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U.S. Department of Education
400 Maryland Avenue SW
LBJ, Room 6W208C
Washington, DC 20202

Re: Docket ID number ED-2021-SCC-0164, Agency Information Collection Activities; Comment Request; Evaluation of the Implementation of the Statewide Family Engagement Centers

On behalf of National PTA, we appreciate the opportunity to provide comments in response to the Request for Public Comment on the Evaluation of the Implementation of the Statewide Family Engagement Centers. National PTA is a network of families, students, educators and community leaders devoted to the success of children through family engagement. With over 20,000 local units in the U.S. and abroad, our millions of members are committed to making every child’s potential a reality through advocacy and strong family, school and community partnerships.

Introduction

A clear picture of performance progress will clarify where grantees stand with their family engagement efforts, and where they project to be in the future. Family engagement is a powerful component of a child’s cognitive development, health, and academic performance. Increased support and parent involvement in a child’s life have been demonstrated to form foundational skills that help children reach their full potential. Services, tools, and support provided through family engagement programs like the Statewide Family Engagement Center (SFEC) program enable educators to more effectively differentiate instruction for their students when they reach out and engage their families. Moreover, these programs are especially impactful for families who face more barriers to engaging in their children’s education. The role that Statewide Family Engagement Centers (SFEC) play in communities is therefore critical and necessary in assuring the best outcomes for all children.

National PTA supports efforts that improve the quality of the SFEC program, and the way data focused on impact is collected. In particular, National PTA would like to comment on the following five areas regarding the evaluation of the implementation of Statewide Family Engagement Centers:

(1) This collection is necessary to the proper functions of the Department of Education.
National PTA believes that this collection is necessary to the proper functions of the Department of Education, especially around its goals of meeting students’ social, emotional, and academic needs, improving academic achievement, promoting equity, and deepening family engagement in education.

A key component of the Department of Education’s mission is to promote student achievement and educational excellence. Further, the Department has identified meeting student social, emotional, and academic needs as a particular priority for FY22. Since its inception in 2015, the federal Statewide Family Engagement Center program has been providing direct services to families to give them the tools to effectively work with their child’s school to improve both their child’s academic outcomes and overall well-being. The program also provides much-needed technical assistance and partnership development to states and school districts to foster meaningful engagement with families to further their children's academic and developmental progress. Research has shown that investing in family engagement advances the academic and developmental progress of our nation’s children and drives increases in student achievement.

Students with engaged families attend school more regularly, earn better grades, enroll in advanced level programs, and have higher graduation rates.

Another key component of the Department of Education’s mission is to ensure equal access to education and strengthen the Federal commitment to assuring access to equal educational opportunity for every individual, and the Department has identified promoting equity as a particular priority for FY22. While SFECs work with all parents and schools throughout their state, many focus on students of color, English learners, and recent immigrant children working to integrate into their new communities. Under 20 U.S. Code § 7243, SFECs are required to use the majority of funds “to serve LEAs, schools, and community-based organizations that serve high concentrations of disadvantaged students, including students who are English language learners, minorities, students with disabilities, homeless children and youth, children and youth in foster care, and migrant students.” A report published last year suggests that SFECs are already doing the important work of building equity within their states and are helping to reduce the opportunity gaps that have been exacerbated by the COVID-19 pandemic.

This collection will also support the Department of Education’s priorities around family and community engagement. Part of the Department’s mission is to “[s]upplement and complement the efforts of states, the local school systems and other instrumentalities of the states...community-based organizations, parents, and students to improve the quality of education.” Moreover, the Department’s final priorities for discretionary grant programs in FY22 highlight strengthening community engagement and “expanding or improving parent and family engagement” to advance systemic change. The Statewide Family Engagement Center program is critical to this effort.

It is National PTA’s belief that the effectiveness, sustainability, and scalability of the Statewide Family Engagement Center program will hinge on solid data and unified evaluation metrics. Understanding the performance and impact of the program will illuminate best practices that
can be replicated, identify opportunities for growth and improvement, and underscore the effectiveness of the program and the benefits of expansion into additional states.

(2) The results of this collection will be processed and used in a timely manner to inform Congress, current and future grantees, the Department of Education, and the public.

National PTA anticipates the results of this collection will be processed and used in a timely manner by the Department of Education to refine requirements for the FY 2023 and FY 2024 grant cycles and to inform the work of current and future grantees by highlighting best practices and innovative strategies for family engagement. Moreover, the results of this collection can be used to broaden awareness of effective family engagement strategies, enabling community partners and families to replicate best practices in their own communities on a local scale.

National PTA also hopes that the results of this collection will be used to inform decisions around federal budget and appropriations, especially for Fiscal Year 2024. Robust funding from federal appropriators will be needed to not only sustain the great work already underway, but also to expand the program to ensure that all families across the country have access to this program in the coming years.

