

July 27, 2021

Nkemjika Ofodile-Carruthers
U.S. Department of Education
400 Maryland Avenue SW, Room 4W308
Washington, DC 20202

Re: Proposed Priorities and Definitions-Secretary's Supplemental Priorities and Definitions for Discretionary Grants Programs; Docket Number: ED-2021-OPEPD-0054

Dear Ms. Ofodile-Carruthers,

The Center for American Progress (CAP) writes to provide support for, and additional recommendations regarding, the Secretary's proposed priorities and definitions for discretionary grants programs, as issued on June 30, 2021.

The Center for American Progress is committed to developing education policy rooted in the goal of opportunity for all, with equity and community at the center. Given this foundational principle, we are encouraged to see the Secretary approach these priorities with a focus on creating conditions under which students have equitable access to opportunity, which includes targeted support for individual student groups. CAP also believes that supporting students, families, and school staff, especially right now, requires looking beyond the status quo to systems-level changes and having a holistic understanding of their many social-emotional, academic, physical, and mental health needs. Therefore, we support the Secretary's emphasis on evidence-based and multifaceted solutions that look at improving systems and building capacity to work towards long-term change, not just short-term fixes.

In addition to affirming the Secretary's approach and framing of these priorities, CAP supports the six specific priorities and related definitions proposed by the Secretary. Within the definitions, CAP is especially supportive of the Department of Education's approach to include all settings where children are learning outside of their families and homes in their definition of the "early learning settings," including child care, family based child care, Early Head Start and Head Start, home visiting, early intervention, preschool programs within LEAs, and family, friend, and neighbor care. **CAP encourages the Department of Education (the Department) to give weight to grant applications** that prioritize collaboration with, consultation among, or funding for, such early learning partners.

Within each priority, CAP also writes to offer some additional recommendations to ensure that these priorities are best supporting students, families, and school staff.

Proposed Priority 1: Addressing the Impact of COVID-19 on Students, Educators, and Faculty

CAP supports this priority, especially how it highlights the fact that the pandemic disproportionately impacted certain student populations and exacerbated existing inequities. We also agree that it's important that during recovery, plans are made to address immediate concerns, like providing health

and safety measures and support for remote learning, as well as long-term priorities like offering mental health supports for students and educators.

We affirm the projects highlighted for prioritization by the Secretary, and recommend adding the following:

- Priority 1(a) and (c): The Department should explicitly note the necessity of including student voices when conducting community needs assessments. When it comes to supporting students, it is vital that students are given an opportunity to describe what their needs are and what kind of supports they are looking for.
- Priority 1(d): The Department should amend this priority area to say, “addressing teacher, faculty, and staff well-being, especially providing social, emotional, and mental health supports.” Educators already faced a lot of pressure and stressors before the pandemic, all of which has been exacerbated by the pandemic with new fears, demands, and unknowns added on. This has been especially true for educators who are Black, Indigenous, and other non-Black people of color (BIPOC). Providing these supports for educators is crucial to ensuring their well-being and will help them support the various needs of their students.
- Priority 1(e): In addition to providing training for educators on effective use of technology, the Department should add language to this priority area about “providing supports for students and families struggling with computer or technology literacy.” Before the pandemic, many students were not regularly using technology for schoolwork and there were gaps in familiarity with technology based on race and socioeconomic background.ⁱ Therefore, students and their families should also get a chance to receive additional support for success in using technology in addition to help with access. But CAP does appreciate that this priority area explicitly mentions the importance of ensuring accessibility for students and educators with disabilities.
- Priority 1(f): Rather than saying, “where possible, increase parent engagement,” the Department should say “increase student and family engagement.” There is a strong relationship between family engagement and student academic success, especially for Black, Indigenous, and Latinx students, and communication is more important than ever during a still tumultuous and confusing time.ⁱⁱ Family engagement should be viewed as essential, and schools should be listening to student caregivers to learn how to engage in a meaningful way.

Proposed Priority 2: Promoting Equity in Student Access to Educational Resources, Opportunities, and Welcoming Environments

Given CAP’s emphasis on educational equity, we strongly support this priority and the Department of Education’s recognition that decades of inadequate access to and inequitable distribution of resources has negatively affected underserved students in several ways. For example, they have access to fewer high-quality academic programs and resources, face higher school discipline rates, and have less access to qualified educators.

