September 25, 2009

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

Dear Secretary Duncan:

The Coalition for Community Schools (CCS) is the nation’s largest alliance of organizations in education, youth development, health and mental health services, social and emotional learning, community development and related fields, comprising more than 150 organizations. The Coalition advances opportunities for the success of children and youth, as well as their families and communities by promoting the development of more, and more effective community schools.

Our comments on the School Improvement Guidelines (SIG) guidelines are grounded in research-based principles that drive the work of the Coalition and that reflect the vision of schools as centers of community or community schools as you have articulated:

• Communities and schools are fundamentally and positively interconnected.
• Schools can make a difference in the lives of all children.
• Children do better when their families do better.
• The development of the whole child is a critical factor for student success.

We are pleased that elements of the vision of community schools are referenced in the SIG, however, most of our partners were unfamiliar with and confused by the term community-oriented schools. This and other areas of the SIG can be clarified to help SEA, LEA and community leaders more fully understand this vision and incorporate it into their proposals to improve our nation’s lowest performing schools. The following points drive our comments:

1. **Consistent Language**: We support common language and seek consistency among terms and definitions across the major reform programs of the Department of Education including RTT, Title I and SIG. This will ensure alignment across DOE funding streams and facilitate attainment of the Department’s goals.

2. **Equal Access to Opportunity**: The SIG should ensure that all reform models provide students with equal access to opportunities to succeed. These opportunities should be consistently required across all the reform models.
3. Mobilizing and Organizing Community Assets: Community agencies and institutions possess assets and expertise that are essential to the success of struggling schools. Therefore, the SIG should expect schools to demonstrate how they will mobilize community resources and organize these resources to support student success.

4. Alignment and Coordination: The SIG should clearly state the Department of Education’s expectations for SEAs, LEAs and individual schools to align and coordinate the academic, social and emotional development, extended and expanded learning, and other opportunities and services available to students. This expectation should be elevated in priority because alignment and coordination are vital if the school, its community partners and its various programs are serious about improving results for students.

Specific Comments

Our comments focus on the section beginning on Pages 43108 and 43109 of the Federal Register. I. SEA Priorities in Awarding School Improvement Grants; A. Defining Key Terms; 2. Strongest Commitment

We provide suggested edits to the draft guidelines in BOLD red; strike-through proposed deletions; and a rationale in italics for each proposed change.

2. Strongest Commitment. An LEA with the strongest commitment is an LEA that agrees to implement and demonstrate the capacity and the community support to implement fully and effectively one of the following rigorous interventions in each Tier I and Tier II school that the LEA commits to serve:

Rationale: Research shows that one of the important reasons why efforts to improve low performing schools fail is lack of community support. LEAs should be expected to demonstrate planned community support for the reform models they have chosen in their application.

a. Turnaround model. A turnaround model must include--

   (v) Providing ongoing, high-quality, job-embedded professional development to staff to ensure that they are equipped to facilitate effective teaching and learning (e.g., subject-specific pedagogy, instruction that reflects a deeper understanding of the community served by the school, or differentiated instruction).

Rationale: The examples of types of professional development suggested for the Transformation Model should be included for Turnarounds as well. Of particular importance is the focus on “instruction that reflects a deeper understanding of the community served by the school.” Research shows a major gap between life and learning for students in low performing schools; thus, instruction with deeper connections to community, done from a community problem solving perspective is more engaging and likely to improve student achievement.

   (vi) Promoting the continuous use of student data (such as from formative, interim, and summative assessments) to inform and differentiate instruction to meet the needs of individual students as well as

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data on non-academic factors influencing student achievement, e.g., attendance, early chronic absenteeism, truancy, health, dental, vision, hearing, immunizations, safety, family engagement and well-being and student civic engagement;

**Rationale:** Non-academic factors have a direct impact on student achievement.\(^3,4,5\) The Department of Education recognizes this in the Race to the Top Guidelines where it suggests that state data systems should address factors such as early childhood and health. Turnaround schools should also be expected to take these factors into consideration and, together with community partners, develop strategies to address them.

(vii) Establishing schedules and strategies that increase instructional time for students, **including extended (or expanded) learning opportunities through partnerships** with community-based organizations, institutions of higher education and others; and time for collaboration and professional development for staff; and

**Rationale:** Efforts to increase instructional time should explicitly recognize the evidence that extended and expanded learning opportunities deeply integrated with the school curriculum and provided through partnerships provide enriched learning opportunities that increase student achievement. SEAs and LEAs that cultivate these partnerships tap into and leverage the assets and funding streams of partners.

(viii) Providing appropriate social-emotional services and supports, **social and emotional learning opportunities and comprehensive community-based services** in and organizing community schools.

