



August 13, 2009

Office of Elementary and Secondary Education  
U.S. Department of Education  
Room 3W329  
400 Maryland Avenue, SW  
Washington D. C. 20202

**Docket ID: ED-2009-OESE-0006**

**Attention: Race to the Top Comments from the Afterschool Alliance**

Dear Secretary Duncan:

Thank you for the opportunity to comment on the Department's July 2009 Federal Register Notice regarding the Race to the Top grant program established under the American Recovery and Reinvestment Act (ARRA). We strongly commend the Department for recognizing the need for a comprehensive approach to education that includes expanded learning, afterschool and summer opportunities, and draws on community partnerships and cross-sector collaboration.

The Afterschool Alliance is working to ensure that all children, especially at-risk and struggling learners, have access to quality afterschool and summer opportunities. Our network of more than 26,000 afterschool partners is expanding learning opportunities for students nationwide and tapping community partners to provide engaging, hands-on activities that raise school attendance, graduation rates and overall school success. As such we respectfully submit the following six comments in response to the proposed guidance:

**1. Proposed Priority 3 - Invitational Priority – Expansion and Adaptation of Statewide Longitudinal Data Systems (page 37806).** In data systems, include expanded learning programs, such as afterschool, before school, and summer learning programs in the list of elements to be tracked. Expanded learning activities are included as a strategy for turning around struggling schools and are proven effective to improve attendance, academics, and graduation rates. As a key part of reform efforts, these programs should be included in data systems to inform continuous improvement. Including such data and sharing it with afterschool and community-based organizations will help paint a more comprehensive picture of the student's experience, both during the school day as well as after school, contribute to program evaluation, help track existing supports used for improving academic performance and identify gaps in supports –all of which could be used to help improve student performance.

**2. Proposed Priority 4 - Invitational Priority - P-20 Coordination and Vertical Alignment (page 37806).** Placing priority on vertical alignment is commendable. However, youth-serving community-based organizations (CBOs) should also be included in the organizations needed to create a seamless system. Youth-serving CBOs are part of the lifelong learning process and often address the needs of the most challenging students; keeping them engaged in school and learning, connecting them to their communities, and helping them stay in school and graduate. They are a critical component of a seamless P-20 system.

Under Proposed Priority 4, after “postsecondary institutions” add **“youth-serving community-based organizations.”**

**3. Proposed Priority 5 - Invitational Priority -- School-Level Conditions for Reform and Innovation (page 37806).** In addition to encouraging flexibilities and autonomies conducive to reform and innovation at the local level, states should be asked to address barriers that inhibit innovative approaches to supporting students through afterschool and summer programs. This could include such items as the use of space and buildings for afterschool and summer programs and coordination of funding streams such as those tied to Title I, 21<sup>st</sup> Century Community Learning Centers and Supplemental Educational Services to maximize impact and efficiencies.

Under Priority 5, change it from an invitational priority to a **competitive priority**. In addition, under (ii) after “expand learning time” add **“including use of space and building, and coordination of funding streams.”**

**4. Assurance Area Three: Great Teachers and Leaders – State Reform Conditions Criteria (page 37809).** Under section (C)(5), states are encouraged to create a high-quality plan to use rapid-time data to inform and guide support for teachers and principals. We applaud this goal; however, it is a missed opportunity not to include those who teach, support and engage students outside of the traditional school day in any professional development or other support services. Students should have access to engaging opportunities throughout the continuum of their learning day. Individuals working with students outside of the school day, such as youth development professionals also need professional support and training in order to effectively align their services with classroom goals and activities, and to improve results.

Under (C) (5), after “provided to” **strike “teachers and principals” and insert “teachers, principals, and individuals working with students outside of the school day, such as youth development professionals.”**

**5. Assurance Area Four: Turning Around Struggling Schools - State Reform Conditions Criteria (page 37810).** Under (D) (3) the proposed application criteria mentions that states should have the ability to support the Local Educational Agencies (LEAs) with persistently lowest-performing schools or the lowest-achieving schools by “...providing the school with flexibilities such as the ability to select staff, control its budget, and expand student learning time.” The same section goes on to describe additional strategies that might be used, including extended learning time and community-oriented support as well as time for enrichment activities and mechanisms for family and community engagement. This section can be strengthened by clarifying that “extended learning time” means “innovative and effective approaches including implementing afterschool, before school and/or summer learning programs and/or lengthening the school day, week or year.” Extended learning time should go beyond lengthening the school day to incorporate the lessons learned by the afterschool field and perhaps could be more accurately worded as ‘expanded learning time.’ Specifically, afterschool programs are most successful when they are built around the needs and interests of students and include curriculum to help build social, behavioral and professional skills; provide homework help and academic support; draw on community partners and resources; offer hands-on and creative activities; and give students the chance to explore new interests through service-learning.

To encourage participation by community partners and families, the application should elaborate on the current language “on-going mechanisms for family and community engagement” to say, “on-going mechanisms for family and community engagement, including participation in the development and implementation of reform plans, leveraging community support, providing enrichment services and coordinating with law enforcement.” Central to innovation should be partnerships, like afterschool programs and community schools, where programs leverage a host of resources including access to nutritious food, health care, physical activity, role models and mentors that help students achieve in and out of school. Innovation should include access to technology, community experts, and authentic learning experiences based in local community issues.

Under (IV), Definitions, add a definition of extended learning time (or preferably expanded learning time) as follows: **“innovative and effective approaches to providing more learning time for students including lengthening the school day, week or year and/or implementing afterschool, before school and/or summer learning programs.”**

Under (D)(3), fourth bullet, after “and ongoing mechanisms for family and community engagement” add **“ including decision-making participation in development, planning, and implementation of reform plans where community roles are critical, such as leveraging community support, providing enrichment services, and coordinating with law enforcement.”**

**6. Student Achievement (page 37811).** The definition of “Student Achievement” specifies at a minimum the performance measures that should be taken into account. Indicators like attendance and students being promoted to the next grade with their class should be added to “rates at which students are on track to graduate from high school,” in order to help provide a comprehensive indication of student achievement that can complement student scores on state tests.

Under the definition of student achievement, after “individualized education programs” add, **“attendance, on-time promotion of students.”**

Thank you for structuring the Race to the Top as an opportunity for the Department to encourage states and LEAs to work closely with community partners and afterschool program providers for the common purpose of achieving significant improvement in student outcomes. As you know, research indicates that youth who develop the kinds of skills afterschool and summer programs nurture, such as leadership, teamwork and conflict resolution, as well as character traits such as motivation and positive behavior, will do better in school and are likely to have more successful futures. Thank you for the opportunity to comment, please do not hesitate to contact the Afterschool Alliance at 202-347-2030 or [jgrant@afterschoolalliance.org](mailto:jgrant@afterschoolalliance.org) for further clarification of these comments.

Sincerely,



Jodi Grant  
Executive Director