The Secretary has highlighted many great projects under this priority. In particular, Priority 2(b)(1) outlines several different ways that schools can improve students access to and success in approaches to learning that are ethnically, culturally, and linguistically inclusive and prepare students for college, career, and civic life. We support this emphasis on identifying equity gaps in both access and success, because we know that availability is not always the only problem. For example, a recent CAP report

found that students of color faced barriers when it came to the availability of AP courses, but also successful enrollment in available courses, likelihood of taking an AP test, and likelihood of passing an AP test.ⁱⁱⁱ Students of color were getting lost at each stage of this funnel, with states differing on which level of the funnel posed the biggest barrier to students of color. Therefore, it is important that schools spend time identifying what the biggest contributors are to their inequities so that they can target solutions appropriately.

Another priority that CAP particularly supports is the need for more equitable and adequate approaches to school funding, Priority 2(b)(7). Chronic underfunding of K-12 schools, especially schools in low-income communities and communities of color, is itself a major inequity in education and it makes it harder to address other opportunity and equity gaps.^{iv} Although there are changes to federal funding decisions that are necessary to address existing funding inequities, districts should also be looking at their funding decisions and how they can update it to increase equity and per-pupil funding amounts. **We'd also recommend that the Department add "developed in conjunction with community members" to this priority** to emphasize that schools need to seek out and incorporate the input of students, families, educators, and other community members during this process.

Furthermore, we recommend adding the following:

- Priority 2(b)(1)(vii): This priority correctly recognizes the importance and need for strengthening civics education in schools. We'd recommend adding a sentence about the importance of incorporating experiential learning into civics curriculum so that students can get a taste of civic engagement outside of the classroom. Additionally, students will need to be prepared to be active citizens in the digital age: therefore, the Department should recommend that civics education include news and media literacy to increase current events knowledge, internal political efficacy, and cultivate positive relationships with civic life.^v
- Priority 2(b)(12): This priority touches on an important topic, the need to support youth and adults after release from correctional facilities by linking youth or adults to appropriate support, education, or workforce training programs. The Department could add another sentence about the need for schools to examine what new policies are needed or what policies should be removed to make it easier for students involved with the criminal justice system to access and succeed in these education or workforce programs. In higher education especially, there are still many policies that make it harder for students with a criminal record to get admitted and access financial aid and housing.^{vi} Greater education equity means removing these barriers.

Proposed Priority 3: Supporting a Diverse Educator Workforce and Professional Growth to Strengthen Student Learning

CAP believes in developing policies that provide for a quality education for every child, and one critical pillar of that strategy is modernizing and elevating the teaching profession—including creating and supporting a more diverse educator workforce. Therefore, we greatly support this priority and are encouraged to see that Department elevate policies at the preparation level for prospective teachers, in the classroom to support current educators, and address the inequities in access to experienced and effective diverse educators, particularly for students from low-income backgrounds, students of color, and students with disabilities.

In particular, Priority 3(a) and (e) address the important need to increase access to educator preparation programs for diverse candidates and mentions loan forgiveness or service-scholarship programs. This highlights one steep barrier for many prospective teachers of color: a heavy student loan debt burden combined with low teacher pay. A CAP analysis has found that Black and Latinx especially relied heavily on federal student loans, and Black students had a harder time paying back those loans.^{vii} To further lighten the monetary cost to prospective teachers of color, **we recommend that the Department add to Priority 3(e) other types of financial assistance programs**, including help paying for non-tuition costs like certification or licensure fees.

Additionally, CAP appreciates that Priority 3(g)(1)(iv) is dedicated to preparing educators to meet the needs of students with disabilities. Most students with disabilities spend a majority of their day in general education classrooms, so it's important that all educators are taught the specific strategies and skills needed to best meet the academic and social and emotional needs of students with disabilities.^{viii} Additional attention should be paid to the way disability intersects with other identities, and how to avoid treating manifestations of disabilities as disciplinary issues. Not only should teacher preparation programs be readying educators before the classroom, but districts should provide onboarding so educators are aware of district-specific supports and processes, and ongoing professional development.