**Rationale:** The term social and emotional is typically associated with learning\(^6\) - not only services and supports. We propose that social and emotional learning be included here.

The term **community-oriented services and supports** is rarely, if ever used and may confuse SEAs and LEAs. The term **comprehensive community based services** is more common. Tying those services to the community school strategy outlined in the recently issued Title I Uses Guidelines under ARRA would provide more consistency in the guidelines and encourage SEAs and LEAs to align these resources. See Title I definition below.

| A community school is both a place and a set of partnerships between the school and other community resources. It provides academics, health and social services, youth and community development, and community engagement, and brings together many partners to offer a range of support and opportunities for children, youth, families, and communities. The school is generally open for extended hours for everyone in the community. Source: Using Title I, Part A ARRA Funds for Grants to Local Education Agencies to Strengthen Education, Drive Reform, and Improve Results for Students. (September 2, 2009). U.S. Department of Education, Office of Elementary and Secondary Education. http://www.ed.gov/policy/gen/leg/recovre/y/guidance/titlei-reform.pdf; |


\(^6\) See the work of the Collaborative for Academic, Social and Emotional Learning for more information. www.casel.org
ADD NEW: (ix) Providing ongoing mechanisms for family and community engagement

Rationale: Research is clear on the link between family involvement and student achievement\(^7\). The Title I law requires family involvement. Turnaround schools should be expected to have a plan for working with community partners to support student achievement. Definitions of both these terms should be included in the Guidelines. We suggest the definitions (below) that we proposed to the Department of Education for the RTT guidelines.

**Community Engagement** means systematic efforts to involve, engage and collaborate with parents, community residents, members of school communities, community partners and other stakeholders in exploring the needs of their students and schools, developing a plan, and working together to address the needs. Effective community engagement is an ongoing process to develop a welcoming school and school system and mobilize the community’s assets to support student achievement and growth.

**Family engagement** means the process of engaging families in meaningful ways and assisting them to actively support their children’s learning and development. Family engagement is a shared responsibility of families, schools and community-based organizations. This shared responsibility is continuous from birth through young adulthood and reinforces learning that takes place in the home, school, and community.

ADD NEW: (x) Laying out a clear school improvement plan for how the various elements of the turnaround strategy will be aligned and coordinated to improve student achievement and other indicators of student growth and development.

Rationale: Alignment and coordination of resources are vital in any school improvement process. The Department of Education should make that expectation explicit. Moreover the guidelines should use the same definition of student growth that is included in the RTT guidelines as we have proposed here. Those guidelines go beyond academic achievement to include other factors (e.g. health and civic competencies).

b. **Restart model.** A restart model is one in which an LEA closes a school and reopens it under a charter school operator, a charter management organization (CMO), or an education management organization (EMO) that has been selected through a rigorous review process. A restart model must admit, within the grades it serves, all former students who wish to attend the school. The organization responsible for the restart must demonstrate how it will provide the range of academic and other opportunities specified for Turnaround and Transformational Schools, e.g., extended and expanded learning opportunities, social and emotional learning and community-based services.

Rationale: All schools, regardless of who operates them, should offer the range of services, supports and opportunities that the Department expects of turnaround and transformational schools. The students in their schools need as much support as can possibly be organized on their behalf.

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c. **School closure.** An LEA closes a school and enrolls the students who attended that school in other, high-achieving schools in the LEA, which may include charter schools.

d. **Transformation model.** A transformation model must include each of the following strategies:

(i) Developing teacher and school leader effectiveness.

(A) **Required activities.** The LEA must--

(4) Provide staff ongoing, high-quality, job-embedded professional development (e.g., regarding subject-specific pedagogy, instruction that reflects a deeper understanding of the community served by the school, or differentiated instruction or working effectively with families and community partners) that is aligned with the school's comprehensive instructional program and designed to ensure staff are equipped to facilitate effective teaching and learning and have the capacity to successfully implement school reform strategies; and

**Rationale:** If schools are to tap the assets of families to support student achievement and community partners to organize community schools, provide extended and expanded learning opportunities and social and emotional learning opportunities and other services, principals and teachers must be better informed about how to work with them.

(ii) Comprehensive instructional reform strategies.

(A) **Required activities.** The LEA must--

**ADD NEW:** (3) Use data on non-academic factors influencing student achievement (e.g., attendance, early chronic absenteeism, truancy, health (vision, hearing, immunizations, dental, mental health), safety, family engagement and well-being, and student civic engagement), together with community partners develop strategies to address these factors;

**Rationale:** Non-academic factors have a direct impact on student achievement.8,9,10 The Department of Education recognizes this in the Race to the Top Guidelines where it suggests that state data systems should address factors such as early childhood and health. Transformational schools should be expected to take these factors into consideration and together with community partners develop strategies to address them.

