The Education Trust

Closing the gaps in opportunity and
achievement, pre-K through college.

July 30, 2021

Office of Planning, Evaluation, and Policy Development
Attn: Nkemjika Ofodile-Carruthers, U.S. Department of Education
400 Maryland Avenue SW, Room 4W308
Washington, DC 20202

Re: Notice of Proposed Priorities and Definitions for the Secretary's Supplemental Priorities and
Definitions for Discretionary Grants Programs (Docket ID ED-2021-OPEPD-0054)

Thank you for the opportunity to submit public comments on the Department of Education's
("the Department") Notice of Proposed Priorities and Definitions for the Secretary's
Supplemental Priorities and Definitions for Discretionary Grants Programs. The six proposed
priorities are aligned with The Education Trust's focus on equity and ensuring that students from
low-income backgrounds and students of color have equitable access to resources and
opportunities necessary to succeed.

Proposed Priority 1— Addressing the Impact of COVID-19 on Students, Educators, and Faculty
Within proposed priority one, we are encouraged to see a focus on addressing the impact of
COVID-19 on the social, emotional, physical and mental health, and academic needs, and an
acknowledgement that these impacts will "extend beyond the timing of the pandemic itself."
We are also pleased to see that the priority recognizes that communities already possess assets
that may be utilized by educators to re-engage students.

We are especially excited to see a priority focused on the use of "evidence-based instructional
approaches and supports to accelerate learning for students…without contributing to tracking
or remediation." Instead, the priority seeks to support projects that use evidence-based
practices such as targeted intensive tutoring and expanded learning time. Our recent work on
unfinished learning found that these practices, along with developing strong relationships
between adults and students, are evidence-based strategies to solve unfinished learning.

However, we urge the Department to make the following changes:
While the priority is drafted to support that projects that are designed to address the impacts of
COVID-19, "including…the students most impacted by the pandemic," it does not clearly focus
on projects that are aimed at providing resources and supports to, "underserved students" (as
defined in the notice). The focus on underserved students is needed because COVID-19 has
exacerbated the inequities negatively impacting underserved students and the recovery from
COVID-19 needs to prioritize those who are most impacted. Therefore, we recommend the
following change to the introduction to priority one:

- Original text: Projects that are designed to address the impacts of the COVID-19
  pandemic, including impacts that extend beyond the timing of the pandemic itself, the
  students most impacted by the pandemic, and the educators who serve them through
  one or more of the following priority areas:

- Recommended text: Projects that are designed to address the impacts of the COVID-19 pandemic <u>on underserved students</u>, including impacts that extend beyond the timing of the pandemic itself, the students most impacted by the pandemic, and the educators who serve them through one or more of the following priority areas:

As indicated in our [report on social, emotional, and academic development](#), family engagement is critical to supporting academic success and social and emotional health in all students, especially those who are underserved. COVID-19 has disproportionately impacted underserved families. Schools need to build stronger relationships with families to meet their needs. Therefore, we recommend the following change:
- Original text: (a) Conducting community asset-mapping and needs assessments that may include an assessment of the extent to which students have become disengaged from learning, including students not participating in in-person or remote instruction, and specific strategies for reengaging and supporting students.
- Recommended text: (a) Conducting community asset-mapping and needs assessments that may include an assessment of the extent to which students have become disengaged from learning, including students not participating in in-person or remote instruction, and specific strategies for reengaging and supporting students <u>and their families</u>.

In addition to family engagement, community engagement is important to supporting student success. Community partners bring additional resources to meet the needs of students. COVID-19 has affected more than the learning of students. To adequately support students, especially underserved students, schools need to build a strong network of community partners. Thus, we suggest adding the following to the list of priorities:
- Building and sustaining partnerships between schools and key institutions, such as community-based health clinics, youth-serving organizations, and religious institutions, to provide evidence-based practices (e.g., wraparound services) that are needed to support positive social, emotional, physical and mental health, and academic outcomes.

