Wallace

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RE: Comments from The Wallace Foundation in response to the invitation to comment on Draft Non-Regulatory Guidance for Title IV Part B, Nita M. Lowey 21st Century Community Learning Centers Program, of the Elementary and Secondary Education Act of 1965.

The Wallace Foundation is pleased to submit the following observations and recommendations in response to the invitation to comment on Draft Non-Regulatory Guidance for Title IV Part B, Nita M. Lowey 21st Century Community Learning Centers Program, of the Elementary and Secondary Education Act of 1965, dated May 17, 2023.

By way of background, The Wallace Foundation is a non-partisan, independent and endowed charitable foundation based in New York City. Through our work, we seek to develop and share research evidence that can inform practice and policy in three areas: K-12 education leadership; youth development, which comprises both afterschool and summer learning; and the non-profit arts sector. Over the past four decades, Wallace has invested hundreds of millions of dollars in municipalities and states across the country to better understand the benefits of afterschool and summer learning and how those benefits can be generated, while supporting improved access to high-quality programs. We adhere to the principle "we say more, only as we know more," limiting any recommendations we make to what the evidence base in these areas supports.

We applaud the Department for revisiting the non-regulatory guidance for the 21st Century Community Learning Centers, a program that is both a landmark in the history of out-of-school time learning and a continuing vital source of funding for programs that meet academic and developmental needs of young people, especially those who because of their family income have less access to high-quality programs than their peers from wealthier families. We also note that the research base behind afterschool and summer programs has grown substantially,[1] presenting the Department an opportunity to highlight what has been learned since the issuance of the current guidance document in 2003 consistent with the Every Student Succeeds Act's focus on evidence.[2]

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[1] For example, the 2019 report *Afterschool Programs: A Review of Evidence Under the Every Student Succeeds Act*, by Ruth Neild, *et al.,* commissioned by The Wallace Foundation from Research for Action, included a review of research from 2000 through 2017; of the 228 studies cited as references, 202 were published between 2004 and 2017, or about 16 each year, while 26 were published between 2000 and 2003, or about 9 per year. The story is similar in summer learning: The 2019 RAND report *Investing in Successful Summer Programs: A Review of Evidence Under the Every Student Succeeds Act,* by Jennifer Sloan McCombs, *et al.,* reviewed reports from 2000 to 2017. Of the 84 studies cited as references, 75 were published after 2003, with 9 published in 2003 and before. In short, the research base is growing – and the rate of new research studies has accelerated since the early 2000s.
[2] Non-Regulatory Guidance: Using Evidence to Strengthen Education Investments, Sept. 16, 2016, US Department of Education.

Toward that end of taking advantage of the growing research base, we are pleased to offer the following suggestions for consideration by the Department in three categories: Eligibility for funding, focus of programs, and guidance to states on implementation.

ELIGIBILITY FOR FUNDING

- **Be more consistently explicit in referencing *summer* programming as an allowable use of funds that can benefit young people, especially for those from low-income households who are the focus of the 21st Century program.** Summer is a time when students from low-income households lose ground compared to their wealthier peers. As a recent National Academy of Sciences consensus study *Shaping Summertime Experiences* found: "Summertime experiences can affect academic, health, social and emotional, and safety outcomes for children and youth, with those in disadvantaged communities at risk for worse outcomes."[3] At the same time, studies show that high quality summer programs can help level the playing field by generating a range of benefits including academic learning, social and emotional well-being, and career preparation.[4] To help districts take advantage of the opportunity that summer provides, we think it is helpful for the Department to be as clear as possible that summer programs are an intended use of funds. At present, states have put varying degrees of emphasis on summer programming. A recent survey found that among 25 states, only 10 states or less than half have a requirement for summer programming in their grant application; of the 15 that do not, less than half awarded priority points for including summer programming.[5] We note the Department in section D-22 is helpfully explicit in stating that an SEA <u>can</u> award a subgrant to operate a summer-only program. We urge the Department to underscore this by adding the word "summer" to other sections of the document that refer to activities on weekends or other times when school is not in session. For example, in section A-2, the parenthetical remark "such as before and after school, weekends, or during school breaks" could include summer, which would make it: "such as before and after school, weekends, summer, or during school breaks." Similarly, in the introduction, and sections A-2, D-6, D-22, E-4, and E-30, we would urge the Department to explicitly identify summer programming as an intended use of funding.

