



November 13, 2017

Ms. Jennifer Bell-Ellwanger
U.S. Department of Education
400 Maryland Avenue, SW, Room 6W231
Washington, DC 20202

Docket ID ED-2017-OS-0078

Dear Ms. Bell-Ellwanger:

On behalf of the America Forward Education Task Force, we thank you for the opportunity to provide comments on the Secretary's Proposed Supplemental Priorities and Definitions for Discretionary Grant Programs for the U.S. Department of Education, published in the Federal Register on October 12, 2017 (Docket ID ED-2017-OS-0078).

America Forward is the nonpartisan policy initiative of New Profit, a national nonprofit venture philanthropy fund that seeks to break down barriers between all people and opportunity in America. America Forward unites social entrepreneurs with policymakers and advance a public policy agenda that fosters innovation, rewards results, catalyzes cross-sector partnerships, and translates local impact into national change. We advance our efforts through the leadership of the **America Forward Coalition**, a network of more than 70 social innovation organizations that champion innovative, effective, and efficient solutions to our country's most pressing social problems. Our Coalition members are achieving measurable outcomes in more than 14,500 communities nationwide, touching the lives of 8 million Americans each year, and driving progress in education, workforce development, early learning, poverty alleviation, public health, Pay for Success, social innovation, national service, and criminal justice reform. Together, our Coalition organizations have leveraged \$1.5 billion for social innovation and have driven millions of federal resources toward programs that are achieving measurable results for those who need them most.

We appreciate the opportunity to provide feedback on the proposed priorities. While the America Forward Coalition was pleased to see that the proposed priorities include a general emphasis on innovation, we believe that there are areas where the Department can strengthen these priorities.

Recommendation 1: Promote partnerships with high-quality external partners.

We believe the Department should, wherever appropriate, promote and reward partnerships between public educational entities and high-quality external partners. In many instances, meeting the intent of the Department's proposed priorities requires the additional capacity in communities and schools that high-quality external partners bring. In certain instances, additional human capital will be required and national service should be considered as a cost-effective source of that person power.

Recommendation 2: Emphasize the critical importance of early learning by establishing a standalone priority focused on early learning and embedding these learning experiences across relevant Department-wide discretionary grant programs.

We believe that the draft priorities do not sufficiently prioritize and highlight the importance of early learning. For example, in Proposed Priority 7, there is a strong role for early interventions that build language and vocabulary. The language of Priority 7 must be strengthened and allow for organizations using an evidence-based model to prepare students for lifelong literacy gains. In Priority 8, there is an opportunity for supporting improved teaching and learning beginning in preschool and pre-Kindergarten, if states are interested and engaged through their plans under the Every Student Succeeds Act (ESSA). Priority 9 touches on kindergarten readiness only vaguely and only makes space for organizations that support families and communities, rather than schools and classrooms. We strongly urge the Department to ensure that these priorities chart a clearer path and intent to improve access to and the quality of early learning.

Recommendation 3: Promote the importance of personalized learning & technology by establishing new priorities dedicated to these essential components of the K-12 school system.

We believe that personalized learning, as well as leveraging technology to support instructional practices and professional development, are not sufficiently featured in the draft priorities. Both of these priorities are critical to ensuring that our nation's school system is setting students up for success in college and beyond. We hope that the Department will see personalized learning and leveraging technology to support instructional practices as essential components of the K-12 school system, and include both of these as standalone priorities in any final supplemental priorities for discretionary grant programs.

Recommendation 4: Within Proposed Priority 1—Empowering Families to Choose a High-Quality Education that Meets Their Child's Unique Needs, ensure that efforts to increase school choice options focus on models with a strong evidence base and do not divert federal funding to non-public entities.

While we support high-quality public charter schools that ensure high achievement for all students, including students with disabilities and other disadvantaged students, that break the mold of the status quo, and that create new solutions to meet critical needs, we oppose any and all efforts to divert federal funding to non-public entities that are not subject to the same accountability, transparency, civil rights and achievement standards. Therefore, we are troubled to see that the term “educational choice” within Proposed Priority 1 is defined to include private or home-based educational programs and other private education providers. We strongly suggest the elimination of subsection (2) within the definition of “educational choice.”

We are encouraged by the Secretary's inclusion of dual or concurrent enrollment and early college high schools as part of the definition of “educational choice” options within the Department's priorities for discretionary grant programs. These models provide students with course and school options so they can tailor their academic experience to their specific college and career plans. We urge the Department to include language about the need for these programs to include and effectively support students with disabilities and meet the requirements of federal special education law.

