



♥ Ensuring a Place at the Table for Every Family

July 30, 2021

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

RE: ED–2021–OPEPD–0054

Submitted at: www.regulations.gov

Dear Ms. Carruthers:

On behalf of the National Center for Parent Leadership, Advocacy, and Community Empowerment (National PLACE), we are submitting these comments in response to the Secretary's Proposed Supplemental Priorities and Definitions for Discretionary Grant Programs. National PLACE and our 70 local, state and national member organizations are committed to ensuring that families and family-led organizations are at the table when decisions regarding children and families are being made, and that our voices, experiences, and perspectives meaningfully influence those decisions. We have reviewed the Secretary's proposed priorities for use in discretionary grant programs and include our thoughts below. Our primary goal is to strengthen the voice of families and family-led organizations at decision-making tables on issues impacting our nation's children and families, especially those who face the greatest challenges and have the poorest outcomes, including children with disabilities, children of color, immigrant children, low-income children, and LGBTQ children, and their families.

National PLACE supports the comments of the Consortium for Citizens with Disabilities Task Force and our member, The Advocacy Institute. In terms of our priorities, we are concerned that the proposed priorities only peripherally mention parent/ family involvement, parent/family engagement, parent/family empowerment, or any other terms related to the invaluable and crucial role of families in their children's education at not only the individual but also the school, district and state level.

The position of National PLACE is that informed, knowledgeable, and empowered families must be at the heart of every initiative from every federal, state and local agency that serves children, youth and families, and thus, must be included in every priority for discretionary grant programs that are in place today or in the future. Historically, the most effective way to ensure that children with disabilities, or those who face other challenges due to discrimination, etc., has been through educated and engaged parents who have been prepared to effectively partner with professionals and advocate on behalf of their children. National PLACE believes that the most effective and efficient way to educate, engage, and empower families is through supporting family-led, family-serving organizations – staffed by people with lived experience in the systems they are helping parents navigate and advocate in - whose primary commitment is to family empowerment and who bring the knowledge, skills, experiences, and expertise that only peers can bring to the work.

National PLACE is also concerned that the proposed priorities do not mention the Department's investment in family-led, family-serving organizations. The Individuals with Disabilities Education Act (IDEA)'s focus on funding family organizations such as Parent Training and Information Centers and Community Parent Resource Centers to prepare and support parents has resulted in millions of families being better prepared for these roles. The fact that the proposed priority ignores this reality and opportunity is troubling.

One final introductory comment. In several areas in the proposed priorities, there is discussion of involvement of both community members and families. However, there are other instances that only discuss involvement of community members. Families of the infants, toddlers, children, youth and young adults served by ED programs are, along with their children, the intended beneficiaries of those programs and thus should always be specifically and explicitly mentioned in each and every area as a key constituency that must be meaningfully involved.

Our specific comments on each of the priorities are summarized below.

Proposed Priority 1 – Addressing the impact of COVID-19 on Students, Educators, and Faculty: National PLACE strongly recommends revising this priority to include the impact of COVID-19 on infants, toddlers, children, youth and young adults, and their families, educators, and faculty. The US Department of Education's reach and focus must be on children, not just students, for example, infants and toddlers with disabilities who access early intervention services, and the priorities must reflect this reality. In addition, children live in families, and service systems must include support for the families of the children they serve.

National PLACE thanks the Secretary for clarifying it ED's focus on "underserved students" that "Underserved students are also more likely to rely on key school- or campus-supported resources such as food programs, special education and related services, health services (including mental health), counseling, or after-school programs to meet basic or developmental needs." The specific reference to special education helps establish that children with disabilities are in fact among the group of students significantly impacted by the pandemic.

Proposed Priority 2 – Promoting Equity in Student Access to Educational Resources, Opportunities, and Welcoming Environments: National PLACE supports equity in student access to educational resources, opportunities and welcoming environments, but again, the Secretary must include the full range of infant, toddlers, children, youth and young adults and their families who are part of the US Department of Education’s focus, specifically the infants and toddlers and youth and young adults with disabilities who are served by the Office of Special Education and Rehabilitative Services (OSERS)-funded programs. Just using the term “students” is too exclusionary.

National PLACE appreciates the focus on parent engagement in this area (#6 “using technology to enable evidence-based interventions to...increase parent engagement;” #13 “increasing student racial or socioeconomic diversity at multiple levels, through one or more of the following: ii. Developing or implementing evidence-based policies or strategies that include one or more of the following: (A) Ongoing, robust family and community involvement).

Proposed Priority 3 – Supporting a Diverse Educator Workforce and Professional Growth to Strengthen Student Learning: National PLACE reiterates our comment regarding the importance of using inclusive terms (i.e., not “educator,” but “professional” or “service provider.”) National PLACE is aware that, as ED notes, “there is significant inequity in students’ access to well qualified, experienced, and effective teachers, particularly for students from low-income backgrounds, students of color, and children or students with disabilities.” National PLACE strongly endorses targeted efforts to ensure access to educators, early intervention and transition to adult life providers, aides, and others, who are prepared, through pre-service and ongoing in-service development, to address the needs of all infants, toddlers, children, youth and young adults they serve, and their families.