(B) **Permissible activities.** An LEA may also implement other strategies for implementing comprehensive instructional reform strategies, such as--

(3) In secondary schools--

**ADD NEW:** (d) Providing students with engaging learning opportunities that reflect the context of the community in which the school is located. This might include service learning, place-based education, civic or environmental education.

**Rationale:** Student engagement is a major barrier to achievement.11 The types of learning experiences we propose have been proven to have a positive impact on student achievement. If they are not required, we fear that in the present testing environment, schools will overlook the importance of

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engagement and emphasize only core academic instruction. We know from experience that it is possible to use these engaging learning methods to help students learn core content.

(iii) Extending learning time and creating community-oriented schools.

Rationale: The term community-oriented schools is unfamiliar and will be confusing to the field. Community schools (also synonymous with community learning centers and community-based comprehensive services) is more commonly known, and is now a part of the Department of Education’s lexicon – having been included as an allowable use in the recently issued Title I guidelines (See Title I definition on page 4). Community schools encompass the range of opportunities and services described in this section. We ask the Department of Education to drop the word “oriented” and use “community schools.”

(A) Required activities. The LEA must--

(3) Provide more time or opportunities for enrichment activities for students (e.g., instruction in financial literacy, internships or apprenticeships, service-learning opportunities) by partnering, as appropriate, with other organizations, such as universities, higher-education institutions, community-based organizations, businesses, and museums; and

Rationale: Higher-education institutions is a broader term, encompassing community colleges, colleges, and universities.

ADD NEW: (5) Partner with parents, faith- and community-based organizations, higher-education institutions, health clinics, the police department, and others to create safe school environments that meet students’ social, emotional and health needs.

Rationale: Community-based organizations are providing many of these services in schools and should be included. For many students success in school requires addressing their social, emotional and health needs. This should be a required element of transformation. The beginning of a school improvement process is the ideal time to invite community partners to step forward and partner with educators to meet these needs. Therefore, we have moved Subsection (1) from the “Permissible” to the “Required” category.

(B) Permissible activities. An LEA may also implement other strategies that extend learning time and create community-oriented schools, such as--

(1) Partnering with parents, faith- and community-based organizations, health clinics, the police department, and others to create safe school environments that meet students’ social, emotional and health needs;

(iv) Providing operating flexibility and sustained support.

(A) Required activities. The LEA must--

(2) Ensure that the school receives ongoing, intensive technical assistance and related support from the LEA, the SEA, or a designated external lead partner organization (such as a school turnaround organization or an EMO or other capacity-building organization).


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School Improvement Grant

Rationale: In many communities other institutions such as cities, counties, United Ways and other nonprofit organizations are providing support to school districts to provide extended and expanded learning opportunities and developing community schools. They should be referenced as resources for technical assistance to schools.

ADD NEW: (3) LEA must ensure that the school improvement plan shows how the various elements of the transformational strategy will be aligned and coordinated to improve student achievement and other indicators of student growth.

Rationale: Alignment and coordination of resources is vital in any school improvement process. The Department of Education should make that expectation clear. Moreover, the guidelines should use the same definition of student growth that is included in the RTT guidelines as we have proposed. Those guidelines go beyond academic achievement to include other factors such as health and civic competencies.

Conclusion
These School Improvement Guidelines and other ARRA guidelines will set the foundation for reform of our nation’s neediest schools in the coming years. We trust that our comments will help the Department of Education ensure that these guidelines encourage deep intentional relationships between school and community partners. We are available for further consultation upon request.

Sincerely,

Ira Harkavy
Chair, Coalition for Community Schools Steering Committee

Martin J. Blank
President, Institute for Educational Leadership; Director, Coalition for Community Schools

Lisa Villarreal
Co-Chair, Coalition for Community Schools Steering Committee

Coalition for Community Schools at the Institute for Educational Leadership
www.communityschools.org
www.iel.org
The Coalition for Community Schools Partners

**EDUCATION**
- American Association of School Administrators
- American Federation of Teachers
- American School Counselor Association
- ASCD
- Campaign for Educational Equity at Teachers College
- Collaborative for Academic, Social and Emotional Learning
- Center for Social and Emotional Education
- Developmental Studies Center
- Expeditionary Learning
- Little Tennessee Valley Educational Cooperative
- National Association for Bilingual Education
- National Association of Elementary School Principals
- National Association of School Psychologists
- National Association of Secondary School Principals
- National Association of State Boards of Education
- National Association of State Directors of Special Education
- National Center for Learning and Citizenship
- National Education Association
- National PTA
- National School Board Association
- National Service Learning Partnership
- National-Louis University
- Pacific Oaks College
- The Campaign for Educational Equity at Teacher's College