Finally, to increase the overall strength of Priority 3, CAP would recommend adding two new priority areas:

- Minority-serving institutions (MSIs) such as historically Black colleges and universities (HBCUs), Hispanic-serving institutions, and tribal colleges and universities prepare a large percentage of teachers of color. CAP would recommend adding a specific priority area in this section about supporting these institutions so they can support their diverse teacher candidates and fostering more state and district partnerships with these institutions so that students can gain experience in the classroom and ultimately find a place upon graduation.
- Better and more disaggregated data is also incredibly important when it comes to identifying what is contributing to a lack of teacher diversity. CAP would recommend adding a priority area around ways to collect, track, report, and use data to identify and address disparities in graduation rates, passage rates for certification and licensure exams, successful employment, retention, and more.

Proposed Priority 4: Meeting Student Social, Emotional, and Academic Needs

CAP is encouraged to see a priority dedicated to meeting the social, emotional, and academic needs of students. We are especially happy to see an emphasis on including the input of parents/caregivers, students, educators, and other community members when it comes to identifying how to create a safe and inclusive learning environment for students.

Within this priority, CAP supports the inclusion of a priority area addressing the health and safety of the physical space that students are learning in. Poor infrastructure can negatively impact children's ability to learn and their short-term and long-term physical health, and buildings are in especially bad condition in low-income communities and communities of color.^{ix} **CAP recommends that the Department add**

more to Priority 4(f) about specific ways that states and local educational agencies can support the process of improving their facilities across all early learning environments, as children and educators need safe and healthy learning environments, regardless of setting. **We recommend this priority make it explicit that this can be incentivized**, using language such as, “early learning environments can be supported with technical assistance, rent and mortgage assistance, green renovation, safe ventilation, and other supports.”

Additionally, the mental health needs of students are especially salient right now in light of the pandemic and the ongoing fight against racial injustice. Priority 4(g) highlights the importance of providing students equitable access to social workers, psychologists, counselors, nurses, or mental health professionals. CAP would recommend the Department also add two sub-points to this priority area:

- A sub-point on plans to increase the availability of mental health staff because many schools do not have enough staff to grant equitable access as needed.^x
- A sub-point to ensure that training, recruiting, and other policies regarding mental health care for students is developed in a culturally responsive and inclusive manner that takes into consideration the specific and differing needs of students that are BIPOC and LGBTQ students.^{xi}

Finally, CAP supports dedicating a priority area to creating a more inclusive environment at institutions of higher education. In addition to the methods recommended in Priority 4(c), **CAP would recommend conducting equity audits** to really get a sense of what policies, procedures, and supports could be improved to further encourage students of color to attend and to better allow students of color at the institution to thrive.^{xii} We also support the inclusion of Priority 4(k), which rightfully prioritizes the need to connect students with disabilities, adult with disabilities, and disconnected youth with resources to improve independent living and employment outcomes.

Proposed Priority 5: Increasing Postsecondary Education Access, Affordability, Completion, and Post-Enrollment Success

CAP supports the inclusion of this priority focused on postsecondary education, including career and technical education, and appreciates that the priority focuses beyond access to include preparation for higher education, affordability, support towards completion, and post-graduation success.

We particularly appreciate that the first area of prioritization in this section is on the need for partnerships with community colleges, HBCUs, tribal colleges and universities, and MSIs. Many students graduate from these institutions, especially students of color and students from low-income communities, and many of these institutions are deeply attuned to local needs and many of their alumni stay to give back to the community.^{xiii} Despite their importance, they’re often under resourced and it is important that in addition to partnering with these institutions, prioritization is given to addressing resource equity gaps within conversations about greater college affordability. Therefore, **CAP would recommend adding a priority area about addressing resource equity gaps at these institutions.**

Priority 5(f) highlights another important priority area, which is ensuring that conversations about the cost of postsecondary education go beyond tuition to include costs such as textbooks, housing, transportation, food, and potentially child care. Therefore, it is important that institutions providing financial assistance and other student supports includes plans to meet these additional basic needs. It is

especially important for adult learners—whose re-engagement with learning is prioritized in Priority 5(g)—that policies providing financial aid include them and other returning students.^{xiv}

Furthermore, CAP is encouraged to see that the Department is taking into consideration that the value of a college degree differs for underserved students. A 2020 CAP analysis found that Black and Latinx students experience longer paths to completion, higher debt burdens, and receiving jobs with lower pay and fewer benefits post-graduation in comparison to their white peers.^{xv} Therefore, it's great that Priority 5(d) explicitly looks to reduce the net price or debt-to-earnings ratio for underserved students who enroll in or complete college, other postsecondary education, or career and technical education programs.