Under this priority, National PLACE particularly appreciates the focus on “(vi) Building meaningful and trusting relationships with students’ families to support in-home, community-based, and in-school learning,” and “(h) Increasing educator capacity to collaborate with diverse stakeholders to carry out rapid iterative cycles of evaluation...” The focus on ensuring that educators are prepared to work with the full range of diverse families should be a key component of each and every area under this priority! Also, as noted earlier, the priority should not just be about students or educators.

Proposed Priority 4 – Meeting Student Social, Emotional, and Academic Needs: As an organization made up of family-led, family-serving organizations, National PLACE fully understands the importance of meeting the full range of needs of infants, toddlers, children, youth, and youth adults and their families, including in particular their social and emotional needs, and thanks the Department for including this priority. As noted in each priority above, the focus should not just be on students or educators or schools but rather on children and families, professionals/providers, and provider agencies or institutions.

National PLACE believes that this priority, focused on developing an educated and well-prepared workforce and informed, thoughtful, productive community members, must include the active and informed engagement of parents, families, and youth themselves. This must be explicitly addressed throughout the priorities! For example, National PLACE recommends revising (a) to include parents, as follows: “(a) Developing and supporting educator/provider, school/provider agency, *and parent/family* capacity to support social and emotional learning and development...” National PLACE supports the proposed language, “(b) Creating supporting, positive and identity-safe education or work-based settings that provide racially, ethnically, culturally, and linguistically inclusive instruction, through one or more of the following activities: (1) Developing trusting relationships between students, educators, families and community partners, including engaging underserved students,,, (3) Engaging parents, caregivers, students and community members as full partners in school climate review and improvement efforts...”

National PLACE strongly endorses the inclusion of the following in this priority:

(d) Providing multi-tiered systems of supports to meet students’ academic, social, and emotional needs, including by offering evidence-based trauma-informed practices, to address learning barriers both in and out of the classroom, that enable healthy development and respond to students needs and which may include professional development for educators on avoiding deficit-based approaches.

(e) Developing or implementing policies and practices that prevent or reduce significant disproportionality on the basis of race or ethnicity with respect to the identification, placement, and disciplining of children or students with disabilities.

(g) Providing students equitable access to social workers, psychologists, counselors, nurses, or mental health professionals and other integrated services and supports, which may include in early learning.

Proposed Priority 5 – Increasing Postsecondary Education Access, Affordability, Completion, and Post-Enrollment Success: National PLACE is particularly concerned that this priority does not mention the word “parent” or “family,” as if youth and young adults in post-secondary programs are not still part of their family and are not still assisted by their parents! This priority must include a focus on supporting parents to support their youth/young adults in accessing and completing higher education.

Proposed Priority 6 – Strengthening Cross-Agency Coordination and Community Engagement to Advance Systemic Change: National PLACE strongly supports this commitment to promote and support inter-agency collaboration across ED to support and improve equity and ensure improved outcomes, particularly for those with disabilities, of color, English language learners, etc. National PLACE endorses the language in the background section of this priority:

“Schools and campuses are often the center of the community for students and their families, providing students with the resources and referrals they need to meet their full potential. Ensuring that students and families have access to nutritious food, housing, health services, employment/financial services, and other community resources is pivotal to ensuring success in the classroom, which in turn uplifts community vitality. These needs are best met through cross-agency coordination and partnerships between schools, campuses, and other organizations in the community. In this way, effective partnerships can make it easier for families to have various needs met by the school and support systemic, long-term change...”

However, we note that it is not always the case that schools are seen as the center of the community for families and communities, and the priorities should reflect this reality. When educators and school officials use immigration or child welfare officials to threaten and intimidate parents, for example, families do not trust them and will not rely on them for help.

Conclusion

In conclusion, we appreciate the opportunity to comment on the Secretary’s Proposed Priorities, but urge a reconsideration to address and integrate the importance of informed and involved parent/family engagement, and the collaboration and partnership with family-led, family-serving organizations that help families navigate through and advocate in these systems, throughout each and every priority. Further, National PLACE strongly recommends that any priorities or decisions made about our children’s education must be conducted with the active and meaningful participation of representatives of parents of infants, toddlers, children, youth and young adults served by US ED-funded programs as well as the family/parent organizations that provide them with information and support and represent their interests. For any questions or for additional information about this letter and its recommendations, please contact Diana Autin, Executive Director of the National Center for Parent Leadership, Advocacy, and Community Empowerment (National PLACE), at dautin@parentsatthetable.org.

Sincerely:



Diana MTK Autin, Executive Director
On behalf of National PLACE