- **Be explicit that programs designed to enhance student learning and development through a broad array of enrichment opportunities can lead to a range of benefits depending on their focus and are eligible for funding.** We urge the Department to consider clarifying in section A-1 that programs offering high-quality developmental experiences – often known as "enrichment" – are eligible for funding because of their contribution to a young person's long-term success. *Foundations for Young Adult Success,* a 2019 synthesis of research by the Chicago Consortium on School Reform and

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[3] *Shaping Summertime Experiences: Opportunities to Promote Health Development and Well-Being for Children and Youth,* Martin-Jose Sepulveda and Rebekah Hutton, editors, National Academies of Sciences, Engineering, and Medicine, 2019, page S-1.

[4] *Investing in Successful Summer Programs: A Review of Evidence Under the Every Student Succeeds Act,* Jennifer Sloan McCombs, *et al.,* RAND, 2019.

[5] *Supporting Quality in Summer Learning: How Districts Plan, Develop, and Implement Programs | The Wallace Foundation,* Leslie Goodyear, *et al.,* 2022.

commission, noted that "Ensuring all young people have access to a multitude of rich developmental experiences is imperative to their success."[6] The report notes that "when young people have the opportunity to make contributions that are valued by others, they gain self-confidence and come to see themselves as capable and able to effect change in their own lives and in the larger world."[7] Similarly, the RAND Perspective *The Value of Out-of-School Time* notes that "enrichment activities help build human and cultural capital and develop and define children's interest and skills."[8] A review by the American Institutes for Research *Recognizing the Role of Research and Evidence: What does the research say about afterschool and summer programming* found that "Well-designed and well-implemented programs have the potential to increase young people's sense of belonging and self-worth; facilitate their development of new interests, sense of agency, and positive self-concept; and encourage them to engage in positive relationships with others. Benefits like this support re-engagement and can accelerate learning."[9] We think being explicit about the benefits of broadly-conceived enrichment will help districts and their partners understand the broad range of programs that are eligible for funding.

- **Consider adding to the list of eligible priorities of 21st Century funds**. We commend the Department for its comprehensive and helpful list of eligible priorities in section D-18 including creating a welcoming environment, supporting family engagement and promoting strong connections between schools and 21st CCLC programs. To this list we would recommend for your consideration two additional allowable uses: 1) Undertaking robust planning which research has indicated is an essential element in delivering high-quality summer learning programs; 2) Efforts to recruit students to voluntary programs as well as encourage consistent attendance, both of which are necessary for benefits.[10]

FOCUS OF PROGRAMS

- **Affirm that there is a sound evidence base for the benefits of high-quality afterschool and summer learning programming, drawing on the expanded research base.** As noted above, the growth of the evidence base since the current non-regulatory guidance was issued 20 years ago provides an opportunity for the Department to highlight what is currently known about effective afterschool and summer programming to inform LEA subgrants and uses of them – as is done in the current 2003 non-regulatory guidance document. For example, on page 26 of the 2003 guidance document, the Department notes a study by Reginald Clark on the "evidence of the importance of constructive learning activities during the non-school hours." The Department could go beyond this by drawing on additional research conducted in the past two decades. For

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[6] *Foundations for Young Adult Success: A Developmental Framework,* Jenny Nagaoka, *et al.,* The University of Chicago Consortium on Chicago School Research, 2015, page 7.

[7] *Foundations for Young Adult Success: A Developmental Framework,* Jenny Nagaoka, *et al.,* The University of Chicago Consortium on Chicago School Research, 2015, page 5.

