



May 24, 2016

Dr. John B King, Jr.  
Secretary of Education  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington D. C. 20202

**RE: Implementing Programs under Title IV, Part B of the Elementary and Secondary Education Act**

Dear Secretary King,

Thank you for the work being done by the Department of Education (ED) to implement the *Every Student Succeeds Act* (ESSA) in a timely and efficient manner. On behalf of the Afterschool Alliance, I am writing to provide input on Title IV, Part B of ESSA, the 21<sup>st</sup> Century Community Learning Centers (21<sup>st</sup> CCLC) initiative. This input is based on conversations that Afterschool Alliance staff have had with dozens of states and afterschool providers over the last six months

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 22,000 afterschool partners includes state education agencies, local education agencies, community partners, afterschool intermediaries and city leaders. We are committed to 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.

The Afterschool Alliance supports the changes made to 21<sup>st</sup> Century Community Learning Centers (21<sup>st</sup> CCLC) as part of ESSA. These changes have the potential to strengthen the program and result in positive outcomes for hundreds of thousands of young people. At the same time we believe that ED can help to clarify several of the components of the new law and assist state education agencies (SEAs) and local eligible entities in understanding and maximizing the opportunities within the newly reauthorized 21<sup>st</sup> CCLC.

Of primary concern to us of the below are:

- Sec. 4201 (b) 4: External Organizations
- Sec. 4203 (a) 3 A: Eligible entities
- Sec. 4203 (a) 14: Performance measures
- Sec. 4204 (a)2: Expanded Learning Program Activities

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Please find details of all of our concerns below:

- Sec. 4201 (b) 4: External Organizations
  - External Organizations: we have received a great deal of feedback from the field regarding provider and SEA uncertainty as to what is meant by the term “external organizations”.
    - The intent of the “external organizations” in Title IV, was to make it easier for city level or regional level intermediaries and/or statewide afterschool networks with capacity, expertise and experience to assist programs and grant recipients with technical assistance, capacity building and training on implementation of specific aspects of their grants including quality improvement, staff professional development, parent engagement and other needed supports.
    - We recommend that each 21<sup>st</sup> CCLC office within an SEA determine a prescreened list of these external organizations available for 21<sup>st</sup> CCLC grantees to work with to improve program quality.
    - In areas where networks or intermediaries do not exist, well-resourced providers could serve this role and be included on the pre-screened list.
    - Some SEAs are confused about the requirement for pre-screening external organizations verse pre-screening for applicants. It should be clarified that applicants for 21<sup>st</sup> CCLC grants do not need to be pre-screened.
  - Based on conversations with SEAs, we believe it is important for ED to clarify that SEAs can use funds from the set aside for technical assistance and training (which was increased from 3 percent to 5 percent in the new law) to directly fund external organizations/intermediaries/networks to assist and train 21<sup>st</sup> CCLC grantees, and potential 21<sup>st</sup> CCLC grantees that request assistance, rather than be required to provide expert training themselves.
- Sec. 4201 (b) 5: Rigorous Review Process
  - Application Review Panel: we ask that ED guidance include a recommendation for an age-appropriate student representative to be a member of 21<sup>st</sup> CCLC application review panels. Several states do this currently and find it to be a successful practice. Student voice is under-represented in education programs and provides critical feedback for program development.
- Sec. 4203 (a) 3 A: Eligible entities
  - Programs have questioned and seek clarification regarding eligible entities and who may apply under the new law. Guidance should clarify that both schools and community-based organizations serving students attending Title I eligible schools with at least 40 percent free and reduced meal eligibility are eligible entities to apply to receive 21<sup>st</sup> CCLC grants, in addition to those attending schools implementing comprehensive support and improvement activities or targeted support and improvement activities. We recommend that the eligibility of community based organizations is made explicit or
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SEAs may not include them as potential recipients of 21<sup>st</sup> CCLC funds, which could result in negative consequences to the neediest communities.

