

November 13, 2017

Attn: Jennifer Bell-Ellwanger
U.S. Department of Education
400 Maryland Ave. SW., Room 6W231
Washington, DC 20202
Submitted Electronically

RE: Secretary's Proposed Supplemental Priorities and Definitions for Discretionary Grant Programs
RIN 1894-AA09/ Docket ID ED-2017-OS-0078

Dear Ms. Bell-Ellwanger,

On behalf of National PTA and our nearly 4 million PTA members, we appreciate the opportunity to provide comments on the U.S. Secretary of Education's Proposed Supplemental Priorities and Definitions for Discretionary Grant Programs. As the oldest and largest volunteer child advocacy association in the United States with congresses in all 50 states, Washington, DC, U.S. Virgin Islands, Puerto Rico and Europe, National PTA is pleased to offer feedback on the Secretary's proposed priorities for the U.S. Department of Education (ED) to better meet the needs of our nation's students. For over 120 years, National PTA has been a strong advocate and a reputable resource for empowering all families to actively engage in their child's education.

National PTA is pleased that the Secretary included several priorities in her proposal that PTAs, parents and families have long advocated for—effective family engagement, a focus on high-quality educational experiences and hands-on learning opportunities in safe and supportive environments, access to well-prepared and effective teachers and principals, and robust pathways to college, career and the workforce—as critical levers to improve access, achievement and success for every child.

However, we do have serious concerns with the Secretary's proposed priority to "maximize" "educational choice," for students, which includes enabling access to private educational programs—otherwise known as vouchers.

Proposed Priority 1—Empowering Families to Choose a High-Quality Education that Meets Their Child's Unique Needs.

National PTA firmly believes that education should meet the needs of all students regardless of their gender, race, religion, sexual orientation, disability, immigration status or socioeconomic status. We agree with the Secretary that the Administration's goal should be "to maximize availability of high-quality learning opportunities," however we oppose Priority 1 as its sole aim is

to “maximize” “educational choice,” for students, which includes emphasizing access to private educational programs—otherwise known as vouchers. Prioritizing access to private school vouchers would run counter to evidence-based models, would conflict with the Department’s core mission, and would harm, rather than help, the groups of students targeted by Priority 1 itself.

The Secretary’s Proposed Priorities state that the Department intends to support states and districts offering “innovative and, where possible, evidence-based models of educational choice.” Evidence-based models, however, demonstrate that private school vouchers fail students, parents, and taxpayers. There is a growing body of evidence demonstrating that private school vouchers fail to improve educational outcomes and instead, lead to declines in student achievement.

Recent studies of the Louisiana,¹ Indiana,² Ohio³ and District of Columbia⁴ voucher programs have revealed that students in voucher programs perform worse academically than their peers. In addition, studies of long-standing voucher programs in Milwaukee⁵ and Cleveland⁶ found that students who were offered vouchers showed no improvement in reading or math over those not in the program. It is clear that private school voucher programs do not comport with the Department’s priority of promoting evidence-based outcomes.

The Department should not award projects that support voucher programs—these programs do not serve all students, fail to improve academic achievement, undermine public education funding, harm religious freedom and lack critical accountability for taxpayers. Private school vouchers divert desperately-needed resources away from the public-school system to fund the education of a few voucher students. In addition, the public schools from which students leave for private voucher schools are spread throughout a school district. The reduction in students from each public school, therefore, is usually negligible and does not decrease operating costs of those public schools. That is one of the reasons why some voucher programs have resulted in multi-

¹ Morgan Winsor, [Louisiana’s Controversial Voucher Program Harms Poor Students, Lowers Grades, New Study Finds](#), Int’l Bus. Times (Jan. 10, 2016).

² R. Joseph Waddington and Mark Berends, Notre Dame’s Center for Research and Educational Opportunity, [Impact of the Indiana Choice Scholarship Program: Achievement Effects for Students in Upper Elementary and Middle School](#) 24 (June 2017).

³ David Figlio & Krzysztof Karbownik, Fordham Institute, [Evaluation of Ohio’s EdChoice Scholarship Program: Selection, Competition, and Performance Effects](#) 32 (July 2016).