[8] *The Value of Out-of-School Time Programs,* RAND, 2017, page 4.

[9] Guide-2-Research-Recognizing-the-Role-of-Research-and-Evidence-in-OST.pdf (air.org), American Institutes for Research, 2021, page 2.

[10] *Getting to Work on Summer Learning: Recommended Practices for Success, 2nd Edition,* Heather L. Schwartz, *et al.,* RAND, 2018, page ix-x.

example, in the area of afterschool, *Afterschool Programs: A Review of the Evidence Under the Every Student Succeeds Act* found "more than 60 programs with research evidence at Tiers I-III" that "improved a variety of outcomes, ranging from mathematics and reading/ELA achievement to physical activity/health, school attendance, promotion and graduation, and social and emotional competencies."[11] In summer learning, *Investing in Successful Summers* found 43 programs meeting the ESSA evidence review requirements for Tiers I to III, noting that "summer programs can be an effective mechanism to address the needs of children and youth... the summer timeframe presents an opportunity for meeting several types of children and youth needs, including academic, social, and emotional needs" and that "there is evidence of effective programs offered to all grade levels."[12]

- **Note the key dimensions of quality as suggested by the research base and reference tools to promote them.** Two decades of research has helped form a clearer picture of key dimensions of quality programming and of the link between quality and desirable outcomes, i.e., that as *The Value of Out-of-School Time* states, "program quality and intentionality influence outcomes."[13] We urge the Department to be direct about this linkage, and to point to key features of quality. For example, RAND researchers have stated that "quality OST programs are intentionally designed to provide engaging activities that are sequenced and aligned with program goals and are taught by trained, dedicated instructors who work effectively with youth."[14] Throughout the non-regulatory guidance draft, the Department usefully emphasizes the importance of program quality and we urge you to be more specific about the elements of quality, either through callouts, or references to research, tools,[15] examples, or a combination of the above.

- **Suggest that evaluation be aligned to a specific program's purpose.** We note that section D-18 provides guidance on the evaluation of subgrantee programs, with reference to statutory requirements in Section 4205(b), 2(A and B). Given the statute's requirement that the results of the local evaluation shall be "used to refine, improve, and strengthen the program or activity, and to refine the performance measures," we urge the Department to strongly suggest that evaluative measures be aligned with program goals. A key insight from RAND is "that OST programs are generally effective at producing the primary outcomes that would be expected based on their content and design" and that it therefore follows that "funders should expect and researchers should measure outcomes

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[11] *Afterschool Programs: A Review of Evidence Under the Every Student Succeeds Act,* Ruth Curran Neild, *et al.,* Research for Action, Abt Associates, McClanahan Associates, 2019, page ii.
[12] *Investing in Successful Summer Programs: A Review of Evidence Under the Every Student Succeeds Act,* pages xv-xvi.
[13] *The Value of Out-of-School Time Programs,* RAND, 2017, page 1.
[14] High-Quality Out-of-School-Time Programs Are Worthy of Investment | RAND.
[15] See, for example, the Youth Program Quality Intervention approach of the Forum for Youth Investment at Understanding the Youth Program Quality Intervention - The Forum For Youth Investment (forumfyi.org), the Summer Learning Planning Toolkit at Summer Learning Planning Resources and Toolkit - Wallace Foundation, the Framework for Measuring Afterschool Programs | Wallace (wallacefoundation.org) and Building, Sustaining and Improving: Using Federal Funds for Summer Learning and Afterschool | The Wallace Foundation.

that align with program content."[16] Yet, unfortunately, RAND researchers noted that "OST programs often have primary outcomes that are either understudied or not reported as often as academic or social and emotional outcomes."[17] Those understudied or unreported outcomes include, for example, "providing experiences to young people that they may otherwise not have, building human and social capital, and helping to close the opportunity gap."[18] In other words, measures can easily be misaligned with program content. Providing examples of evaluation measures aligned with program content would be useful for districts and other providers and help avoid the use of evaluative measures unrelated to the benefits that a particular program's focus are likely to generate – thus unintentionally under-valuing the program.