(3, 5) The estimated burden of this collection is accurate, and the Department can minimize this burden by providing grantees with clear and consistent guidance around deadlines and requirements and by utilizing digital data collection tools that are accessible.

National PTA believes the estimated burden as detailed in Supporting Statement Part A SFEC 11.16.21 Section A.12 is accurate and is reasonable given the importance of this collection and the SFEC program to families across the country. Only minimal effort would be needed to ease the coordination of surveys and scheduling.

National PTA believes the Department can minimize this burden by utilizing digital data collection tools that are accessible, like Calendly and online survey tools, to collect information from grantees. As the Department moves forward with this data collection, it is also crucial that measures are clearly defined to avoid them being widely interpreted by grantees, and that deadlines and requirements are clearly communicated to grantees. As explained below, identifying an appropriate contact to respond to surveys/interviews within each SEA will also ease the burden of this collection and improve the quality of results.

4) The Department of Education can enhance the quality, utility, and clarity of the information to be collected in this study by encouraging consistency and disaggregation, focusing on meaningful outcomes and impacts, identifying appropriate grantee contacts, collecting quantitative and qualitative data especially from parents, and ensuring results are accessible to families.
It is National PTA’s belief that the effectiveness, sustainability, and scalability of the SFEC program will hinge on solid data and unified evaluation metrics. A unified evaluation is important to demonstrate how program funds are being used and the effectiveness of services and supports provided. Below are several recommendations regarding data collection for and evaluation of the program:

1. The evaluation should be unified so that all SFECs are collecting consistent data that can be aggregated across projects.
2. The data should be collected and compiled annually.
3. The evaluation data should demonstrate the total number of parents, education professionals and others served by the SFEC, broken down by demographics.
4. The evaluation should measure outcomes and impact of the services and support provided.
5. The unified evaluation data requirements should reflect the variety of SFEC services that different programs may provide but not be so specific that they become overly cumbersome.

Another critical area for improving the quality of this data collection will be for the Department of Education to ensure that an appropriate contact within each State Educational Agency (SEA) is identified to respond to any required survey or interview. Unfortunately, there has recently been a good deal of turnover at SEAs and, in some cases, SFECs have worked with multiple people in different departments since the start of their grant period. It would negatively impact the quality of this collection if, for example, the Department’s SEA contact on SFECs was only recently hired. National PTA recommends that the Department develop criteria for the contact person at each State Educational Agency for this grant and/or collect data to understand the historical relationship of who is being surveyed or interviewed from the SEA. It might also be worthwhile to encourage or require that the SEA identify a backup contact who has a consistent relationship with the SFEC in their state.

As the Department moves forward with this collection, it is crucial that all evaluation measures are clearly defined to avoid them being widely interpreted by grantees. In addition to the data the Department plans on gathering, we believe that collecting qualitative data from grantees would create a more comprehensive and quality visual of their goals, objectives, progress, and accomplishments. Soliciting feedback directly from a diverse sample of parents and families who have utilized the SFEC program will also be essential as the Department seeks to identify areas of strength and growth for the program. After all, the purpose of the SFEC program is to support effective family engagement policies, programs, and activities that lead to improvements in student development and academic achievement, and the parent voice will be critical as consumers of the program. We strongly recommend that evaluators engage in meaningful and frequent consultation with parents and families who utilize the program to gain a deeper understanding of how the program is fulfilling its purpose. Finally, we encourage the Department to take steps to ensure that the results of this collection are accessible to families and disseminated to key partners.
Conclusion

This year parents, guardians, educators, and school leaders have continued to endure pandemic-related challenges of online, hybrid, and altered in-person instruction. New challenges have arisen in engaging families at a time when families are primary to student success. High-impact family engagement, as supported by the SFEC program, is critical to ensuring that students are not suffering from learning loss, particularly those whose families and communities – many of whom already faced significant disadvantages before the COVID-19 pandemic – have been most impacted by the pandemic.

The Statewide Family Engagement Centers program promotes and implements evidence-based family engagement practices by working closely with state and local-level agencies. As an organization dedicated to transformative family engagement, National PTA actively supports the work done by the Statewide Family Engagement Centers. Standardized and aggregated data of the SFEC program’s performance would not only be better for congressional reporting but could also serve as a resource and reference for other family engagement efforts across the country.

We appreciate the opportunity to provide comments on the “Evaluation of the Implementation of the Statewide Family Engagement Centers.” It is our hope that the Department continues to support the important work of the Statewide Family Engagement Centers program and provides clear and measurable performance guidelines for grantees to track their progress.

Sincerely,

Anna King
President
National PTA

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Executive Director
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7 See 20 U.S. Code § 7243(b)(6)(B).