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Public Comment on Proposed Priorities, Requirement, Definitions, and Selection  
Criteria-Full-Service Community Schools Program  
Docket ID ED-2021-OESE-0152

The **California Community Schools Learning Exchange (CSLX)** works in partnership with practitioners, researchers, and policy-influencers to strengthen high quality implementation of whole child approaches to teaching and learning. California has placed a big bet on community schools, with its \$2.8 billion investment in the CA Community Schools Partnership Program grant program (CCSPP) – especially important as we confront the education equity challenges that have been further exacerbated by the COVID-19 pandemic.

This massive influx of state funding to seed, strengthen, and scale community school approaches across the state demands that we work together to more accurately describe the nuances of community schools implementation, what needs to be in place in order to ensure efficacy, and how to best evaluate and strengthen community school efforts.

The community schools work in California can be further strengthened by intentional alignment with US ED’s Full Service Community School (FSCS) grant program. As such, we are pleased to offer the following public comment on the [Proposed Priorities, Requirement, Definitions, and Selection Criteria-Full-Service Community Schools Program](#), based on the decades of community schools expertise and experiences of educators and partners across our state.

**General Comments**

***Effective Community Schools take a Developmental Approach to Trust and Transformation***

Community schools development may not always be linear or forward moving. Collaborative efforts can advance and then slip back depending on a myriad of factors (e.g., leadership turnover, lack of funding adequacy or sustainability, shifting political support), or can be further ahead in one area of the work than in another. We appreciate that the Department acknowledges that community schools implementation takes time and evolves and matures through different stages of development (see:

[https://www.nccs.org/wp-content/uploads/2021/10/NCCS\\_BuildingCommunitySchools.pdf](https://www.nccs.org/wp-content/uploads/2021/10/NCCS_BuildingCommunitySchools.pdf)). We must be realistic and supportive about the trajectory of development and maturity of community



school strategies – particularly in education contexts that are often volatile, uncertain, chaotic and ambiguous (see:

<https://edpolicyinca.org/publications/continuous-improvement-schools-covid-19-context>).

Districts undertaking systems transformation must define their first steps **based on existing areas of strength, collaboration, and innovation**, not by the requirements of an external grant program. Trust must be cultivated and renewed such that educators, leaders, and partners can deepen and mature their community school and improvement work. Expecting maturity and “fidelity” to a predetermined model, or a formulaic approach to scale community schools is misconceived.

### ***Readiness Matters: Enabling Conditions and Capacities for Improvement***

It is also important to consider the foundational steps of building “readiness” of schools and consortium partners to engage in community schools work – at the local, district, region, and state levels. Schools and systems engaged in continuous improvement work can enable conditions and capacities necessary to engage in systemic, transformational work. That is, effective implementation requires, as described by Myung et al. (2020), “structures, practices, cultures, and capacities that are often in contrast to traditional school improvement strategies, which have prioritized scaling ideas quickly or presenting top-down mandates.” Specifically, improvement literature and the experiences of improvement professionals points to four general organizational conditions of improvement systems: (a) shared purpose, (b) culture of mutual trust, (c) structures and resources that foster collaborative work, and (d) preparation and mobilization of improvement capacities (see:

[https://edpolicyinca.org/sites/default/files/2020-09/r\\_myung\\_sep2020.pdf](https://edpolicyinca.org/sites/default/files/2020-09/r_myung_sep2020.pdf)).

We did not see language addressing readiness and/or enabling conditions and capacities in the US ED community school program priorities. The federal community schools program would be strengthened by an application and/or planning process that supports districts to assess their own readiness conditions, as well as ongoing implementation assistance to support districts build out community school strategies based on areas of strength and need.

### ***Teaching Impacts Learning***

Earlier iterations of community schools focused primarily on responding to a student’s external environment in their attempts to address achievement and opportunity gaps. By securing and delivering student services and “removing barriers to learning,” schools looked to outside resources (e.g., expanded learning opportunities, student and family services) to “fix” or patch already stressed school systems. Concepts of “collaboration” and “integration” referred more to opening the doors to the school to allow services to come in. Rarely did this extend to opening the doors to the classroom, and re-considering how teaching and learning systems and environments must change.