**HEALTH & MENTAL HEALTH CONT’D**
- National Mental Health Association
- Society of State Directors of Health, Physical Education and Recreation
- UCLA Center for Mental Health in Schools (CA)

**NATIONAL COMMUNITY SCHOOL NETWORKS**
- Children's Aid Society
- Communities in Schools, Inc.
- Children's Aid Society
- National Community Education Association
- School of the 21st Century - Yale University
- University of Pennsylvania-Center for Community Partnerships

**SCHOOL FACILITIES PLANNING**
- 21st Century School Fund
- Concordia, LLC
- Council of Education Facilities Planners International
- National Clearinghouse for Educational Facilities
- New Schools / Better Neighborhoods
- Smart Growth America

**POLICY, TRAINING, & ADVOCACY**
- American Youth Policy Forum
- Annenberg Institute for School Reform
- Child and Family Policy Center
- Children's Defense Fund
- Education Development Center
- Family Friendly Schools
- First Focus
- Foundations, Inc
- Institute for Educational Leadership
- National AfterSchool Association
- National Child Labor Committee
- National Coalition for Parent Involvement in Education
- Poverty and Race Research Action Council
- Public Education Network
- Rural School and Community Trust
- The Finance Project

**YOUTH DEVELOPMENT**
- Academy for Educational Development
- Afterschool Alliance
- After-School All-Stars
- America's Promise -- The Alliance for Youth
- Big Brothers Big Sisters of America
- Boys & Girls Clubs of America
- Camp Fire USA
- Center for Collaborative Solutions

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Coalition for Community Schools at the Institute for Educational Leadership

www.communityschools.org
www.iel.org
YOUTH DEVELOPMENT CONT’D
Community Collaborations and Initiatives Specialist
Forum for Youth Investment
Innovation Center
National Institute on Out-of-School Time
National Youth Employment Coalition
PASE -Partnership for After-School Education
The After School Institute
The After-School Corporation
YMCA of the USA
Youth Development Institute (NY)

COMMUNITY BUILDING
Asset-Based Community Development Institute
Center for Community Change
Community Building Institute
Development Training Institute
Harwood Institute
National Council of La Raza
National Trust for Historic Preservation
National Urban League
Police Executive Research Forum

STATE ENTITIES
Association of New York State Youth Bureaus
California After School Network
Colorado Partnership for Families and Children
Community Schools Rhode Island
Education Leadership Beyond Excellence
Illinois Federation for Community Schools
Kentucky Division of Family Resource and Youth Services Centers
Nebraska Children and Families Foundation
New Jersey Department of Human Services
Ohio Family and Child First Councils
State Education and Environment Roundtable
United Way of Rhode Island
Voices for Illinois Children
Washington State Readiness-to-Learn Initiative

LOCAL COMMUNITY SCHOOL NETWORKS
Achievement Plus (MN)
Bates College
Bay Area Partnership for Children and Youth
Birmingham Public Schools
Boston College
Boston Full Service Roundtable

LOCAL COMMUNITY SCHOOL NETWORKS CONT’D
Bridges to Success
Chelsea Community Schools
Chicago Public Schools
City of Albuquerque-Albuquerque Bernalillo County Community Schools Partnership
Community College of Aurora (CO)
Chicago Public Schools-Office of After School and Community School Programs
Evansville Vanderburgh School Corporation
Jacksonville Children's Commission
John W. Gardner Center for Youth and Their Communities
Kent County School Services Network (MI)
Lincoln Community Learning Centers (NE)
Linkages to Learning (MD)
Local Investment Commission, Kansas City, MO
Los Angeles Education Partnership
Mesa United Way
Minneapolis Beacons Project
Rockland 21C (NY)
Rockland County Youth Bureau (NY)
School & Community Network (PA)
SCOPE / Community School Initiative
St. Louis Public Schools
Strategic Alternatives
SUN Community Schools, Multnomah County (OR)
Tennessee Consortium for the Development of Full Service Schools
Tukwila Community Schools Collaboration (WA)
Tulsa Area Community School Initiative
United Way of Buffalo & Erie County
United Way of Central Indiana
United Way of Genesee County
United Way of Greater Greensboro
United Way of Greater High Point
United Way of Southeastern Pennsylvania
United Way of the Greater Lehigh Valley
University of Dayton, Dayton Public Schools, OH
University of Alabama
University of Denver
University of Kansas
University of New Mexico/United South Broadway Corporation
University of Rhode Island
University of South Carolina, Afterschool and Community Learning
National Resource Network
YMCA of Greater Long Beach Downtown

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www.communityschools.org
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