



January 25, 2022

Comments on IES Statewide Family Engagement Center (SFEC) Study

Submitted via regulations.gov

Comments re: IES Statewide Family Engagement Center Study

I am writing on behalf of the National Center for Parent Leadership, Advocacy, and Community Empowerment (National PLACE) with regard to the Institute for Education Sciences' proposed study on the implementation and impact of Statewide Family Engagement Centers. National PLACE's mission is to strengthen the voice of families and family-led organizations at decision-making tables at all levels. As a national, family-led organization with 70 national, state, and local family-led organization members including Parent Centers, Family to Family Health Information Centers, Federation of Families for Children's Mental Health chapters, and Parent to Parent USA affiliates, among others, we provide information and support to our members to assist them to support families of children and youth to access critical services, including education services, and in empowering parents to be more impactful, informed, meaningful partners in the education of their own children and in systems improvement.

Comments on the Supporting Statements

Part A: National PLACE supports the 4 research questions in Part A: to what extent do grantee activities reflect the program objectives, including direct services to LEAs and families (except that we would rename "direct services" as noted in our survey and interview comments, below); what factors do grantees find most important in deciding which activities to provide; to what extent do grantees focus on serving disadvantaged populations; and what are grantees' key challenges in meeting the grant objectives. However, in addition to surveying and interviewing the SFEC Director and SEA, National PLACE would also recommend surveying and interviewing a sampling of Special Advisory Council members, including parents, community-based organizations, and other partners. Their perspectives are critical to understanding the success – or lack thereof – of Statewide Family Engagement Centers.

Part B: We would recommend adding the sampling of Special Advisory Council members, see above.

SFEC Director Survey Protocol Comments

- **Technical assistance and infrastructure building activities**, as defined in this survey, are activities that require the recipient to reach out to access the service, as opposed to being actively recruited to participate in the service. In general, these services are broadly disseminated so that a potentially unlimited number of recipients may obtain access. They may also require a time-limited amount of effort by the SFEC because the materials, once created, do

not need to be repeated or tailored to multiple audiences. Some common examples of these activities include large conferences that any interested parties may attend, resources on websites, webinars, framework implementation guides, meetings with partner networks, and communities of practice.

This definition is not consistent with our experience in technical assistance or infrastructure building activities including communities of practice. Communities of practice often include members who are actively recruited to participate in the service, and further, once created, the CoPs still need ongoing support and tailoring to multiple audiences. Further, true infrastructure building activities are not time-limited. We agree that large conferences that any interested parties may attend, resources on websites, and framework implementation guides are generally time-limited. As a member organization of family-led, family-serving organizations, that provides TA and infrastructure building activities to our members, I would not say that this definition is consistent with my understanding of TA or infrastructure building. Nor is it consistent with the US Department of Education's own description of what "technical assistance" means; that definition includes three tiers – universal (which is what this paragraph is allegedly discussing), targeted, and intensive. National PLACE recommends (a) a different title for the description of "time-limited amount of effort," and (b) reconsideration of what time-limited activities would be included here. Perhaps this could be redefined as Universal TA, and not include CoPs or even conferences.

- **Direct services**, as defined in this survey, are services that require both SFECs to actively recruit participation as well as recipients (families, schools, LEAs) to accept involvement. These services are not broadly disseminated but rather provided to a targeted set of recipients, with limited SEA assistance, to families, schools, and LEAs. The goal of direct services is to intensively support families, schools, and LEAs in enhancing their engagement within the context of specific, identified needs to improve student achievement and behaviors for school success. These activities may be time-intensive for the SFEC because they include, for example, face-to-face or virtual interactive parent communities; intensive trainings for school and LEA leaders, teams, and educators to implement specific family engagement interventions or strategies (such as supporting families in guiding homework); home visits to families; and training parents in family literacy. Direct services typically require more active engagement by the SFEC and customers than does technical assistance.

National PLACE recommends that the title of this paragraph be revised, perhaps to Targeted and Intensive TA. Direct services are more often interpreted as meaning direct educational services, related services, etc. We would also recommend adding conferences and communities of practice to this paragraph focused on more targeted and intensive TA.