There is mixed evidence that integrated student supports have an effect on student learning outcomes. If the goal is to impact academic outcomes, it is important to explicitly name the role of teaching in community schools. Effective community schools do not just remove external environmental barriers to school success by providing services or establishing collaborative decision-making structures. They concurrently examine and reform the underlying internal classroom, school and district behaviors that get in the way of student-centered collaboration, partnership, and teaching. As our colleagues at the Learning Policy Institute and The Opportunity Institute write: “a good student support system cannot compensate for a weak core instructional program that is not responsive to individual student development and learning needs (including social, emotional, and cognitive).” (see: [https://learningpolicyinstitute.org/sites/default/files/product-files/CA\\_Community\\_Schools\\_Partnership\\_Program\\_BRIEF.pdf](https://learningpolicyinstitute.org/sites/default/files/product-files/CA_Community_Schools_Partnership_Program_BRIEF.pdf)) Community school pedagogy must be grounded in inquiry based learning, and be culturally affirming, linguistically sustaining and connected to students’ lived experiences.

Community schools must do more than deliver services, they must also:

- (1) Center relationships between and among families, students, and educators;
- (2) Understand whole child needs;
- (3) Strengthen staffing and deepen community-based partnerships to address students’ individualized learning and mental health needs;
- (4) Prioritize racial equity, relevance, and rigor in curriculum and instruction; and
- (5) Lay the groundwork for systemic transformation.

(see <https://www.edpolicyinca.org/publications/restorative-restart>)

### ***Collaboration Demands a Comprehensive Culture and System of Distributed Leadership***

As referenced in the notice of proposed priorities, community school efforts are often staffed by a full-time community school coordinator who is presumed to be primarily responsible for partner management and integration. However, assuming that collaborative leadership and practices happen in community schools because of one staff position is unrealistic and misleading at best. Schools and student- and family-serving organizations have historically operated independently, each focused on their own performance. Overcoming biases for the status quo and inclinations for working in silos will require transformative mindset and culture shifts. For these organizations to work together as a system “requires a clear understanding of the goal of the overall system, as well of interactions among the subsystems. The whole must be recognized as being greater than the sum of its parts.” (see: <https://pubmed.ncbi.nlm.nih.gov/20669457/>) .

Technical aspects of community schools – such as collaborative, decision-making structures – will not live up to their potential without attention to the adaptive and relational dimensions of



collaborative leadership. This means, in addition to having structures and practices to facilitate and encourage collaboration and collective learning (e.g., protected time and norms, deliberate work across departments and disciplines, shared data infrastructure), community schools must invest in developing school, district and community leaders that cultivate partnership, demonstrate vulnerability, seek feedback, and apply disciplined inquiry methods to test ideas and learn from failures. In addition, school and system leaders must be supported to “share” their traditional positional authority with students, families, and community stakeholders. Such professional norms are not characteristic of education systems, and most districts do not have policies in place to support these practices. A strong CS program would explicitly name some of these capacities for collaboration and support LEAs to strengthen policy, culture, and practices that create a culture of trust and collaboration. Skillful engagement with technical assistance and communities of practice are one lever to support these culture and practice shifts.

### ***Technical Assistance is a Crucial Investment in Inquiry and Collective Learning***

Although community school strategies have a long history, the field is still nascent as reflected by the lack of widely adopted standards to support implementation and evaluation, especially across varied contexts. By recognizing that the work is relatively nascent, US ED’s proposed investments in technical assistance are critical to providing guidance and support to new entrants. It is essential, however, that technical assistance reflects the best knowledge of practitioners and field experts, rather than academic or research “experts.” Community schools development is complex and multi-faceted. It does not follow a four-point plan for implementation. US ED’s technical assistance should explicitly—in both delivery design/engagement and content—center practitioner voice and experience. An example of this is the Coalition for Community School’s Implementation Standards (see:

<https://www.communityschools.org/wp-content/uploads/sites/2/2021/03/Community-School-Standards-Updatesd2017.pdf>), developed out of a two year engagement process with practitioners

across the country, consolidating lessons learned into a shared language and set of practices to support strong implementation. Along these lines, CSLX has undertaken a practitioner engagement process in California to engage with with community school students, families, teachers, administrators, and partners in order to:

- **Describe the key elements and features of community schools implementation** in California including how schools and communities can align and leverage existing policy and programmatic investments (e.g., Local Control Funding Formula/Local Control Accountability Plans, Multi-Tiered Systems of Support, Linked Learning);
- **Identify and illustrate the diversity of difference approaches to community school implementation and practice**, including areas of commonality and areas of difference;
- **Solidify a practitioner knowledge base for practical implementation guidance** that is in alignment with the state’s emerging community schools framework, as part of the CA Community Schools Partnership Program. The state’s framework is intended to provide



basic “guardrails” on implementation; the field will still require depth of implementation nuance and guidance.

