORITIZATION OF GRANT APPLICATIONS.** As previously mentioned, we believe the criteria for prioritizing the use of these funds is problematic. Specifically:
- Sec. 1873 EXPANDED LEARNING TIME AND SCHOOL REDESIGN PLANNING GRANTS. (e) PRIORITY, Page 409, delete lines 4-10; lines 14-16; and lines 16 - 22. Maintain only Page 409, lines 11-13 - "(e)(2)(B) that are identified as being in need of improvement, corrective action or restructuring as defined in section 1116 of Title I;" as this is the most important and significant criteria that should be used to prioritize grants as it is the most obvious way to ensure that federal funds are reaching schools in most need of assistance.
 - Sec. 1874. STATE EXPANDED LEARNING TIME AND SCHOOL REDESIGN INITIATIVE GRANTS. (e) PRIORITY, Page 414, delete lines 21-25; Page 415, delete lines 1-3; and lines 7-20. Maintain only lines, Page 415, lines 4-6 - "(e)(2)(B) that are identified as being in need of improvement, corrective action or restructuring as defined in section 1116 of Title I;" per above rationale.
 - Sec. 1875. EXPANDED LEARNING TIME AND SCHOOL REDESIGN IMPLEMENTATION GRANTS. (d) PRIORITY, Page 424, delete lines 21-24; Page 425, lines 1-3; and lines 7-16. Maintain only lines, Page 425, lines 4-6, "(d)(2)(B) that are identified as being in need of improvement, corrective action or restructuring as defined in section 1116 of Title I;" per above rationale.

Lastly, we want to draw the committee's attention to the fact that this initiative has the potential to fracture the school and youth development communities. More time cannot be limited to "more of the same". Afterschool programs have been forging



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connections between schools and communities for decades and as a result children and youth in quality afterschool programs get the best that schools have to offer, complemented by the best assets of the youth development community. Together these partnerships are far greater than the sum of the parts. We feel strongly that an initiative that puts the schools solely in control of an extended day is not in the best interest of our nation's youth. We hope to work with the Committee to ensure that this proposal creates new opportunities to address the most pressing needs of our children in a manner that will further unite schools, community groups, corporate partners and our children and families.

Once again, thank you for the opportunity to comment on the draft legislation. Feel free to contact me or Erika Argersinger at 202-347-2030 or Ellin Nolan at 202-289-3900 with any questions regarding our recommendations.

Sincerely,

Jodi Grant
Executive Director