CAP would also recommend making the following additions to Priority 5:

- We would add additional emphasis on the importance of ensuring that postsecondary education, and particularly career and technical education, lead to high quality jobs. Where the proposed priority aims to encourage adult learners to reengage, like in Priority 5(g), we recommend adding that the goal should be to help increase their employability *and* access to quality jobs that provide a living wage, strong workplace standards, and work-family supports.^{xvi} It would also be helpful to make the same addition to Priority 5(i).
- We also would suggest either adding to Priority 5(e) or establishing an additional priority area to encourage conducting equity audits—internal reviews of policies and practices to identify those that fail to effectively serve underrepresented students.^{xvii} These audits can address a range of issues such as admissions and financial aid, counseling services on campus, instructor diversity, and accessibility for students with disabilities. Using the results of such audits to implement reforms should also be encouraged.

Proposed Priority 6: Strengthening Cross-Agency Coordination and Community Engagement to Advance Systemic Change

CAP firmly believes that education policymaking should be done with community and that supporting students and their families often mean addressing needs outside of the school building. Therefore, CAP greatly supports the inclusion of this priority focused on working across agencies and with community in the service of systemic change. We're especially encouraged to see that Priority 6(c) highlight the importance of supporting families. Strengthening community and multi-generational opportunities will help ensure that students have learning environments inside and outside of schools that are safe and supportive—and that will help them succeed in education and build towards their future.

Another policy area that would really benefit from cross-agency coordination and community engagement is preparing students for college, career, and civic life.^{xviii} Schools are an integral part of providing students with the broad range of knowledge, skills, and abilities to get good jobs and be active citizens. However, they also need input from broader parts of the community. For example, schools can partner with local employers to accurately identify what career preparation and training is needed for students to be successful in current and emerging local industries. Likewise, students can participate in experiential-learning or service-based learning with local community organizations to become more civically engaged. Even within the umbrella of educational institutions, greater coordination needs to be happening between elementary and secondary education so that the foundation for career preparation

can be set early and built on, and between K-12 and higher education so that there's alignment of expectations and the skills needed to prepare students for success. **CAP would recommend amending Priority 6(a)(11) to say college readiness, workforce development, and civic life.**

We would also recommend cross-agency coordination and community engagement for modernizing and elevating the teaching profession, including improving teacher diversity. For example, the state agency focused on housing and urban development could be consulted to address the fact that many educators, especially educators of color, cannot afford to live in the communities they teach in and that has implications for retention. On the community front, it's important that any policies on this topic are created with many community stakeholders, especially educators, given that they'll be directly impacted. But it's also important to include staff from educator preparation programs to incorporate their expertise on any barriers or opportunities. **CAP would recommend adding "supporting and elevating the teaching profession" to the list of policy issues included in Priority 6(a).**

Finally, CAP recommends that the Secretary add a specific priority area for grant applicants to include students as a partner in meaningful and formal ways. As the people most directly impacted by education policies, they have unique insight on what is and isn't working for them: their inclusion is especially important because in many cases, decision makers do not reflect the demographics of the student population and may not understand the struggles of students and the supports they need. There are many ways that student voice can be incorporated, such as student advisory groups, a voting student member on the school board, or empowering student governments with real decision-making authority.^{xix} The important thing is that they exist, and they are empowered to really make a difference, not just as a box to be checked.

Conclusion

Overall, CAP commends the Secretary and the Department of Education for these great priorities and the important priority areas highlighted within them. We are also happy to speak further about any of the additional recommendations provided. Please feel free to contact Khalilah Harris, Acting Vice-President of K-12 Education Policy, at kharris@americanprogress.org.

Thank you,
Center for American Progress

ⁱ National Center for Education Statistics, "U.S. Results from the 2018 International Computer and Information Literacy Study" (Washington: 2019), available at <https://nces.ed.gov/blogs/nces/post/new-study-on-u-s-eighth-grade-students-computer-literacy>.

ⁱⁱ Meg Benner and Abby Quirk, "One Size Does Not Fit All" (Washington: Center for American Progress, 2020), available at <https://www.americanprogress.org/issues/education-k-12/reports/2020/02/20/480254/one-size-not-fit/>.

