



Good afternoon and thank you for this opportunity. I am Kathy Lally, Vice President of Growth & Impact at Communities In Schools.

Communities In Schools (CIS) is the nation's largest and most effective dropout prevention organization. Operating in more than 2,400 schools in the most challenged communities of 25 states and the District of Columbia, Communities In Schools serves nearly 1.5 million young people and their families each year. Communities In Schools' unique model positions site coordinators inside schools to meet the needs of the whole child by assessing their needs and providing them resources that will help them stay in school and succeed in life. We partner with 400 school districts and 17,000 partners like local businesses, social service agencies, and health care providers to mobilize 40,000 volunteers. Whether it's providing food, school supplies, health care, counseling, academic assistance or a positive role model, Communities In Schools is there to help. This local and school-based approach has been proven effective at removing academic and non-academic barriers to student achievement by increasing graduation rates, lowering dropout rates, increasing academic achievement, and increasing attendance.

Communities In Schools is excited about the opportunities in ESSA for evidence based practice and integrated student supports. We would like to provide the department with two recommendations regarding Title I.

Congress deliberately designed ESSA to include opportunities for states and districts to promote academic success and discourage student dropouts by developing, securing, and coordinating supports that target academic and non-academic barriers to achievement.

1. ESSA explicitly allows states and districts to use Title I dollars on integrated student supports and other evidence-based improvement strategies.



- o Previous iterations of the Elementary and Secondary Education Act lacked clarification with regard to Title I and student supports, creating conflicting interpretations that discouraged LEAs and SEAs from attempting to use Title I dollars for ISS activities.
 - o CIS encourages the Department to circulate guidance clarifying that LEAs and SEAs are permitted to use Title I dollars for these activities.
 - o Furthermore, the Department should work to educate LEAs and SEAs on how ESSA provides opportunities for the use of integrated student supports, and furthers the community schools model.
2. The Department should refrain from issuing guidance or regulation that has the effect of taking stewardship of Title I funding away from states and districts.
- o States and districts must be allowed to utilize the student support strategies that they view as working best for their students, including those that reduce systemic obstacles to learning and provide a holistic approach to K-12 education.
 - o With that in mind, we urge the Department to tread carefully when considering regulation or guidance that may undermine local flexibility and prevent states and districts from using Title I dollars as they deem fit.

On behalf of the 200 local and state CIS organizations, the 1.5 million students we serve, and the 9 million additional students in poverty who will benefit from these modifications in ESSA, Thank you again for this opportunity