- **Design opportunities for learning, knowledge-exchange, and field-building** that reflect the way students, families, teachers, administrators, partners, and other community school practitioners actually work and learn together.

Centering practitioner experience and knowledge in US ED’s technical assistance will be critical to both supporting individual grantees’ efforts, as well as building the field’s collective (and inclusive) wisdom.

### **Specific Comments**

#### ***Proposed Priority 1—Capacity Building and Development Grants***

Decades of community schools implementation and lessons learned affirm that capacity building and development are non-negotiable features of supporting and scaling community schools work. Capacity building work must elevate the structural and strategic leadership aspects of community schools, but also must model opportunities for continuous improvement at all stages of community school implementation. That is, supporting grantees to reflect on their implementation priorities, areas for refinement and course correction, and the evidence (including perspectives of students, families, community) that they will use to guide their improvement process. Ongoing documentation and synthesis of lessons learned through community school implementation efforts will not only support reflection and continuous improvement but also benefit the field at large.

#### ***Proposed Priority 2—Multi-Local Educational Agency Grants***

We are in full support of proposed priority 2. CSLX has been working with the CA Small School Districts Association (SSDA) on community schools implementation, and *Priority 2* is essential for small and/ or rural districts and charters. It is vitally important that the Department explicitly address and support the present and perennial realities of small and rural districts and charters. Traditional competitive grant processes historically have excluded small LEAs, who do not have capacity or infrastructure to respond to grant application and implementation requirements. Community schools present a unique opportunity to capitalize on, and learn from the relational infrastructures and collaborative work that is structurally innate in small and rural schools. For example, our colleagues in Maple Elementary School District, in Shafter, CA, serving under 300 students, were able to partner with two neighboring small rural districts to apply for CCSPP funding, which they received. Together, the districts established a joint-community Children’s Cabinet, focused on five shared priority areas. Using CCSPP funding, along with other shared and braided streams, they have dramatically expanded available resources, (e.g. a shared school psychologists and social workers). Alone, neither district could have qualified for and/or sustained their CCSPP-funded efforts. Being able to work as part of a multi-LEA grant program will help LEAs who might not otherwise undertake this work on their own.



#### ***Proposed Priority 4—Participation in the National Evaluation***

While a robust, rigorous evaluation of community school is essential to learning what does and does not work, we caution the Department not to prematurely rely on randomized controlled trial (RCT) methodologies and design. RCTs are most appropriate when addressing questions related to efficacy (performance under ideal and controlled circumstances) or effectiveness (performance under “real-world” conditions). To that end, hypotheses that are best tested using RCT have a clear and explicit theory of change, a comprehensive accounting of inputs (including environmental conditions, what is considered “control,” and what is considered “treatment”), and identification of outcomes that are in alignment with the named inputs and the theory of change.

At the current moment, the community school field is working to address these essential questions – e.g., theory of change, inputs, outcomes. For example, one of the goals of the *Community Schools Forward* national task force is to foster increased cohesion around core community schools definitions, concepts, frameworks and outcomes. An evaluation that does not reflect this important field consensus work, nor includes methodological tools that adequately capture the theory of action is premature and we strongly advise against it.

In addition, the expansion of the FSCS grant program is a valuable opportunity to introduce and support new entrants into the community schools work. With the recognition that this work is developmental and takes time, we encourage the Department to be explicit about how an RCT on novice and emerging practice would appropriately and reliably measure the effect size of the intervention. At this moment in the development of community schools, any evaluation needs to be in service of strengthening practice – not picking winners and losers. If an RCT is able to test specific variables of the intervention – that can be disentangled and/or controlled – it would be valuable information to guide future iterations of the work. To that end, we encourage the Department to review the funded evaluations (and their methodologies) from the Office of Education Innovation and Research (see:

<https://oese.ed.gov/offices/office-of-discretionary-grants-support-services/innovation-early-learning/education-innovation-and-research-eir/>) which includes rigorous mixed-methods studies that account for complex, developmental implementation of education innovations.