⁴ U.S. Dep’t of Educ., [Evaluation of the D.C. Scholarship Program: Impacts After One Year](#) 11 (Apr. 2017).

⁵ E.g., Patrick J. Wolf, School Choice Demonstration Project, Univ. of Ark., [The Comprehensive Longitudinal Evaluation of the Milwaukee Parental Choice Program: Summary of Final Reports](#) (Apr. 2010). (Overall, there are no significant achievement gains of voucher students compared to public school students. “When similar MPCP and MPS students are matched and tracked over four years, the achievement growth of MPCP students compared to MPS students is higher in reading but similar in math. The MPCP achievement advantage in reading is only conclusive in 2010-11, the year a high-stakes testing policy was added to the MPCP.”)

⁶ E.g., Jonathan Plucker et al., Center for Evaluation & Education Policy, Univ. of Ind., [Evaluation of the Cleveland Scholarship and Tutoring Program, Technical Report 1998-2004](#) 166 (Feb. 2006).

million dollar deficits and tax increases. The government would better serve all children by using these funds to make the public schools stronger.

Furthermore, private school vouchers violate the fundamental principle of religious freedom because they pay for religious education with taxpayer funds. They also threaten the autonomy of religious schools by opening them up to government audits, control, and interference. Instead, the Department of Education's first priority should be funding, supporting and strengthening our public schools, which 90% of our students attend.

Our association remains steadfast in our approach of putting the needs of all children first by advocating for high-quality public education. National PTA supports public education as the major vehicle for preserving the basic values of a democratic system of government. Our educational system must be strengthened with the support of adequate funding, and continue to be governed by public officials. National PTA believes the best way to meet the unique educational needs of each student is to invest in high-quality public education programs.

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

National PTA firmly believes in the idea of fostering innovation and efficiency within the public education system so long as all parents and families, especially those who have traditionally been marginalized, are involved and empowered during strategy development and execution. National PTA does not support innovation and efficiency that is detrimental to the rights, needs and overall well-being of students. Efficiency in education should not be conflated with limiting services or ending effective programs in an attempt to "save money." Finally, we urge the Secretary to not equate streamlining education with reducing or eliminating the evaluation of projects or programs, or other requirements that provide transparency to parents, policymakers, teachers and school leaders and ensure they are improving student outcomes.

Proposed Priority 3—Fostering Flexible and Affordable Paths to Obtaining Knowledge and Skills and Proposed Priority 4—Fostering Knowledge and Promoting the Development of Skills that Prepare Students to be Informed, Thoughtful, and Productive Individuals and Citizens

National PTA fully supports the Secretary's Proposed Priorities 3 and 4 to offer multiple paths to obtaining and developing students' knowledge and skills so they may become informed, thoughtful and productive members of society. Our association recognizes that all students learn and develop differently. We are committed to joining the Secretary's efforts to make every child's potential a reality and ensure every child is ready for college or a career upon graduation.

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

National PTA has a long history of advocating for the rights of students and children with disabilities, unique gifts and talents. Like the Secretary, our association believes that every student, regardless of their disability or academic ability, deserves a high-quality, public education. We encourage the Secretary to consider improving access for students with special needs to receive quality instruction and support from teachers, school counselors and other specialized school support personnel who have completed the state licensure or certification process when evaluating discretionary grants. We also urge the Secretary to acknowledge in this priority the need to better engage parents and families in the development of their child’s individualized education program (IEP) and 504 plans. We ask that the Secretary also consider prioritizing programs that would implement positive behavioral interventions and supports (PBIS) as an alternative to exclusionary school discipline practices such as in and out-of-school suspensions.

We appreciate the Secretary’s proposed priorities in this area to ensure students with special needs have access to, and receive, a high-quality education that is meaningful and appropriately ambitious. We are pleased that the Secretary is considering academic outcomes, functional outcomes, development of skills and social or emotional development as priority areas. In addition, National PTA supports the Secretary in prioritizing the need to provide accessible coursework, books and other materials for students with disabilities. We also appreciate the Secretary recognizing the need to develop opportunities for students who are gifted and talented.