ⁱⁱⁱ Roby Chatterji, Neil Campbell, and Abby Quirk, "Closing Advanced Coursework Equity Gaps for All Students" (Washington: Center for American Progress, 2021), available at <https://www.americanprogress.org/issues/education-k-12/reports/2021/06/30/500759/closing-advanced-coursework-equity-gaps-students/>.

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- ^{iv} Scott Sargrad and others, “Public Education Opportunity Grants” (Washington: Center for American Progress, 2020), available at <https://www.americanprogress.org/issues/education-k-12/reports/2020/10/08/491255/public-education-opportunity-grants/>.
- ^v Ashley Jeffrey and Scott Sargrad, “Strengthening Democracy with a Modern Civics Education” (Washington: Center for American Progress, 2019), available at <https://www.americanprogress.org/issues/education-k-12/reports/2019/12/14/478750/strengthening-democracy-modern-civics-education/>.
- ^{vi} Bradley D. Custer, “3 Ways the Biden Administration Can Give Second Chances to Justice-Impacted College Students” (Washington: Center for American Progress, 2021), available at <https://www.americanprogress.org/issues/education-postsecondary/news/2021/04/19/497880/3-ways-biden-administration-can-give-second-chances-justice-impacted-college-students/>.
- ^{vii} Bayliss Fiddiman, Colleen Campbell, and Lisette Partelow, “Student Debt: An Overlooked Barrier to Increasing Teacher Diversity” (Washington: Center for American Progress, 2019), available at <https://www.americanprogress.org/issues/education-postsecondary/reports/2019/07/09/471850/student-debt-overlooked-barrier-increasing-teacher-diversity/>.
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- ^{ix} Elise Gout, Jamil Modaffari, and Kevin DeGood, “The Compound Benefits of Greening School Infrastructure” (Washington: Center for American Progress, 2021), available at <https://www.americanprogress.org/issues/green/reports/2021/05/17/499493/compound-benefits-greening-school-infrastructure/>.
- ^x Neil Campbell, Abby Quirk, and Roby Chatterji, “The Opportunity and Counseling Corps: Helping K-12 Students and Young Adults Recover from the Coronavirus Crisis” (Washington: Center for American Progress, 2020), available at <https://www.americanprogress.org/issues/education-k-12/reports/2020/08/10/489168/opportunity-counseling-corps-helping-k-12-students-young-adults-recover-coronavirus-crisis/>.
- ^{xi} Abby Quirk, “Mental Health Support for Students of Color During and After the Coronavirus Pandemic” (Washington: Center for American Progress, 2020), available at <https://www.americanprogress.org/issues/education-k-12/news/2020/07/28/488044/mental-health-support-students-color-coronavirus-pandemic/>.
- ^{xii} Ben Miller, “It’s Time to Worry about College Enrollment Declines Among Black Students” (Washington: Center for American Progress, 2020), available at <https://www.americanprogress.org/issues/education-postsecondary/reports/2020/09/28/490838/time-worry-college-enrollment-declines-among-black-students/>.
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- ^{xv} Ariana De La Fuente and Marissa Alayna Navarro, “Black and Latinx Students Are Getting Less Bang for Their Bachelor’s Degrees” (Washington: Center for American Progress, 2020), available at <https://www.americanprogress.org/issues/education-postsecondary/news/2020/01/23/479692/black-latinx-students-getting-less-bang-bachelors-degrees/>.
- ^{xvi} Center for American Progress, “A More Perfect Union: A Policy Blueprint for Economic, Social, and International Rebuilding in the Post-COVID-19 Era” (Washington: 2021), available at <https://www.americanprogress.org/issues/economy/reports/2021/01/13/494444/a-more-perfect-union/>.

^{xvii} Marcella Bombardieri, “Equity Audits: A Tool for Campus Improvement” (Washington: Center for American Progress, 2019), available at <https://www.americanprogress.org/issues/education-postsecondary/news/2019/04/03/465193/equity-audits-tool-campus-improvement/>.

^{xviii} Laura Jimenez, “Preparing American Students for the Workforce of the Future” (Washington: Center for American Progress, 2020), available at <https://www.americanprogress.org/issues/education-k-12/reports/2020/09/14/490338/preparing-american-students-workforce-future/>.

^{xix} Megan Ferren, “5 Ways to Include Student Voice in Education Policymaking” (Washington: Center for American Progress, 2021), available at <https://www.americanprogress.org/issues/education-k-12/news/2021/02/17/495853/5-ways-include-student-voice-education-policymaking/>.