- **Promote the importance of consistent attendance for achieving meaningful benefits and the need for intentional steps to help achieve it.** For some benefits including academics, consistent attendance is essential in addition to high quality of programming; as one team of researchers put it "students cannot benefit if they do not sign up and attend regularly."[19] A study of 5-6 week voluntary summer programs combining academics and enrichment found that academic benefits were contingent on consistent attendance.[20] To encourage consistent attendance in voluntary programs, effort is needed. Summarizing helpful steps, RAND researchers recommended timely recruitment materials that set accurate expectations, personalized recruitment through handwritten notes or having a coordinator talk with families, establishing a firm enrollment cutoff date before the program begins, setting a clear attendance policy, tracking enrollees who don't attend as well as daily attendance, and if resources allow providing incentives to parents and students for consistent attendance.[21] In addition, positive site climate drives student daily experiences and enjoyment which, in turn, is linked to attendance: In one district studied by RAND, average daily attendance was 86% at sites where RAND observers consistently rated students as appearing to enjoy themselves, compared to 79% where observers consistently rated themselves as not. What mattered most in driving student

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[16] *The Value of Out-of-School Time Programs,* RAND, 2017, page 2.

[17] *The Value of Out-of-School Time Programs,* RAND, 2017, page 12.

[18] *The Value of Out-of-School Time Programs,* RAND, 2017, page 12.

[19] *Getting to Work on Summer Learning: Recommended Practices for Success, 2nd Edition,* page 35.

[20] *Every Summer Counts: A Longitudinal Analysis of Outcomes from the National Summer Learning Project,* Jennifer Sloan McCombs, *et al.,* RAND, 2020, page xvi and xviii. Researchers found that after one summer, students who attended a five-to-six-week summer program for 20 or more days in 2013 "outperformed control group students in mathematics in the fall" with the outperformance amounting to 25 percent of an average annual gain, and benefits also measured in spring 2014. After a second summer in 2014, "high attenders performed better than control group students in mathematics and language arts through spring 2015," a positive effect in spring representing 25 percent of average annual gains in math and 23 percent of average annual gains in English. Because most students who were high attenders in summer 2014 were also high attenders in summer 2013, RAND hypothesized that attending for two summers *and* improved program quality in the second summer both contributed to these benefits. Three school years after the second summer of programming, academic benefits for high and consecutive attenders, while smaller and not statistically significant "remained large enough to be educationally meaningful." Based on the findings, RAND concluded that "because benefits of the program were greatest for students who attended consecutive summers and those who had strong attendance, districts should actively work to promote high rates of student attendance within and across summers and encourage students to attend for multiple, consecutive summers."

[21] *Getting to Work on Summer Learning: Recommended Practices for Success, 2nd Edition,* page xii.

enjoyment was the quality of staff-to-student interactions, RAND found after looking at six factors. This conclusion mirrors Learning Policy Institute's finding that "positive relationships enable children and adolescents to manage stress, ignite their brains, and fuel the connections that support the development of the complex skills and competencies necessary for learning success and engagement. Such relationships also simultaneously promote well-being, positive identity development, and students' belief in their own abilities,"[22] a point the Department may want to highlight. The Department may also want to note that consistent attendance is possible in different types of summer programs: among the two communities of five studied by RAND with the highest attendance, one structured summer like a school year, the other like a summer camp, leading researchers to conclude that high attendance could be achieved in different program models and that a robust academic focus is not a barrier to either student enjoyment or attendance.

