



♥ Ensuring a Place at the Table for Every Family

November 13, 2017

Jennifer Bell-Ellwanger
U.S. Department of Education
Lyndon Baines Johnson (LBJ)
400 Maryland Avenue SW Room 6W231
Washington, DC 20202

RE: Docket ID ED-2017-OS-0078

Dear Ms. Bell-Ellwanger:

On behalf of the National Center for Parent Leadership, Advocacy, and Community Empowerment, we are submitting these comments in response to the Secretary's Proposed Supplemental Priorities and Definitions for Discretionary Grant Programs. National PLACE and our 45+ 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 meaningfully influence those decisions. National PLACE also believes that the most effective and efficient way to educate, engage, and empower families is through supporting family-led organizations whose primary commitment is to family empowerment and who bring the knowledge, skills, experiences, and expertise that only peers can bring to the work. We have reviewed the Secretary's proposed priorities for use in discretionary grant programs and the positions outlined below reflect these core values.

In general, we are concerned that the proposed priorities only 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, three times, and that these mentions appear only under Proposed Priority 1 – Empowering Families to Choose a High Quality Education that Meets their Child's Unique Needs, Proposed Priority 7 – Promoting Literacy, and Proposed Priority 9 – Promoting Economic Opportunity.

Further, National PLACE strongly believes that "school choice" is not equivalent to, nor does it necessarily lead to, more knowledgeable, skilled, and engaged families, nor does it necessarily lead to improved outcomes for our nation's children, especially those who face the greatest challenges and have the worst educational outcomes.

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 currently in place or available in the future along with support for the family-led organizations that have the capacity to inform and empower families, and technical assistance for those family organizations to ensure they remain strong and are effective.

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

Proposed Priority 1 – Empowering Families to Choose a High Quality Education that Meets their Child’s Unique Needs

“Choice” programs do not “empower” families nor are they equitably available to all families, and merely including a focus on students with disabilities, English learner students, migratory or homeless students, or other students at greatest risk, in the priority does not fully address this lack of equity in charter or voucher programs, or in traditional public schools where the vast majority of students still attend. “Empowering families” does not ensure that vouchers pay for the full cost of attending a “choice” school, or require that such schools accept all students including students with disabilities and English learners, or keep such schools from expelling or kicking out students they perceive as troublesome or “hard to teach,” or ensure that such schools provide high quality education (in fact, the research has shown that most charters do no better and in many cases worse than traditional public schools when you control for disability and other student characteristics), or address the fact that such schools are increasing racial segregation.

It should also be noted that “choice” schools are, in fact, less accountable to families and communities than traditional public schools. Most public schools are run by a school board that is elected by and accountable to the community. Residents have the right to be present at votes and debates, to access public documents about how their tax dollars are being spent, etc. This is not true of “choice” schools, which are typically run by executive boards or committees that are not accountable to parents. If parents are unhappy with what their local public school is doing, they can organize, vote for new leadership, or even run for the School Board themselves, options that are generally not available to parents in “choice” schools. Local taxpayers, many of whom are also parents, are the primary source of funding for public education, but in “choice” programs, they are denied any voice in the determining the educational standards and outcomes that are important to the residents in their communities.

Proposed Priority 2 – Promoting Innovation and Efficiency, Streamlining Education with an Increased Focus on Improving Student Outcomes, and Providing Increased Value to Students and Taxpayers

While National PLACE supports innovation, efficiency, improved student outcomes, and increased value to students and families (as opposed to taxpayers), the specific focus of the proposed priority on “reducing red tape and streamlining regulations” does not represent our perspective on how to best achieve these goals. Many of the existing regulations, all developed within the federal regulatory framework that provides for public review and input, are essential to ensure family involvement, educational equity, and protection of the rights of students. Many of these regulations are in place because of parent and parent organization advocacy, and National PLACE opposes their elimination.

Proposed Priority 3 – Fostering Flexible and Affordable Paths to Obtaining Knowledge and Skills

Proposed Priority 4 – Fostering Knowledge and Promoting the Development of Skills that Prepare Students to be Informed, Thoughtful, and Productive Individuals and Citizens

National PLACE believes that these priorities, 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 focus is missing from any of the priorities discussed in the above proposed priorities.