These changes would also impact the headings for the survey questions themselves, as well as where some of the questions are listed. For example, providing the infrastructure to support greater collaboration on family engagement topics, should be moved to the Targeted & Intensive TA category.

We support the questions listed under Direct Services but would rename that category, Targeted & Intensive TA.

For the question related to providing services to families to support parent well-being (e.g., providing adult education services, financial education training, parenting classes), we would recommend adding "peer/parent to parent support" which is a significant service to families that supports parent well-being everywhere that topic is an option.

For the question related to conducting training for schools or districts to encourage family leadership to advocate for children or understanding the school or district system, we would recommend adding “and to encourage shared/participatory leadership,” such as that involved in the former IDEA Partnership’s Leading by Convening model/approach to meaningful stakeholder involvement.

For the question in RQ1.3, we would recommend taking out “educational choice” in the listing.

In the list of topics under question A5, we would recommend moving l, Social-Emotional Learning/Social-Emotional Development, which is a high priority topic, up on the list. Also for topic f, Family-school communication and engagement around academic achievement, we would recommend either adding “and social-emotional development,” or adding this as a separate topic (family-school communication and engagement around social-emotional development.”).

If you keep i, focused on engaging families of students with disabilities as a special group, we would recommend adding engaging families with LEP, families of color, and immigrant families as special groups in the same way.

Most of the questions listed under A8 are not really about educational choice, rather, they are about school accountability. While we would recommend eliminating the “educational choice” language completely, if that is not possible, we would recommend changing it to “educational choice and school accountability.”

In A9 we would recommend adding Strengthening Families as well as the CDC’s Whole School, Whole Child, Whole Family (formerly Coordinated School Health model).

For A12, we would recommend adding, “Collaboration with other family education and engagement organizations such as Parent Centers.” (We note that the competition requires grantees to partner with the Parent Center(s) in their state, and yet many of the current grantees have NOT even reached out to the Parent Center(s) in their state. There should be a specific question asked about this fundamental component of the application requirements.)

We strongly support including the questions in A14 as these are often barriers.

In B1 and C3, we would add families of children in the juvenile justice system, families with limited literacy (even though they are English speakers), and families where the parents themselves have disabilities.

We recommend explicitly adding Parent Centers to the list in C4b.

SFEC Director Interview Protocol Comments

We would recommend changing the title, Technical Assistance and Infrastructure Building, to Universal TA, and the title, Direct Services, to Targeted and Intensive TA.

Another potential reason to in question 2 about the reasons for the different focus now (the only prompt is the pandemic) should be input from the Special Advisory Committee. In fact, the role and

activities and impact of the Special Advisory Committee should be reflected as a separate category in both the survey (see A12) and the interview, including in Question 3 as well.

National PLACE strongly supports the use of Question 20 in the interview.

SEA Survey & Interview Guide

We strongly recommend adding “social-emotional development” to the definition of family engagement (“involving student academic learning, social-emotional development, and other school activities.”) We would also take out “as appropriate” in this paragraph. Being included in decision-making and on advisory committees is never “inappropriate.”

We make the same recommendations in terms of terminology/definitions in this survey as we did in the SFEC Director survey. We also make the same recommendations in terms of the lists of topics for this survey as we did for the SFEC Director survey.

Question 8: If you are going to ask the SEA about their level of satisfaction with their partnership with the SFEC, National PLACE recommends also asking this question of the SFEC Director about their SEA. We also recommend adding the opportunity for both the SEA and the SFEC Director to provide additional information on WHY – whether it is why they are satisfied, or why they are not.

National PLACE has no specific recommendations for changes to the SEA interview guide.

Thank you for the opportunity to provide these comments. Please feel free to contact me with any questions or for further discussion regarding the perspectives and recommendations of National PLACE and its members on the important issue of the implementation and impact of Statewide Family Engagement Centers.

Sincerely,

Diana MTK Dautin
dautin@parentsatthetable.org

 Ensuring a Place at the Table for Every Family