In addition, we recommend that the Department strengthen the language in (c) “developing, increasing access to, and building evidence of effectiveness of innovative models of educational choice” to ensure that greater priority is provided for models with a strong evidence base for improving student success. Numerous rigorous, multi-institution, federal, and statewide research studies in more than a dozen states have proven that early college high schools and dual and concurrent enrollment programs significantly increase high school graduation rates, college readiness, and college access, persistence, and completion. At the same time, these models lower the cost of college for families and reduce the time needed for students to complete degrees and enter the workforce. Across the country, these models are saving money for students, families, and taxpayers while improving efficiencies in transitions between high school and higher education. As a result, we believe that these models are suitable candidates for the Department’s priorities and demonstrate an evidence base sufficient to justify federal investment.

Recommendation 5: Under Proposed Priority 2—Promoting Innovation and Efficiency, Streamlining Education with an Increased Focus on Improving Student Outcomes, and Providing Increased Value to Students and Taxpayers, promote the usage of innovative models that build on prior investments and build on evidence already developed.

We are encouraged by the Secretary’s emphasis on innovation and building, as well as using evidence as priorities for use in discretionary grant programs. Under Proposed Priority 2, we recommend the Department include—either as an additional priority area or incorporated as a subpriority—references to models and resources already available and familiar to the education community when applying for discretionary grant funding. Given the Department’s history incentivizing innovation and using evidence-based models such as innovation funds and Pay for Success, the Department should encourage, and give preference points to, potential grantees that choose to implement a model that either: (a) is featured on the Institute of Education Science’s What Works Clearinghouse (WWC) and that meets WWC standards, (b) intends to implement an intervention that has been a part of a scale-up or validation grant under the Education Innovation Research grant program (formally the Investing in Innovation program), or (c) intends to use Pay for Success contracting.

By adding these priority areas, the Department would help to ensure that the innovation already supported and the evidence already built by state and local education programs is not isolated to those individual programs. The Department would also be promoting the efficient use of federal funding by signaling that evidence already developed should be used and built on, and that legislatively authorized approaches, such as Pay for Success, should be implemented.

Recommendation 6: Within Proposed Priority 3—Fostering Flexible and Affordable Paths to Obtaining Knowledge and Skills, ensure that any pathways to post-secondary education or the workforce do not limit a student’s opportunities after high school.

We recognize that each student has his or her own unique strengths and challenges, and we appreciate that Proposed Priority 3 would encourage projects that tailor a students’ education to meet their particular needs and interests through models such as competency-based learning. However, we caution against creating new pathways to post-secondary credentials or the workforce that do not meet the same rigorous standards that are required for a high school diploma. It is critical that any pathways to post-secondary education or the workforce must not limit a student’s opportunities after high school.



Standards that are below that of a regular high school diploma can and often do limit the opportunities for students with disabilities in higher education and the workforce.

Recommendation 7: Strengthen Proposed Priority 4—Fostering Knowledge and Promoting the Development of Skills that Prepare Students to be Informed, Thoughtful, and Productive Individuals and Citizens, to ensure that revitalizing effective civics education remains a priority.

We are pleased to see the inclusion of Proposed Priority 4 and urge the Department to strengthen this priority in the final version. It is crucial that this Priority, and particularly sub-priority (a) (foster knowledge of the common rights and responsibilities of American citizenship and civic participation, such as through civics education) remains a priority in an effort to revitalize effective civics education. Educating for citizenship is a foundational responsibility of American public schools. Yet, over the past decades, the amount of time allocated to, and the quality of, civics education in schools across the country have declined. There have been insufficient resources at the federal and state levels to ensure that our K-12 students are educated with an effective civics education that prepares them for lifelong participation and ultimately, secures the stability of our American democracy. This is a vital time for such an investment.

Recommendation 8: Strengthen Proposed Priority 5—Meeting the Unique Needs of Students and Children, including those with Disabilities and/or with Unique Gifts and Talents, to ensure that students with disabilities have access to and the supports and resources necessary to engage in high-quality educational opportunities.