Proposed Priority 5 – Meeting the Unique Needs of Students and Children, Including those with Disabilities and/or Unique Gifts and Talents

National PLACE is particularly concerned that this proposed priority does not mention the word “parent,” “family,” or parent organization. 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. 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 does not reference this critical role of parents and parent organizations is troubling.

Proposed Priority 6 – Promoting Science, Technology, Engineering, and Math Education with a Particular Focus on Computer Science

National PLACE is pleased to see that the introduction to this priority includes information about the fact that 90% of parents surveyed by Gallup say they want computer science taught at their child’s school, as well as to see the focus in several sections of this priority on providing more equitable access to STEM education to underserved students. However, once again, there is no mention of the critical role of families in promoting and holding schools accountable for equitable access to high quality STEM programs.

Proposed Priority 7 – Promoting Literacy

National PLACE is pleased to see the recognition in this proposed priority that “Families play a critical role in supporting children’s literacy. When families and schools work together and support each other in their respective roles, children have a more positive attitude toward school and experience more school success.” National PLACE supports the priority of providing families with evidence-based strategies to promote literacy at home, but again notes that there is no mention of the other important ways that families must be engaged and supported, not just at their individual child level but at the school, district, state and national level, to impact literacy outcomes especially for students with the greatest challenges.

Proposed Priority 8 – Promoting Effective Instruction in Classrooms and Schools

National PLACE is concerned that professional development for educators and administrators to be able to partner more effectively with families, and the critical role of family-led/parent organizations to provide this professional development, is not mentioned as a key component of effective instruction.

Proposed Priority 10 – Encouraging Improved School Climate and Safer and More Respectful Interactions in a Positive and Safe Educational Environment

National PLACE is concerned that parents/families are not mentioned in this priority, particularly in the section discussing “developing positive learning environments that promote strong relationships among students, faculty and staff.” Families/parents must also be part of these relationships, and family-led organizations at the school, community/district, and state and national levels, must be involved in these efforts.

Proposed Priority 11 – Ensuring that Service Members, Veterans, and their Families Have Access to High Quality Educational Choices

Please see our comments on Proposed Priority 1, above.

In conclusion, we appreciate the opportunity to comment on the Secretary’s Proposed Priorities. We urge the Secretary to address and integrate the importance of informed and involved parent/family engagement throughout each and every priority. Further, we reiterate our comments made regarding the comprehensive review of regulations and guidance: 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 (Member organizations listed below)

Advocates for Children of NYC	Parent Education Advocacy Training Center
AFCAMP (Hartford, CT)	(PEATC) (Virginia)
Arkansas Waiver Association	Parent Education and Advocacy Leadership
ASK Resource Center (Iowa)	(PEAL Center) (Pennsylvania)
Association for Special Children and Families (NW New Jersey)	Parents Helping Parents (San Jose, California)
Connecticut Parent Advocacy Center (Connecticut)	Parent Network of Western NY (Buffalo)
Exceptional Children's Assistance Center (North Carolina)	Parents Let's Unite for Kids (Montana)
FACT Oregon (Oregon)	Parents Place of Maryland
Family Connection of South Carolina	Parents Reaching Out (New Mexico)
Family Matters PTI (Illinois)	Parent to Parent of Georgia (Georgia)
Family Network on Disabilities (Florida)	Parent to Parent of NJ (New Jersey)
Family Resource Center on Disabilities (Chicago Metro Area, Illinois)	Parent to Parent USA (National)
Family Soup (California)	PEAK Parent Center (Colorado)
Family Voices of California	Rhode Island Parent Information Network
Family Voices of New Jersey	Rowell Family Empowerment (California)
Family Voices of Wisconsin	SPAN (New Jersey)
Federation for Children with Special Needs (Massachusetts)	Starbridge (New York State)
FIRST Parent Center (North Carolina)	Support for Families (San Francisco, California)
Formed Families Forward (Virginia)	Washington PAVE
INCLUDEnyc (New York City)	West Virginia Parent Training & Information
Long Island Advocacy Center (Long Island, New York)	Wisconsin FACETS
Louisiana PTI	Wyoming Parent Information Center
Maryland Coalition of Families	
Matrix Parents (California)	
National Federation of Families for Children's Mental Health (National)	
Open Doors for Multicultural Families (Washington)	
Parents CAN – Napa Valley Child Advocacy Network (California)	