



# The Collaborative for Building After-School Systems

June 11, 2013

The Honorable Tom Harkin  
Chairman  
Committee on Health, Education, Labor  
and Pensions  
United States Senate  
428 Senate Dirksen Office Building  
Washington, DC 20510

The Honorable Lamar Alexander  
Ranking Member  
Committee on Health, Education, Labor and  
Pensions  
United States Senate  
455 Senate Dirksen Office Building  
Washington, DC 20510

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Dear Chairman Harkin and Ranking Member Alexander,

The *Collaborative for Building After-School Systems (CBASS)* writes in support of 21<sup>st</sup> Century Community Learning Centers (21<sup>st</sup> CCLC) provisions in S. 1094, *the Strengthening America's Schools Act of 2013*. CBASS is a coalition of intermediary organizations in communities nationwide dedicated to increasing the availability of quality expanded learning opportunities. We believe in strong partnerships between schools and community partners that increase learning time through a full range of enrichment opportunities.

We very much appreciate that the bill includes language that does not allow federal preference or priority on which expanded learning program will be used. We are also pleased to see that partnerships are a required part of the program, there is language to support for quality and innovative programs and clarity on who can be fiscal agent. As nonprofit intermediary organizations, we believe programs that foster strong partnerships between community-based organizations and local school districts are the best way to support student success.

We want to work with you to ensure that the 21<sup>st</sup> CCLC program supports the highest-quality learning and enrichment programs to promote full day learning strategies. In order to achieve that goal, we would like to work with you as the process moves forward to ensure that the 21<sup>st</sup> CCLC program is the strongest support for expanded learning possible. We believe that the program can continue to be strengthened by the following policies:

**Ensure that programs have the capacity to succeed by strengthening the role of intermediaries to support systems-building efforts.** Districts and community partners need co-management capacity in order to leverage the strengths of external entities. Expanded learning opportunity programs need extra support to meet their goals and help all students achieve. Providers often lack resources, training, systems, and strategies to succeed. Intermediaries help schools and nonprofits excel at direct student services, while providing the wrap-around services needed to build capacity, sustain and grow scalable programs, and get results. There is a need to build capacity

and systems across programs to increase the return on investment, ensure sustainability, and improve results.

*Recommended language:*

*In section 4601(b) add a new section (4), — (4) Intermediary. The term —intermediary means a non-profit organization with expertise in training, forging public-private partnerships, systems development, capacity building, improving scalability, and evaluation of expanded learning opportunities.”*

*In Section 4604(g) insert a new (E), — (E) include an intermediary as a partner.*

*State activities. 4602(c)(3)(B) after “part” insert “in partnership with high-quality local, state, or national intermediaries”*

**Ensure 21<sup>st</sup> CCLC Funds Are Used To Provide Direct Services To Students.**

CBASS is supportive of the recent approach that would broaden the 21<sup>st</sup> CCLC program to include expanded learning time programs during regular school hours, but we have concerns about funds being used to “comprehensively redesign the school schedule for all students in the school.” While “redesign” has not been defined, there is federal precedent that makes clear that “redesign” means using funds for reforming practices inside the regular school day. Redesign activities require significant planning time and resources, which could reduce funding available for expanded learning services for students. Accordingly, it does not make sense to pay for a whole school turnaround effort with 21<sup>st</sup> CCLC funds that should be used to provide students with additional time to participate in academic and enrichment activities that complement the academic program.

ESEA Title I and other programs supporting school turnaround efforts— funded at over \$15 billion in FY 2012 – should be used in coordination with 21<sup>st</sup> CCLC funds to support the administrative actions associated with whole-school redesign. We believe that only when funds are dedicated to direct services for students through additional learning time activities – whether afterschool, before school, summer learning, and/or expanded learning time – will federal funds have the dramatic impact on ensuring more students have access to more high-quality learning time that 21<sup>st</sup> CCLC intends. Accordingly, we believe that 21<sup>st</sup> CCLC funds should complement not supplant school-day turnaround efforts.

*Recommended language: In sections:*

*4601(a)(4) strike “comprehensively redesign and implement an expanded school day, expanded school week, or expanded school year schedule for all students in a high-need school,” and insert “expand learning time through expanded school day, week,*

*or year and coordinate those activities with comprehensive school redesign efforts in low achieving schools” before “to provide additional time”*

*4601(b)(1)(C) strike “redesign the school’s program” and insert “as part of a comprehensive redesign effort supported from funds outside of part D” before “in a manner that includes additional time”*

*4601(b)(1)(C)(i) strike “for academic work, and” and insert “and learning” after teaching.*

**Ensure Partners Are Included In Professional Development Activities.** In order to implement successful expanded learning opportunity programs, it is important to allow joint professional development for teachers and expanded learning time partners that work with the districts. This allows schools and providers to work together to ensure that students are receiving the support and specific interventions they need to succeed.

*Recommended language: In section 4601(b)(1)(C)(iv) insert “, other educators, and non-profit or community staff” after teachers.*

**Remove Cap on Renewals.** We agree that the check-in on grants at least every three years is an important way to improve program quality. However, limiting the renewal could hamper very successful programs from serving more children well.

*Recommended language: In sections:*

*4603(a)(8) strike “for an additional period of not more than two years”;*

*4603(a)(13)(A) strike “2-year”; and*

*4604(f) strike “of not more than 2 years”*

**Clarify Local Activities Section.** In section 4605(a), the language includes “before school, after school, summer learning, or expanded learning time activities” which we support. However, (a)(1) only authorizes funds for expanded learning time programs or initiatives.

*Recommended language: Either strike (1) or add after “initiatives” the following: “or high-quality before school, after school, or summer learning programs.”*

Thank you for your consideration of these recommendations. We would be happy to discuss them further with you at your convenience. Please contact me at [jdonner@tascorp.org](mailto:jdonner@tascorp.org), (646) 943-8738, if you have questions.

Sincerely,

A handwritten signature in cursive script that reads "Jessica Donner". The signature is written in a dark ink and is positioned to the left of the typed name.

Jessica Donner  
Director