Additionally, extensive research, including our report, [“If You Listen, We Will Stay: Why Teachers of Color Leave and How to Disrupt Teacher Turnover,"](#) has documented the challenges and barriers teachers of color experience. They are [more likely](#) to leave the profession in comparison to their White counterparts, and COVID-19 is likely to have an impact on the recruitment and retention of teachers of color. We suggest the following change:
- Original text: (d) Addressing teacher, faculty, and staff well-being.
- Recommended text: (d) Addressing teacher, faculty, and staff well-being <u>with targeted resources for educators and staff members of color.</u>

While we appreciate the priority specifically recognizes the unique needs of students with disabilities when using technically supported learning, we believe this priority should also recognize the unique needs of English learners. In addition, it's critical wherever "professional development" is included in a priority that this professional development be collaborative, job-embedded, and sustained. Therefore, we suggest the following change:
- Original text: (e) Providing students and educators with access to reliable high-speed broadband and devices; providing students with access to high-quality, technology-supported learning experiences that are accessible to children or students with

disabilities and educators with disabilities to accelerate learning; and providing educators with access to job-embedded professional development to support the effective use of technology.

- Recommended Text: (e) Providing students and educators with access to reliable high-speed broadband and devices; providing students with access to high-quality, technology-supported learning experiences that are accessible to children or students with disabilities <u>and English learners</u> and educators with disabilities to accelerate learning; and providing educators with access to <u>collaborative,</u> job-embedded, <u>and sustained</u> professional development to support the effective use of technology.

Finally, many teachers will need support and ongoing professional development to successfully address the unfinished learning that many students, especially underserved students, will have in the coming years. Therefore, we suggest the following change:

- Original text: (g) Using evidence-based instructional approaches and supports to accelerate learning for students in ways that ensure all students have the opportunity to successfully meet challenging academic content standards without contributing to tracking or remedial courses.
- Recommended text: (g) Using evidence-based instructional approaches and supports, <u>including professional development, coaching, and ongoing support for educators,</u> to accelerate learning for students in ways that ensure all students have the opportunity to successfully meet challenging academic content standards without contributing to tracking or remedial courses.

<u>Proposed Priority 2 — Promoting Equity in Student Access to Educational Resources, Opportunities, and Welcoming Environments</u>
Within proposed priority two, we are encouraged to see a focus on examining and addressing inequities by promoting access to and success in advanced coursework, creating more equitable and adequate approaches to school funding, expanding access to high-quality early learning in school-based and community-based settings, and increasing student racial diversity at multiple levels. We are also glad to see a priority on ensuring students have access to experienced, in-field, certified, and effective educators, as well as educators from traditionally underrepresented backgrounds.

Projects that can eliminate inequities in [funding](#), [advanced coursework](#), [early learning,](#) and access to effective and [diverse educators](#) will have a significant impact on ensuring underserved students have access to resources and opportunities to succeed academically. One indicator that students have achieved academic success is that they are ready for college and/or career. We are excited to see that the proposed priority includes support for high-quality career and technical education that is integrated in K-12 curriculum in addition to access to advanced coursework, high-quality STEM curriculum, and dual enrollment.

However, we urge the Department to make the following changes:
Efforts to strengthen the educator workforce must be centered on ensuring schools that schools serving the highest needs students and students of color do not have disproportionately high numbers of uncertified, inexperienced, and out-of-field educators.

Additionally, research is clear that teachers experience a <u>steep learning curve</u> especially in their first few years of teaching and a significant percentage of teacher growth occurs <u>in the first year of teaching</u>. Therefore, we recommend suggest a focus on non-novice educators (educators not in their first or second year of teaching) rather experienced educators more broadly.

Therefore, we suggest the following changes:
- Original text: (b)(2) Increasing the number and proportion of experienced, fully certified, in-field, and effective educators, and educators from traditionally underrepresented backgrounds or the communities they serve.
- Recommended text: (b)(2) Increasing the number and proportion of non-novice, fully certified, in-field, and effective educators, and educators from traditionally underrepresented backgrounds or the communities they serve <u>to ensure that</u> schools serving the highest needs students and students of color do not have disproportionately high numbers of uncertified, out-of-field, and novice teachers.