- ESSA states in Sec. 4203 (s) that SEAs can fund “other schools determined by the local educational agency to be in need of intervention and support.” It would be helpful if ED can highlight this flexible language to clarify that states are allowed to grant awards to eligible entities that propose to serve students who primarily attend schools that serve a high percentage of students from low-income families.
- Sec. 4203 (a) 14: Performance measures
  - ESSA suggests additional indicators can be used to assess programs’ progress toward contributing to overall student success. While some examples of such indicators like attendance are spelled out in the law, we recommend that ED suggest additional indicators that address social and emotional learning /or employability skills.
  - For several years, state education agencies and local 21<sup>st</sup> CCLC grantees have been expressing concern about the current set of 21<sup>st</sup> CCLC performance measures. Given that new performance measures are required under ESSA, we strongly urge ED to work with the Office of Management and Budget to update the GPRA indicators to align with the new law and better reflect the research base on afterschool effectiveness. We suggest that ED consider updated indicators and reporting requirements that are reflective of outcomes that afterschool programs have been shown to help address, such as improved school attendance, on-time grade promotion, in-school behavior and developing college or career-ready skills.<sup>1</sup>
- Sec. 4204 (a)2: Expanded Learning Program Activities
  - ESSA includes language for “Expanded Learning Programs” for the first time as part of 21<sup>st</sup> CCLC. It is important to note the distinction of “Expanded Learning Programs” described in Part B of Title IV is separate and unrelated to the definition of “Expanded Learning Time” as defined in Title IX of ESSA. The specific 21<sup>st</sup> CCLC “Expanded Learning Program” description is found in Sec. 4202 (a) 2.
  - Within the Title IV Part B description of “Expanded Learning programs” we suggest clarifying what is meant by “academic enrichment” and “supplement not supplant ” to reinforce the notion that the “Expanded Learning Programs” funded under 21<sup>st</sup> CCLC should be ‘afterschool-like’ in nature and not be an extension or addition of traditional classroom activities.
  - Programs and states have recommended clarifying that the 300 hours described in this section of ESSA only applies to “Expanded Learning Programs,” and does not apply to before-school, afterschool or summer learning programs. Sections (a)1 and (a)2 are two separate 21<sup>st</sup> CCLC program types. The law does not intend for states to require all

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<sup>1</sup> Afterschool Alliance. (2015). *Evaluations Backgrounder: A Summary of Formal Evaluations of Afterschool Programs’ Impact on Academics, Behavior, Safety and Family Life*. Retrieved from [http://afterschoolalliance.org//documents/Evaluation\\_Backgrounder.pdf](http://afterschoolalliance.org//documents/Evaluation_Backgrounder.pdf).  
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grantees to follow a 300 hour minimum, only those with extended school days (2), so that funding can substantially contribute to student enrichment activities rather than adding a very short amount of time to the beginning or end of a school day or year.

- This section states that that community partner organizations are required of LEA applicants seeking to fund “Expanded Learning Programs”. Clarification on this point is recommended.
- Sec. 4204 (i) Priority
  - We suggest clarifying the priority described in Sec. 4204 (B) of ESSA prioritizing partnerships between LEAs and at least “another eligible entity”. Guidance should remind SEAs to prioritize partnerships between school districts and *highly effective* community based organizations. This will ensure a meaningful partnership greater than the sum of its parts focused on successful student outcomes.
  - In order to sustain community-school partnerships, we recommend that ED clarify that the data sharing described in Sec. 4204 (b)(2)(D), should entail community based partners actively collaborating with the schools that participating students attend (including through the sharing of relevant data between the schools and the community partners providing afterschool and summer programs).
- Sec. 4204 (j) Renewability of Awards
  - ESSA allows SEAs to renew 21<sup>st</sup> CCLC grants. We interpret this language as intending to support communities with exceptional need and few resources to allow them to sustain their programs when their grant expires. In instances where the SEA provides the option for renewal, ED should reiterate the language in the law, which is clear that grantees performance must be good in order to be renewed.
- Transition from NCLB to ESSA
  - While ED has been clear that the 2017-2018 school year will be the official transition, in order to be ready to make that transition many SEAs are preparing new requests for proposals (RFPs) and grant competitions now. We have heard a great deal of uncertainty expressed in the field about what will happen to current grantees funded under NCLB-governed competitions. In the interest of continuity of quality services for currently funded communities, we strongly encourage ED to issue guidance to SEAs suggesting that they allow current 21<sup>st</sup> CCLC grantees to finish out their 3 to 5 year grants rather than terminating them and requiring them to reapply under a new ESSA 21<sup>st</sup> CCLC RFP. As ED is aware, start-up of new programs is less cost effective and it takes time for programs to achieve a level of quality programming; therefore it is best to minimize interruptions of current grants, with the exception of the rare instances of issues with grantee performance.

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Additionally, we have heard from some providers that they would like to have parents fill out an application form to assist providers in determining the amount of parent contribution that might be paid to a program on a sliding scale. Providers are uncertain if collecting this information from parents is allowed. While fees themselves should never be a barrier to student or family participation in a 21<sup>st</sup> CCLC program, collecting data to determine reasonable fees should be allowed. If this is not prohibited, we would appreciate notice that this is an allowable activity.

Please do not hesitate to reach out to us if we can provide further clarification of any of the points above.

Sincerely,

Jodi Grant

Executive Director

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