However, meeting the unique needs of these students does not mean solely providing students with private school vouchers. Students with disabilities are particularly underserved by voucher programs. Private schools that receive vouchers do not adequately serve students with disabilities, often denying them admission or subjecting them to inappropriate or excessive suspensions or expulsions. In addition, private schools are not required to provide students with disabilities the same quality and quantity of services available to students in public schools, including those mandated under each student's IEP. For example, in Washington, DC, a significant number of students who received a private school voucher had to reject their vouchers because they were unable to find a participating school that offered services for their learning or physical disability or other special needs⁷. National PTA urges the Secretary to only consider programs that abide by all federal, state and local education and civil rights laws when determining grantees for discretionary funds.

⁷ <https://ies.ed.gov/ncee/pubs/20104018/pdf/20104018.pdf> (21.6% of parents who rejected a voucher that their child was offered did so because the school lacked the special needs services that their child needed, and 12.3% of the parents who accepted a voucher for their child but then left the program cited a lack of special needs services at the school they had chosen.)

Proposed Priority 6—Promoting Science, Technology, Engineering, and Math (STEM) Education, With a Particular Focus on Computer Science.

National PTA supports the Secretary in prioritizing discretionary grants that promote STEM education. National PTA shares the Secretary’s belief that “our Nation's economic competitiveness depends on our ability to improve and expand STEM learning and engagement.” As such, National PTA launched the [STEM + Families](#) initiative to increase access to STEM education and careers—especially among under-represented youth—by developing, evaluating and sharing effective ways to engage families in STEM experiences, while working with partners to improve access to STEM school and community learning environments. We are pleased that the Secretary’s priorities focus on hands-on STEM learning activities and partnerships between schools, education agencies, local businesses, nonprofits and higher education institutions to provide students with work-based learning experiences in STEM fields which enable all students to have the family and community support needed to access and pursue STEM opportunities and careers. We encourage the Secretary to revise Priority 6(f) as follows:

*(f) Creating or expanding partnerships between schools, LEAs and/or SEAs, local businesses, not-for-profit organizations, or institutes of higher education to give students **and families** access to **experiential learning opportunities** ~~internships, apprenticeships, or~~ and other work-based learning experiences in STEM fields, including computer science (as defined in this notice).*

Proposed Priority 7—Promoting Literacy

National PTA endorses the Secretary’s proposed priority of promoting literacy among our nation’s students. Every March, National PTA works to organize thousands of elementary schools to transform their National Reading Month event into a [PTA Family Reading Experience](#)—an interactive event that engages the whole family in reading activities. The event gives parents the opportunity to read with their children and leave the event with a deeper understanding of the simple ways they can foster a love and aptitude for reading at home. We look forward to working with the Secretary and ED to continue to promote literacy and ensure students have the skills they need to progress, pursue higher education and succeed in the workplace.

Proposed Priority 8—Promoting Effective Instruction in Classrooms and Schools.

National PTA is supportive of prioritizing the promotion of effective instruction in classrooms and schools through discretionary grant programs that recruit effective teachers, support teachers and leaders entering the profession, and develop teachers in the classroom. Like the Secretary, National PTA recognizes that educational opportunities for students in the public schools of this nation are dependent on the quality of instructional programs and personnel.

We urge the Secretary to add an additional priority to focus on increased professional

development for teachers, school leaders and specialized instructional support personnel on effective and evidence-based strategies to engage families in their child's education. Decades of research⁸ prove that families play a critical role in children's academic success, no matter a family's income or socioeconomic background. As such, we request the Secretary add:

(g) increasing professional development for teachers, school leaders and specialized instructional support personnel on effective and evidence based strategies to engage families in their child's education

Proposed Priority 9—Promoting Economic Opportunity

National PTA is particularly pleased that the Secretary agrees that prioritizing family engagement in education is critical to meeting the needs of students and has stated so in Priority 9(b)—*Building greater effective family engagement in their students' education*. More than 40 years of research shows⁸—regardless of a family's income or socioeconomic background—family engagement in education is essential for student success. Students whose families are involved attend school more regularly, earn better grades, enroll in higher-level programs and have higher graduation rates.