Lastly, the types of data that are included in an evaluation matter. It is essential that evaluation methodologies consider the baseline inputs and attributes of the school community, including percentages of highly-qualified teachers, rates of teacher and principal retention, levels of district and school stability, and community health and wellbeing (see [www.KidsData.org](http://www.KidsData.org)). And at minimum, any evaluation of a community school strategy must include the experiences and perspectives of students, families, teachers, and community partners; any study that does not account for the experiences of stakeholders and the relationships therein would be insufficient and antithetical to the intervention itself. Survey data that is specific to community school



implementation can be used to triangulate other data measures of school quality, climate, and student well-being, e.g., CASEL’s social-emotional learning assessment (see: <https://casel.org/state-resource-center/assessment-tools/>), and the Chicago Consortium’s Five Essentials Surveys (see: <https://consortium.uchicago.edu/surveys#researchAreas>).

### ***Proposed Priority 5—Evidence-Based Integrated Student Supports***

We presume that US ED’s specification of Evidence-Based Integrated Student Supports is intended to emphasize the centrality of those programmatic interventions as part of a community school. While student supports are one common programmatic and structural component of community school strategy, the lack of additional named features as priorities signals a gap in understanding of a community school theory of action. For example, the community school competencies that are noted as part of the Oakland Unified School District model (e.g., comprehensiveness, collaboration, coherence, and commitment) are not limited to the integrated student support services. These competencies are in service of the culture, practice, and policy shifts that are essential to meaningful school transformation. An overemphasis on integrated student supports risks misrepresenting and reducing the work of community schools to an “add on” of programs, rather than a transformation of the structures, systems, and practices of schooling. See <https://www.hepg.org/hep-home/books/the-way-we-do-school> for an in-depth discussion of the systems- and culture-change entailed within long-term sustainable community schools work.

### **Proposed Requirements**

Among the “pillar” outlined in statute, the “collaborative leadership and practices that build a culture of professional learning, collective trust, and shared responsibility” is incongruent with the others in that it is not a programmatic effort, but rather speaks to an overarching leadership and culture of a school community and its stakeholders. It is vitally important that applicants are able to articulate the ways in which the collaborative leadership “pillar” is infused throughout their work, as opposed to a specific programmatic component – see comments above re: *Priority 5*.

Quality implementation of any school reform effort requires focus and coherence. The development and evolution of a successful community school strategy is rooted in that premise. We encourage schools and districts to start “where they are,” and build their community schools muscles in an area that is most accessible and reflects a community priority. Requiring applicants to address all four pillars as outlined in statute short circuits that developmental approach and runs counter to the research on sustaining school improvement and seeing impact on student learning (see: Reeves, D. B., 2015, Teacher College Press. *Finding your leadership focus: What matters most for student results*). Instead, applicants should be encouraged to describe their strategic growth and approach to cumulatively deepening work across programmatic areas.



While US ED recognizes the need to more clearly represent connection to the classroom, such implications for instructional shifts are not represented in the “pillars.” Applicants, in describing their approach and specific “pillars”, should include an explicit theory of action that illustrates how community school strategies include teachers, curriculum, pedagogy, continuous improvement, and professional learning so that they impact teaching and learning as explicit goals. Additionally, the connection to traditionally excluded learners (e.g., English language learners, students with disabilities) should also be made explicit.

### **Proposed Definitions**

The proposed definitions in the notice of priorities were intended to clarify expectations for eligible entities applying for FSCS program grants. Our concerns about the limiting and insufficient basis for implementation narrowly prescribed by the “four pillars” is captured above in the comments regarding *Priority 5* and *Proposed Requirements*.

It is important to also flag that while there is mention of a “community school coordinator” throughout the notice of priorities, there is not an explicit definition of the role, especially beyond describing their role to conduct need and assets mapping, and to integrate student supports. While successful community schools *do* and *must* have dedicated staff to support collaboration processes and systems, the work of community schools must be shouldered by more than just the coordinator. As such, it is important for applicants to describe the ways in which community school coordinators have the authority and responsibility of high level school administrators, and how other leadership roles – e.g., principals, assistant principals – will work systematically to support integration and relevance across school efforts. The FSCS grant program can’t “require” leadership dispositions – but should signal that the work of partnership is not something to be outsourced; it must be modeled and embedded throughout leadership roles in the school and community.

Similar to our comment under *Priority 2*, it is important to again emphasize the varying feasibility of districts and schools to seed and sustain community schools infrastructure. In some communities a full-time coordinator may not be feasible. In those contexts, applicants should clearly articulate a plan for having a dedicated staff person and/or team to accomplish the goals across LEAs.

### **Conclusion**

On behalf of the CA Community Schools Learning Exchange and our partner organizations signed below, we greatly appreciate the opportunity to submit our comments and look forward to continuing our work so that all schools can be community schools.



Respectfully,

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