We appreciate the Department's recognition in Proposed Priority 5 that students with disabilities have unique needs and must be provided equal access to a high-quality education that prepares them for the future. However, we do not believe potential grant applicants should receive additional points for addressing existing requirements, which are already required by our nation's civil rights laws, including the Americans with Disabilities Act and the Individuals with Disabilities Education Act (IDEA). We strongly suggest that the Department strengthen final Priority 5 to include language that acknowledges that students with disabilities must be given more than just access to educational opportunities, but also the supports and resources to meaningfully engage in those opportunities.

Recommendation 9: Within Proposed Priority 6—Promoting Science, Technology, Engineering, and Math (STEM) Education, With a Particular Focus on Computer Science, emphasize the need to expand access to these educational opportunities to students with disabilities.

We appreciate the focus within Proposed Priority 6 on the importance of increasing the number of educators prepared to instruct students in the STEM and computer science fields, as the shortage of teachers in these fields is troubling. However, we strongly encourage the Department to consider including an emphasis on preparing STEM and computer science educators to teach students with disabilities. Students with disabilities are significantly less likely to have access to high-quality STEM and computer science courses and are less likely to have the supports necessary to thrive in these courses. Students with disabilities should not be denied access to these opportunities, but should instead be provided the supports and accommodations they need to succeed and reach their full potential. Therefore, we strongly urge the Department to include a new subsection dedicated to supporting efforts

to expand access to STEM and computer science educational opportunities to students with disabilities and ensuring that they have access to technology and other appropriate accommodations as necessary.

Recommendation 10: Strengthen Proposed Priority 8—Promoting Effective Instruction in Classrooms and Schools to ensure that educators receive the training necessary to effectively teach in innovative settings and are equipped with the skills necessary to teach students with disabilities.

We recommend that the Administration strengthen Proposed Priority 8 by incorporating a priority area for projects that are designed to expand the pool of teachers who can effectively teach college courses in early college and dual or concurrent enrollment settings. Teacher preparation programs do not equip teacher candidates with the knowledge, skills, or experience for them to work effectively with students with disabilities. We strongly suggest that the Department update final Priority 8 to reflect the need for programs to promote effective instruction of students with disabilities.

Recommendation 11: Ensure that Proposed Priority 9—Promoting Economic Opportunity, is carefully crafted in light of the historical experience of students with disabilities.

While we recognize that not all students follow the same educational path to a high school diploma or to the workforce, we caution against setting different standards or alternative pathways for certain groups of students. Historically, students with disabilities have been placed on different trajectories than their peers without disabilities, often held to lower standards and not given the opportunity to graduate with the rigorous credentials needed to pursue meaningful college or career opportunities.

Recommendation 12: Strengthen Proposed Priority 10—Encouraging Improved School Climate and Safer and More Respectful Interactions in a Positive and Safe Educational Environment.

Proposed Priority 10 fails to acknowledge that certain school communities have a large percentage of students who have experienced trauma and require additional supports to meet their developmental needs. In addition, the Priority does not acknowledge that when the needs of students with disabilities go unmet or the aforementioned developmentally appropriate supports are not provided, it can lead to behavioral challenges in the classroom and a less safe and positive educational environment for all students. When addressing school climate and discipline issues, one must also look to how the school is supporting and meeting the needs of students and whether the school has the capacity in place to effectively meet those needs. Evidence-based strategies and frameworks such as Multi-tiered Systems of Support (MTSS) and positive behavioral interventions and supports (PBIS) can be effective tools in efforts to improve school climate and must be included in this Priority. There should also be recognition that additional capacity might be needed to effectively implement these evidence-based strategies and frameworks, requiring schools to collaborate with high quality partners using research-based tools, including those that leverage national service.

Recommendation 13: Within Proposed Priority 11—Ensuring that Service Members, Veterans, and Their Families Have Access to High-Quality Educational Choices, ensure that efforts to expand educational choices to military-connected children do not divert federal funding to non-public entities.



Similar to our concern under Proposed Priority 1, for Proposed Priority 11, we note our opposition to any and all efforts to divert federal funding to non-public entities that are not subject to the same accountability, transparency, civil rights and achievement standards.

Thank you for the opportunity to comment on the Secretary's Proposed Priorities and definitions for discretionary grant programs. We would be happy to provide clarification of any of the points raised or to provide any additional information you request. Please do not hesitate to contact Nicole Truhe, America Forward's Director of Government Affairs, at nicole_truhe@newprofit.org, if you would like to discuss our comments further.

Sincerely,

The America Forward Education Task Force