We hope that the Secretary will look to National PTA as a resource to achieve this shared goal to build greater, more effective family engagement in education and encourage the Secretary to carefully consider how family engagement can be integrated into *all* appropriate policy initiatives that the Administration may advance or support. Too often, family engagement is not systemically included in policy proposals, thereby reducing the opportunity to have an impact. Once it is made a more purposeful element of policy proposals, family engagement can become a powerful tool in advancing the development and achievement of our children. Furthermore, we encourage the Department of Education to employ the appropriate resources in the dissemination of research and best practices to support family engagement in local communities.

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

For over 120 years, National PTA has advocated to improve the health and safety of our nation's students. Our association encourages the Secretary to include in her priorities a focus on improved access to qualified school-based health and wellness practitioners such as nurses, school psychologists, counselors and social workers. We are pleased that Secretary has included a focus on positive learning environments that prevent bullying and violence. National PTA supports the

⁸ Henderson, A. T., & Mapp, K. L. (2002). A New Wave of Evidence: The Impact of School, Family, and Community Connections on Student Achievement. Annual Synthesis 2002. *National Center for Family and Community Connections with Schools*. Retrieved from <https://www.sedl.org/connections/resources/evidence.pdf>

development and implementation of school policies that address, prevent and eliminate all types of bullying behavior directed at any student—especially vulnerable populations such as LGBTQ youth and students with special needs—both inside and outside of school. We request that the Secretary revise Priority 10 as follows:

- (a) *Creating positive and safe learning environments, including **improved access to qualified school-based health and wellness practitioners such as nurses, school psychologists, counselors and social workers in the school building** and by providing school personnel with effective strategies.*

Proposed Priority 11—Ensuring that Service Members, Veterans, and Their Families Have Access to High-Quality Educational Choices

National PTA has long been a cornerstone in creating supportive communities for service members, veterans and their families. PTAs have served Department of Defense schools for nearly 60 years and currently represent over 30 schools in Europe. Our association supports the utilization of the purposes of the Interstate Compact on Educational Opportunity for Military Children, which is an agreement among states and school districts that “addresses key educational transition issues encountered by military families including enrollment, placement, attendance, eligibility, and graduation.”⁹

We are pleased that the Secretary is considering prioritizing projects that offer supports to address the challenges military-connected students face. However, we are concerned the Department will exploit this priority to allow for a private school voucher program for military-connected students. Relying on a private school voucher system to support military children will not provide all military-connected youth with the supports and resources they need.

Private school vouchers do not work for military-connected students. Those school districts serving military-dependent children, and the students themselves, face unique challenges such as the emotional stress that children and families face when a parent is deployed. These challenges are recognized by public school districts, which offer a complex system of support, including professional development for school counselors to ensure a safe and healthy learning environment. In fact, the Military Interstate Children’s Compact—which is an agreement among states and school districts that “addresses key educational transition issues encountered by military families including enrollment, placement, attendance, eligibility, and graduation”⁹—does not extend to non-public schools. By using vouchers, these students would forfeit the benefits and services they would otherwise receive in public schools. Therefore, we oppose any efforts that would divert public funds to private schools in an attempt to support military-connected students

⁹ Military Interstate Children’s Compact Commission, About MIC3, <http://mic3.net/pages/About/about.aspx>.

and families.

Thank you for the opportunity to provide comments on the Secretary's Proposed Supplemental Priorities and Definitions for Discretionary Grant Programs. National PTA values our strong and long-standing relationship with ED and we look forward to continuing to collaborate to make every child's potential a reality. Please do not hesitate to contact Jacki Ball, Director of Government Affairs, at jball@PTA.org or (703) 518-1243 to answer any questions or provide further input as needed.

Sincerely,



James L. Accomando
President
National PTA



Nathan R. Monell, CAE
Executive Director
National PTA