



♥ Ensuring a Place at the Table for Every Family

September 16, 2021

Attn: Matthew Soldner
National Center for Education Evaluation and Regional Assistance & Evaluation Officer, Institute
for Education Sciences
U.S. Department of Education
400 Maryland Avenue SW, Room 4160
Washington, DC 20202

Re: ED Docket ID ED-2021-IES-0118

Dear Dr. Soldner:

On behalf of the National Center for Parent Leadership, Advocacy, and Community Empowerment (National PLACE), we are submitting these comments in response to the IES Learning Agenda's priority questions and evidence-building activities for each of the six items proposed for the Learning Agenda. 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 questions and evidence-building activities 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 (CCD) Education Task Force, of which we are a member. In terms of our priorities, we are concerned that the proposed priorities only peripherally mention, and only in the introduction, parents or families. There is no mention of or focus on 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, state level, and national 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 research and evidence-building efforts 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. For example, 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 questions and evidence-building activities ignore this reality and opportunity is troubling.

One final introductory comment. In several areas in the proposed priority questions, there is discussion of involvement of communities but not of families or parents. Parents and 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, and their role as their children's first and ongoing educators must be included in research and evidence-building questions.

We include specific recommendations for 5 of the 6 proposed priority areas below.

1. Addressing the impact of COVID-19 on students, schools and institutions of higher education, educators, and their communities.

We strongly recommend that this item be revised to specifically mention students *and their families/parents*, and not just communities, as it is at least anecdotally clear that families/parents of students with disabilities functioned as their core educators during periods of virtual/remote learning. It is widely recognized that parents were their children's educators in many instances during this pandemic, significantly elevating the role of parents in their children's education. This change has spawned reports that examine the change in parent-school collaboration such as [Embracing a New Normal: Toward a More Liberatory Approach to](#)

[Family Engagement](#) by Dr. Karen Mapp and Eyal Bergman, experts in family engagement. Many of the practices that schools employed out of necessity should be studied to identify their value post-pandemic. We further recommend that, in addition to other critical areas highlighted by other organizations and coalitions, evidence also be built on the impact of the pandemic on school-parent communications disaggregated by student subgroups.

2. Promoting equity in student access to educational resources, opportunities, and welcome, safe, and inclusive environments.

School-parent/family communications play a critical role in ensuring equity in student access. The requirement for collaboration is built into the IDEA's Individualized Education Program process as well as Title I of the Elementary and Secondary Education Act. Thus, examining how these communications were executed during the pandemic would provide valuable information for future considerations. We recommend that evidence be built on equity, including student access to well-prepared, qualified, diverse, and effective teacher, resource allocation, and non-exclusionary discipline practices and monitoring systems, as well as on how the pandemic impacted school/parent communication and collaboration including those required by IDEA and ESA, disaggregated by race, ethnicity, socio-economic status, and disability category.

3. Meeting student social, emotional, mental health, basic and academic needs

Parents play a critical role in meeting students' social, emotional, mental health, basic and academic needs. Learning how to maximize that role can provide important information for the future. Identifying specific strategies that parents can use to support and promote social and emotional learning as well as the academic needs of their students need to be part of the examination. We recommend that evidence be built on the following topics: efficacy of social-emotional learning interventions for subgroups of students who face the greatest discrimination, what circumstances contributed to students, especially the most underserved, thriving, and the role of parents in learning recovery initiatives including re-engaging with school, promoting social-emotional learning interventions and facilitating educational success.

4. Increasing postsecondary education access, affordability, completion, and post-enrollment success

Planning for success in postsecondary education takes time and organization, as noted by the [National Parent Center on Transition and Employment](#). The role of transition planning in postsecondary access and success, including parent involvement and support, should be examined to determine the extent to which this IDEA requirement is contributing to the success of students with disabilities. We recommend that, in addition to other specifics noted by CCD and other equity advocates, the efficacy of transition planning including the role of parents and the impact of the pandemic on transition activities including those provided by agencies such as Vocational Rehabilitation services.

5. Supporting a well-prepared diverse educator workforce and their professional growth to strengthen student learning

Effective collaboration with parents and families is critical for educators in all situations, but even more so during and after pandemics and other emergencies. We recommend that evidence be built on access and retention for teachers, including teachers serving students with the greatest needs with a focus on teachers of color, as well as the key contributing factors to attracting and retaining well-prepared, diverse teachers who are also prepared to partner meaningfully and deeply with diverse parents and families.

Conclusion

In conclusion, we appreciate the opportunity to comment on the IES Proposed Priority Questions and Evidence-Building Activities but urge a reconsideration to address and integrate the importance of studying the impact of informed and involved parent/family communication and 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