- **Underscore the value of partnerships between schools and community-based organizations.** We encourage the Department to underscore the value of partnerships between schools and community-based organizations or intermediaries, which have the potential to expand enrichment opportunities, help meet staffing challenges, expand participation and advance equity. According to the Learning Policy Institute, partnerships can "support greater coordination and access to services, youth development programs, and academic and cultural enrichment."[23] For districts seeking to offer enrichment, two out of three pathways to doing so involve partnerships, according to RAND, which identified three including: schools partnering directly with community-based providers; schools partnering with intermediaries that in turn contracted with providers; or, schools using existing district personnel.[24] Partnerships were means to address staffing challenges, budgetary restrictions, and access to a range of programs.

  Broader municipal partnerships for summer learning in the cities of Boston, Dallas, Pittsburgh, and Washington, D.C.– including intragovernmental collaborations, intermediary-led coordination, and muti-organization collaboratives – have also been shown to be effective in boosting access and focusing on quality. A study by RAND found that "through their efforts, the networks succeeded in raising awareness of summer opportunities throughout their cities… the number of children and youth participating in summer programming in these cities increased, and new programs were developed in high need areas" and that "network leaders made impressive strides in continuous improvement models and supported individual programs' quality development."[25]

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[22] *Design Principles for Schools: Putting the Science of Learning and Development into Action,* Learning Policy Institute and Turnaround for Children in partnership with the Forum for Youth Investment and in association with the SoLD Alliance, September 2021, page 2.
[23] *Design Principles for Schools: Putting the Science of Learning and Development into Action,* page 127.
[24] *Getting to Work on Summer Learning: Recommended Practices for Success, 2nd Edition,* page xiv. RAND also recommends qualified enrichment staff with strong content knowledge, instructors who have been trained in classroom management aligned with school policies, classes under 15 if possible, and sequenced activities.
[25] *Summer for All: Building Coordinated Networks to Promote Access to Quality Summer Learning and Enrichment Opportunities Across a Community,* Catherine H. Augustine, RAND, 2021, pages 41 and 45.

Finally, partnerships may also be useful in advancing districts' equity goals in afterschool and summer programs, according to University of Virginia researchers who examined efforts in 9 communities (including seven large school districts and three intermediary organizations). The researchers found that "The depth of equity efforts within the OST space appeared to be particularly strong in sites with strong intermediary and community partnership models."[26] They recommended "providing support for more partnerships between districts and local community-based organizations and/or intermediaries, including resources such as space and financial support, greater communication, and the inclusion of the community organizations in districts' decision making."[27]

GUIDANCE TO STATES ON IMPLEMENTATION

- **Ensure that a proposed new requirement for states to pre-screen external organization partners like intermediaries does not unintentionally exclude organizations that could help boost access to high-quality programs.** Within a state, it's possible that some organizations that *could* function as external organization partners might not be aware of the requirement to be on a pre-screened list and thus not submit their names to state officials. For that reason, we think it would be important to urge states to give potential external organizational partners, including nontraditional partners in rural areas, adequate opportunity to demonstrate their eligibility. In general, we urge the Department to make it clearer how the eligibility process is meant to work, and to explain what roles external partners could play in strengthening quality, designing programs, facilitating partnerships, and providing other forms of assistance.

- **Clarify that SEAs can use their funds to support state and local intermediaries that can provide training, professional development and support to local programs eligible to apply for 21st Century Community Learning Centers funding.** Given the importance of quality, we urge the Department to be as clear as possible that quality improvement efforts – often carried out by statewide or local intermediaries of various kinds – are an eligible use of funding which can involve state and local intermediaries.

We hope these observations and recommendations are helpful and thank you for the opportunity to comment. Please let us know if you have any questions we can answer.

Sincerely,

Will Miller

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President, The Wallace Foundation

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[26] *How Do Districts Implement Equity in Afterschool and Summer Programs? A Report to the Wallace Foundation,* Valerie Adams-Bass, *et al.,* University of Virginia School of Education and Human Development, 2022, page 27.
[27] *Expanding Equity in Afterschool and Summer Learning: Lessons from School Districts,* Cassandra West, The Wallace Foundation, 2022, page 4.