In addition, as noted above, <u>our research</u> has documented the challenges and barriers teachers of color experience. They are more likely to leave the profession in comparison to their White counterparts. Therefore, while we appreciate that proposed priority (b)(4) pays specific attention to the retention of fully certified, experienced, and effective educators in high-need schools and high-need fields, we suggest the following additional sub-priority:
- Recommended additional text: Improving the retention of racially, linguistically, and ethnically diverse educators.

To address the inequities, school systems must ensure funding and resources are <u>adequate and targeted</u> where there is greatest need. We suggest the following change:
- Original text: (b)(7) Creating more equitable and adequate approaches to school funding.
- Recommended text: (b)(7) Creating more equitable and adequate approaches to school funding <u>that align funding levels to students' diverse needs and account for districts' differential access to local revenue given differences in local wealth and income levels</u>.

We agree it is critical to increase student racial and socioeconomic diversity at multiple levels, but we believe these efforts should always include meaningful and ongoing family and community involvement. Therefore, we recommend the following change:
- The Department should require all grantees funded under (b)(13) to engage in "ongoing, robust family and community involvement <u>with a diverse group of stakeholders</u>."

In addition, many schools that appear socioeconomically and racially diverse are actually highly <u>segregated within the school building</u>. To ensure that efforts to increase student racial and socioeconomic diversity extend to the classroom level, we recommend adding the following to priority (b)(13)(ii):
- Promotion of within-school diversity and inclusion, such as efforts to end racialized tracking.

Proposed Priority 3 — Supporting a Diverse Educator Workforce and Professional Growth to Strengthen Student Learning
The need to provide a strong and diverse teacher workforce for all students is as urgent as ever, particularly as school and district leaders are developing plans to address unfinished learning

and help students catch up after the disruptions due to COVID-19. A growing body of research shows that having access to teachers of color benefits all students — and can be particularly transformative for students of color. Yet, only 21% of teachers in the U.S. are teachers of color. Moreover, the lack of diversity of the teacher workforce relative to the student population (more than half of all students in the national public school population identify as a person of color) is one of the key drivers of inequity in education, even as states and districts continue to invest in strategies to increase the racial diversity of their workforces. We are encouraged to see these proposed priorities have a focus on strengthening educator preparation and include a wide range of evidence-based strategies to provide all students with equitable access to well-prepared, diverse, and effective educators.

We are especially excited to see a priority for "Building or expanding high-poverty school districts' (as may be defined in the program statute or regulations) capacity to hire, support, and retain an effective and diverse educator workforce."

However, we urge the Department to make the following changes:
Supporting the recruitment, training, placement, retention, and promotion of teachers of color is critical to promoting equity and adequacy in student access to educational resources and opportunities. One strategy with demonstrated effectiveness in retaining teachers, and particularly teachers of color, is employing Grow Your Own (GYO) programs. Thus, we suggest adding two activities within this priority:

- Creating or enhancing grow-your-own programs targeting potential educators of color
- Investing in teacher academies and dual enrollment programing to promote the teaching profession to a racially diverse student population

In addition, high-need schools often face greater barriers attracting and retaining teachers for high-need subjects, including STEM courses. These courses are critical to ensuring all students have access to rigorous and high-quality coursework that will prepare them for college and careers. To address these inequities, we suggest including:

- Original text: (b) Increasing the number of teachers with certification in an educator shortage area, or advanced certifications from nationally recognized professional organizations.
- Recommended text: (b) Increasing the number of teachers with certification in an educator shortage area, or advanced certifications from nationally recognized professional organizations, and incentivizing recruitment and retention of these teachers in high need schools.

Finally, while we appreciate that all projects that could be supported under priority three are intended to focus on "undeserved students" (as defined in the notice), we encourage the Department to ensure that these projects are also focused on high need schools. Specifically, we recommend the Department make the following change:

- Original text: (e) Implementing loan forgiveness or service-scholarship programs for educators based on completing service obligation requirements.
- Recommended text: (e) Implementing loan forgiveness or service-scholarship programs for educators based on completing service obligation requirements in high-need schools

