



May 25, 2016

U.S. Department of Education  
Office of Elementary and Secondary Education  
400 Maryland Ave. SW  
Washington, DC 20202

**RE: Request for Feedback: ESSA Guidance**

To Whom It May Concern:

We write today on behalf of Communities In Schools (CIS), a national network of trained professionals working in public schools to surround students with a community of support, empowering them to stay in school and achieve in life. CIS serves nearly 1.5 million students in almost 2,300 schools and nearly 400 school districts, helping to break the cycle of poverty by both increasing graduation rates and reducing dropout rates.

Thank you for this opportunity to provide input and recommendations about which areas within the Every Student Succeeds Act (ESSA) may benefit from non-regulatory guidance. CIS strongly urges the Department of Education to consider guidance to clarify the following:

- that states and districts may use ESSA funds, particularly Title I funds, for evidence-based supports and improvements, including Integrated Student Supports (ISS);
- the definition of ISS, and the ways that schools can utilize ISS to address inequities, reduce chronic absenteeism, increase graduation rates, and achieve other positive outcomes;
- the qualifications of an evidenced-based intervention.

Included with our comments is a March letter from Democratic Leader Harry Reid urging guidance in these areas.

**Funding ISS under ESSA**

While CIS currently reaches 1.5 million students, we know that approximately 11 million students living in poverty go without needed supports each and every day. We must collectively do better at addressing the non-academic barriers that make it difficult for these students to learn. Guidance from the Department clarifying that schools, districts, and states may use federal funds for non-academic student supports is a necessary first step toward ensuring that more in-need students receive services.

Before ESSA, many schools, districts, and states used federal dollars (including Title I, Part A dollars) for support strategies like ISS. Other schools, districts, and states explored the use of federal funding (particularly Title I, Part A dollars) for this purpose, but conflicting state-by-state interpretations of the statute, coupled with a lack of clear departmental guidance, either

discouraged, or at times even prevented, these entities from moving forward. For instance, in 2012, the Georgia Department of Education ruled that CIS was not an allowable expense under Title I, Part A on the grounds that Title I funding must only be used for activities directly related to academic instruction. Other districts and schools are somewhat hesitant to use Title I funds for this purpose simply due to a lack of clarity from the federal government.

Thanks to ESSA, the ISS strategy is now a recognized part of the nation's landmark K-12 education statute, the Elementary and Secondary Education Act of 1965. While not explicitly defined, ISS is called out directly in—

- Sec. 1115(e)(2)(B)(iv)
- Sec. 4001(b)
- Sec. 4622(3)

—or can be read to be referenced indirectly within:

**SCHOOL IMPROVEMENT**—Sec. 1003(b)(B): *“may, with the approval of the local educational agency, directly provide for these activities or arrange for their provision through other entities such as school support teams, educational service agencies, or nonprofit or for-profit external providers with expertise in using evidence-based strategies to improve student achievement, instruction, and schools;”*

**SCHOOLWIDE PROGRAMS**—Sec. 1114(d): *“The services of a schoolwide program under this section may be delivered by nonprofit or for-profit external providers with expertise in using evidence-based or other effective strategies to improve student achievement.”*

**SCHOOLWIDE PROGRAMS**—Sec. 1114(b)(7)(A)(iii)(I): *“counseling, school-based mental health programs, specialized instructional support services, mentoring services, and other strategies to improve students’ skills outside the academic subject areas;”*

**TARGETED ASSISTANCE SCHOOLS**—Sec. 1115(b)(2)(F): *“if appropriate and applicable, coordinating and integrating Federal, State, and local services and programs, such as programs supported under this Act, violence prevention programs, nutrition programs, housing programs, Head Start programs, adult education programs, career and technical education programs, and comprehensive support and improvement activities or targeted support and improvement activities under section 1111(d);”*

**ACTIVITIES TO SUPPORT SAFE AND HEALTHY STUDENTS**—Sec. 4108(5)(C)(vi) and (vii): *“(vi) establish or improve school dropout and reentry programs; or (vii) establish learning environments and enhance students’ effective learning skills that are essential for school readiness and academic success, such as by providing integrated systems of student and family supports;”*

**PROMISE NEIGHBORHOODS**—Sec. 4624(d)(2): *“implement the pipeline services;”*

**FULL-SERVICE COMMUNITY SCHOOLS**—Sec. 4625(e)(2) and (3): *“(2) to the extent practicable, integrate multiple pipeline services into a comprehensive, coordinated continuum*

*to achieve the annual measurable performance objectives and outcomes under subsection (a)(4)(C) to meet the holistic needs of children; and (3) if applicable, coordinate and integrate services provided by community-based organizations and government agencies with services provided by specialized instructional support personnel.”*

It is critical that the Department underscore the allowable use of the highlighted federal funding streams for non-academic support strategies, like ISS. For the first time in our nation's history, the majority of students in public schools are low-income. In a national poll of public school teachers, 88 percent said that poverty is the number one barrier to learning. Evidence-based models, like ISS, address these systemic barriers to learning, reduce dropouts, increase achievement, and champion community engagement by allowing teachers to teach and students to learn.

### **Define Integrated Student Supports**

It is important for the Department to further clarify the term “Integrated Student Supports” and provide states, districts, and schools with research on evidence-based ISS strategies. Specifically, the Department should clarify that the ISS strategy is a school-based approach that promotes students’ academic success by developing or securing and coordinating supports that target academic and non-academic barriers to achievement.

These resources range from traditional tutoring and mentoring to provision of a broader set of supports, such as linking students to physical and mental health care and connecting their families to adult education services, family counseling, food banks, or employment assistance. Integration is the key to incorporating the ISS program into the life of a school.

