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April 11, 2016

Ann Whalen
Senior Advisor to the Secretary
Delegated the duties of Assistant Secretary
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

Submitted via email to SIG.StrongerTogether@ed.gov

Re: Use of SIG funds to advance socioeconomic diversity strategies

Dear Ms. Whalen:

The National Education Association's three million members work at every level of education. We believe that every student in America, regardless of family income or place of residence, deserves a quality education. Attending a school that is diverse affords critically important opportunity for students to learn how to thrive and contribute effectively, both during their school years and in the diverse communities, workplaces and world they will experience as adults.

Accordingly, NEA is pleased by the U.S. Department of Education's recent initiatives to encourage voluntary, community-supported socioeconomic school integration efforts, as reflected recently in its Stronger Together proposal and this request for input on how SIG funds might be used to implement such strategies. We appreciate the opportunity to comment on this matter.

I. General Suggestions on the Contents of Departmental Guidance

Beginning in 2017, under ESSA, states are required to set aside a greater share of funds (7 percent, in most cases, from 4 percent pre-ESSA) under Title I, Part A for school improvement activities in lieu of the SIG program, whose authorization expires and for which no funding will be available after 2016. NEA views this shift as an opportunity for ED to issue guidance to states on how to use funds under Title I, Part A to support socioeconomic diversity as a school improvement, including a school transformation, strategy. Using SIG funds for such purposes can be a part of the guide, but the main orientation of the guidance should be concentrated on

using Title I, Part A school improvement funds for this purpose, and on how SIG recipients might use their remaining SIG funds, and Stronger Together funds as these become available, to facilitate the continuation of their socioeconomic integration strategies as they make the transition to the new ESSA structure.

The guidance should make clear to states that the use of SIG funds to pursue socioeconomic integration strategies is permissible. It should also provide:

- the ample and growing evidence base for why it is a promising approach to educational improvement, including school transformation, efforts;
- examples of where such strategies have been implemented successfully;
- identification of practices and conditions that the research base and recent and historical experience suggest increase the chances of sustainable success of efforts which increase diversity in our schools;
- an explicit statement that SIG funds also may be used to voluntarily reduce racial segregation, consistent with the December 2011 U.S. Department of Justice and Department of Education “Guidance on the Voluntary Use of Race to Achieve Diversity and Avoid Racial Isolation in Elementary and Secondary Schools” (available at: <http://www2.ed.gov/about/offices/list/ocr/docs/guidance-ese-201111.pdf>). NEA notes and concurs with the views of the judicial and executive branches of the U.S. government that there is a compelling government interest in reducing racial isolation in K-12 public schools;
- an explanation of why, given high between-district levels of segregation and the existence of many school districts with insufficient socioeconomic diversity to implement solely within-district socioeconomic diversity approaches, inter-district and regional strategies may need to be encouraged and facilitated, along with a statement that SIG funds may be used to support such strategies; and
- a list of additional resources.

II. Comments on Some Particular Items on Which the Department Requested Input

Item # 3: Other policies or conditions that need to be in place for districts to successfully implement a comprehensive socioeconomic diversity plan that increases academic outcomes for students in its lowest performing schools

The importance of strong community and stakeholder engagement in implementing diversity strategies is critical. Previous efforts at reducing racial isolation in K-12 schools may have been hindered in their effectiveness and did trigger a backlash among residents of color, in some communities, due to factors such as far greater transportation burdens on students of color than on White students, and unwelcome or discriminatory treatment within schools that appeared to be desegregated at the school level (see Sarah Garland, *Divided We Fail*, for an account of the Louisville, Kentucky experience). Addressing such concerns can help create and maintain community support for diversity strategies, both socioeconomic and racial.

Racial desegregation strategies have sometimes used rigid, within-school tracking practices that tended to create or amplify racial divisions and led to inferior learning opportunities and stigma

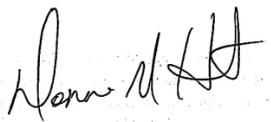
for students of color. Pressures to utilize tracking practices that may exacerbate socioeconomic or racial disparities in opportunity might be reduced by complementing school diversity strategies with preschool programs, as practiced by the Morris Jeff Community School in New Orleans cited favorably by Secretary King. (<https://medium.com/@JohnKingAtED/stronger-together-why-our-budget-supports-voluntary-community-led-efforts-to-increase-diversity-53b45a5f49df#.8qiqx1vq2>). Phasing in school diversity strategies beginning with preschool cohorts may help to enhance readiness to learn for all students entering their K-12 school years. The use of community school approaches also could help to complement diversity strategies by providing better access to services and support for students, enabling them to benefit more fully from their schooling and also mitigating pressures to use potentially damaging tracking practices. It is critically important to the success of diversity efforts that all students feel safe in a supportive school climate and environment. The availability of guidance and resources to assist schools in creating such environments is likely to lead to greater student, parental, and community support and better results.

Item #4: Methods and measures states and districts could use to demonstrate progress in implementing a comprehensive socioeconomic diversity plan.

We believe it is important to monitor progress by assessing impacts and outcomes, as well as the implementation of, comprehensive socioeconomic diversity plans. Impact and outcome assessments should be based on a broad range of measures and indicators that communities themselves identify as important to them.

Thank you for this opportunity to comment. Please do not hesitate to contact Bob Tate, senior policy analyst in the Education Policy and Practice Department, at btate@nea.org should you have any questions.

Sincerely,



Donna M. Harris-Aikens
Director, Education Policy and Practice