

Afterschool Alliance Comments

On behalf of the 26,000 afterschool program providers we work with, the Afterschool Alliance respectfully submits the following comments in response to Docket No.: ED-2013-ICCD-0006 regarding Evaluation of State Expanded Learning Time, released on April 15, 2013.

We are extremely concerned that the proposed evaluation study is expensive and premature given that the Department of Education's flexibility waivers are in the very early stages of implementation. Based on our communications with State Education Agencies (SEAs), we are aware that many of the states that were granted the 21st Century Community Learning Centers (21st CCLC) flexibility are in fact not even using that flexibility due to concerns about the legality of allowing 21st CCLC funds to be used during an extended school day.. SEAs are justifiably concerned given that the current statute authorizing the 21st Century Community Learning Center initiative prohibits the use of these funds during school hours and in ways that would normally be paid for with local, state or other federal funding streams. Therefore the evaluation is studying usages which are inappropriate and which violate the underlying statute.

Of greatest concern is the high cost of this study during tough economic times. Our understanding is that the estimated cost of the study is \$1.7 million for 22 interviews over a 13 month period to collect information that is already being collected from other Department research studies and in some cases is also available from non-governmental sources and on SEA websites. In challenging economic times when afterschool providers are struggling financially, and in the context of sequestration resulting in 60,000 children losing access to quality afterschool programs, these funds could be much better utilized.

We feel this information collection is not necessary to the proper functions of the Department and with an estimated report release in winter 2014, we do not feel the resulting study will be timely nor useful.

Thank you for the opportunity to comment and for continuing to acknowledge the importance of evaluating expanded learning opportunities. Please contact Erik Peterson at 202-347-2030 or epeterson@afterschoolalliance.org if you have questions.

ED RESPONSE:

ED thanks the Afterschool Alliance for the comments on the Evaluation of State Expanded Learning Time data collection package.

The purpose of the IES data collection is to collect in-depth information on states' plans for the use of 21st CCLC funds to support expanded learning time (ELT), including how states are altering the structure of their 21st CCLC competitions to allow for ELT and any elements or components of ELT that states require sub-grantees to implement. The IES study will provide early implementation information on states that received the optional ESEA Flexibility waiver to use 21st CCLC funds to support ELT. The report will provide important information to ED,

policymakers, and practitioners on how states are incorporating ELT into their 21st CCLC sub-grant competitions. Early information about new policies such as the use of 21st CCLC funds to support ELT can help inform policy and program improvement.

The feasibility phase of the study is currently funded at \$1 million. We estimate that this funding is sufficient to complete the activities outlined in the OMB package, the core aspects of which are the following: assessing feasibility of a potential future impact study, conducting interviews with the 21st CCLC state coordinators in SEAs that have received the optional ESEA Flexibility waiver to use 21st CCLC funds to support ELT, and producing a report describing state 21st CCLC competition activities in those SEAs. As described in the OMB package, prior to interviewing each state coordinator, the contractor will collect information from existing sources such as state RFPs and websites to best inform each interview.

The other referenced ED study conducted by the Policy and Program Studies Service (PPSS) office had a different purpose and is based on information collected in fall 2012. The primary purpose of that effort was to describe the process of conducting state 21st CCLC sub-grant competitions under the 21st CCLC program. Because the PPSS study data collection was completed prior to most states finalizing their plans for incorporating ELT into their 21st CCLC sub-grant competitions, we believe there is value in the IES data collection effort.