Per a February 2014 report from Child Trends<sup>2</sup>:

*Research in child and youth development clearly indicates that success in school (and in life) is more likely when young people’s well-being is met across multiple domains—in other words, when their health, safety, social/emotional, and cognitive needs are consistently met. Yet this fundamental principle is not central to many education discussions today. Education reform has largely focused on academic factors (improving teacher quality, strengthening curricula, school choice, etc.) and assessments of students’ needs and strengths have been largely limited to academic measures. An integrated student supports approach offers an opportunity to broaden the focus of education initiatives and funding, recognizing that student success is driven by multiple academic and non-academic factors.*

While individual ISS programs vary somewhat in the ways they provide supports, most providers employ common components such as needs assessment, integration within schools, community partnerships, coordinated supports, and data tracking, and all embrace the premise that academic outcomes are a result of both academic and non-academic factors. Communities In Schools, for instance, takes a holistic approach to addressing both the academic and non-academic needs of students. Working in partnership with school staff, CIS site coordinators—who are positioned in schools—identify students in danger of dropping out, assess what they need, and then provide services through appropriate community partnerships.

## **Define Evidenced-Based Intervention**

One of the most significant shifts in ESSA is the commitment to the use of evidence to drive better outcomes for students. Implemented well, these evidence provisions can both improve student outcomes and increase the return on federal education investments by directing resources toward the programs and practices most likely to have a positive impact.

To ensure fidelity to this standard, the Department should clarify definitions of the first three levels of evidence. For example, the Department could define which measures qualify for the evaluation under each level. The Department should provide quality criteria for determining whether an underlying study is “well-designed and well-implemented” as required by ESSA’s definition.

The Department and IES should find ways to help users leverage the What Works Clearinghouse to find programs and practices that align with ESSA’s evidence-levels. However, the Department should make clear that the WWC represents a non-exhaustive list of qualifying evidenced-based interventions, since IES does not have the capacity to review every experimental, quasi-experimental, or correlational study.

The Department should also clarify that federal funds may be used for evaluations that either strengthen the support for an evidence-based intervention or build sufficient evidence to move an intervention out of the fourth level and into one of the top three levels. Although ESSA does not prohibit such a use, a clear affirmative statement to states and districts can have an outsized impact on their willingness and ability to allocate some federal funds for this critical purpose.

CIS is one of the 10 models that contribute to a growing evidence base for ISS. Thirteen independent evaluations of CIS have found that it has a positive impact on student outcomes. Importantly, those CIS schools implementing the model with a high degree of fidelity had the greater effect. Lack of clarity about the importance of implementation could result in confusion among states and districts about what comprises effective use of this model. Even worse, it could result in few low-income students getting the supports they need to be successful in school and life.

The Department should also consider circulating the 2014 Child Trends report, *Making the Grade: Assessing the Evidence for Integrated Student Supports*, as a resource for school, district, and state leaders. The comprehensive report includes research around ISS and examples from the 10 evidence-based models.

I’d like to close with a statement made by NEA President Lily Eskelsen Garcia at a recent Senate HELP Committee hearing on ESSA implementation:

“The best teaching assignment I ever had was the Salt Lake homeless shelter. Because the support that I had, as the teacher that the district placed there ... there were social workers that worked with the family, there was a health clinic, there was a dentist that came in every two weeks, the nutrition programs that they had. I was never alone. I had the support I needed as the professional ... [people] who could deal with mental health issues that a family may have. So I understand when you

say ... every school needs the technology, the textbooks, the facility, the stuff. **But you also need to deal with the reality of that child's life, and some children come to us with so many more needs that aren't met in their home or community.** They come from homes where they don't have disposable income to take a child to the dentist. So that child walks into our classroom in pain, and we have to do something about it, whether we have the resources to do anything or not. So for me, it is more than just counting the dollars. The dollars are important, but you also have to say, how creative can I be in seeing what kind of services and supports, what kind of community organizations may be out there to help me."

We appreciate the opportunity to submit these comments. We respectfully request a meeting with your office to discuss this letter. Our Vice President of Government Relations, Tiffany Miller, will be in touch to schedule a meeting at your earliest convenience. Should you have any immediate questions, please contact Tiffany at [millert@cisnet.org](mailto:millert@cisnet.org) or at 703-518-2557.

Sincerely,



Debra Montanino  
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# United States Senate

WASHINGTON, DC 20510-7020

March 15, 2016

The Honorable John King  
Secretary  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202

Dear Secretary King:

As you move forward with implementation of the Every Student Succeeds Act (ESSA), I would encourage you to consider issuing guidance that makes clear that school districts are permitted to use Titles I and IV funding for integrated student supports and other evidence-based improvement strategies. I further ask that you work to educate states and districts on the ways schools, post-ESSA, are able to utilize these supports to increase retention and improve academic achievement.

As you know, integrated student supports promote success through a school-based approach that targets both academic and non-academic barriers to learning, and identifies those students who may be at risk of falling through the cracks. Interventions range from traditional academic assistance, counseling, and mentoring, to a broader set of supports, such as linking students to physical and mental health care.

Through ESSA, Congress highlighted the integrated student supports model, and allowed states, districts, and schools to use their Titles I and IV funding for this purpose. ESSA empowers local decision-making, and encourages schools to partner with local, community-based organizations when developing their state and local accountability plans and needs assessments.

I have seen what integrated student supports and other evidence-based improvement strategies have done for schools and students in Nevada. ESSA holds the potential to expand this model and advance similar strategies that reduce obstacles to improving student achievement.

I am hopeful that the Department can provide much-needed guidance on this topic so states, districts, and schools will no longer be discouraged from using their federal funding for this purpose should they choose to do so.

Thank you for your prompt attention to this matter.

Sincerely,



HARRY REID  
United States Senator