Proposed Priority 4— Meeting Student Social, Emotional, and Academic Needs
We are excited to see the Department recognizing the importance of meeting students social, emotional, and academic needs by developing and supporting educators and schools, as well as creating supportive, positive, and identity-safe education settings. While there has been a re-emergence of the acknowledgement of the importance of social-emotional learning, too often this is done without an equity lens. There has been growing recognition of the need to support holistic well-being, including as a preventive measure to discipline. However, approaches that center social and emotional skills without first addressing the environments in which students learn and live unfairly puts the onus on students to conform to dominant culture to survive discriminatory and harmful school climates. Some efforts to support social and emotional learning and development can be constructive and equity-focused, but too often the programs focused on social and emotional skill development have been used as yet another way to police student behavior and force assimilation, harming identity development for students of color, immigrant youth, and students from low-income backgrounds.

We are also encouraged to see an explicit focus on addressing inequities in discipline that negatively impact the social, emotional, physical and mental health, and academic outcomes in underserved students. The use of harsh discipline is disproportionate and negatively affects underserved students, including Black, Latino, and Native students; and students with disabilities, from pre-kindergarten to early elementary grades.

However, we urge the Department to make the following changes:
Too often, approaches to supporting social-emotional learning in schools ignore or minimize context, focusing solely on building specific skills (e.g., lessons on behavior, self-awareness, responsible decision-making, or conflict resolutions), and separating "academic learning" from social emotional development. These efforts too often are used as another way to control student behavior, but true support for students' social and emotional development is not about prescribing how students should behave. Instead, it should make schools rethink how they manage student behavior. Therefore, we recommend the Department make the following change:
- Original text: (a)(1) Fosters skills and behaviors that enable academic progress developed through explicit instruction in social, emotional, and cognitive skills;
- Replacement text: (a)(1) Fosters skills and behaviors that enable academic progress developed through ~~explicit~~ instruction ~~in~~ that integrates social, emotional, and academic ~~skills~~ learning into a larger effort focused on asset-based approaches that address adult beliefs and mindsets and the policies and practices necessary to create equitable and inclusive learning environments;

For decades, school policies have often been informed by the view that the language and cultures of many students and communities of color are deficiencies to be "fixed." That is why social-emotional learning efforts must be informed by parents, caregivers, students, and communities from diverse groups and who are representative of the community.
- Original text (b)(3): Engaging parents, caregivers, students, and community members as full partners in school climate review and improvement efforts.
- Recommended text: (b)(3) Engaging parents, caregivers, students, and community members from diverse backgrounds and who are representative of the community as full partners in school climate review and improvement efforts.

Proposed Priority 6—Strengthening Cross-Agency Coordination and Community Engagement to Advance Systemic Change
We appreciate the Department's emphasis on projects that are designed to take a systemic approach to improving outcomes for underserved students through multi-level coordination across sectors.

Proposed Definitions
It is important that the Department define "high-quality" early learning to include the following components, which better ensure equitable early learning practices. We suggest the following change:

- Recommended additional definition: High-quality early learning means programs that provide at least full educator compensation parity with kindergarten to grade three educators; use inclusion models to maximize the provision of the least restrictive environment (LRE) for children receiving services under the Individuals with Disabilities in Education Act (IDEA); engage in best practices for dual language learners; provide ongoing professional development in developmentally appropriate practices, including positive behavioral support models; and provide full-day programs.

While assessments are only one measure of student learning, and assessments alone will not address systemic discrimination and inequity in our education system, they are a critical tool to identifying and diagnosing gaps in equity and opportunity. To ensure that the "high-quality quality assessment" definition supports projects that will increase the quality of comprehensive assessment systems, we suggest the following changes:

High-quality assessment:
- Original Text: *High-quality assessments* means diagnostic, formative, or summative assessments that are valid and reliable for the purposes for which they are used and that provide relevant and timely information to help educators and parents or caregivers support students.
- Recommended Text: *High-quality assessments* means diagnostic, formative, or summative assessments that are valid and reliable for the purposes for which they are used; that provide relevant, ~~and~~ timely, and understandable information to help educators and parents or caregivers support students; that are aligned to college-and-career readiness standards; and that provide appropriate accessibility to all students, including English learners and students with disabilities.

Thank you for the opportunity to comment on these critical priorities.

Warm regards,

The Education Trust