

Agency Information Collection Activities Comment Request: Full-Service Community Schools Annual Performance Report

September 2023

RESPONSE TO PUBLIC COMMENTS

The Department of Education (ED) solicited comments on a proposed revision to the *Full-Service Community Schools Annual Performance Report*, an existing information collection, in a notice published in the **Federal Register** on June 8, 2023 (88 FR 37522). We describe and respond to these comments below. The commenters were broadly appreciative of the efforts made by ED to incorporate data to drive continuous program improvement, update application forms, and provide an electronic application process that is easy to use. ED received a total of six public comment submissions. Of those, five submissions provided specific substantive comments to which we respond below. Six commenters identified themselves. Five parties submitted comments on information collection. Comments from one party were unrelated to the information collection and therefore was not addressed.

BACKGROUND:

The Full-Service Community Schools (FSCS) program (Assistance Listing Number 84.215J) provides grants support for the planning, implementation, and operation of full-service community schools that improve the coordination, integration, accessibility, and effectiveness of services for children and families, particularly for children attending high-poverty schools, including high-poverty rural schools. More precisely, FSCS provide comprehensive academic, social, and health services for students, students' family members, and community members that will result in improved educational outcomes for children. These pipeline services fall under the four pillars of community schools: (1) Integrated Student Supports, (2) Expanded and Enriched Learning Time and Opportunities, (3) Active Family and Community Engagement, (4) Collaborative Leadership and Practices.

The FSCS program requires grantees to submit annual performance reports (APRs) to the Department. The APRs pay special attention to recording grantee performance in accordance with 34 CFR 75.110 using the performance measure and indicators, as outlined below. Distributing the APR to all FSCS grantees will enable the collection of responses and data concerning the performance measure and indicators.

FSCS Performance Measure: Provision of services to students, families, and community members and individuals

FSCS Performance Indicators:

1. Student chronic absenteeism rates;
2. Student discipline rates, including suspensions and expulsions;
3. School climate information, which may come from student, parent, or teacher surveys;
4. Staff characteristics, including information on the number, qualifications, and retention of school staff, including the number and percentage of fully certified teachers, disaggregated by race and ethnicity, rates of teacher turnover, and teacher experience;
5. Changes in school spending information;
6. Graduation rates;
7. Provision of integrated student supports and stakeholder services;
8. Expanded and enriched learning time and opportunities;
9. Family and community engagement efforts and impact;
10. Collaborative leadership and practice strategies, which may include building the capacity of educators, principals, other school leaders, and other staff to lead collaborative school improvement structures, such as professional learning communities;
11. Regularly convening or engaging all initiative-level partners, such as local educational agency representatives, city or county officials, children’s and youth’s cabinets, nonprofit service providers, public housing agencies, and advocates;
12. Organizing school personnel and community partners into working teams focused on specific issues identified in the needs and assets assessment; and
13. Regularly assessing program quality and progress through individual student data, participant feedback, and aggregate outcomes to develop strategies for improvement.

PUBLIC COMMENTS AND RESPONSES

1. Addressing Data Availability and Accessibility

Comments:

Commenters noted that some data may be hard to access or may not be available to all grantees. For example, elementary and middle schools will not have access to high school graduation rates. In addition, commenters noted that it is not clear how indicator and performance measure data will be aggregated or “rolled up” from the school level to the program level.

Response:

The new reporting form and guidance makes it clearer which data is required of all grantees and describes how that data can be accessed through administrative or non-administrative means. The updated reporting form also includes sample data collection items for schools and grantees to provide a clearer picture of the level of reporting for each indicator and performance measure. In addition, the updated guidance provides flexibility to grantees in cases where specific data such as high school graduation rates may not be available.

2. Including additional Quality Qualitative Data

Comments:

Multiple commenters provided suggestions focused on incorporating qualitative data, including measures unique to each grantee. Specifically, comments noted that this qualitative data can provide a more comprehensive and quality understanding of implementation when it is used with other quantitative measures. Two comments noted that qualitative data can allow multiple perspectives to inform continuous improvement—including qualitative data from students’, families’, and educators’ responses to surveys.

Response:

The updated guidance and reporting forms incorporate more opportunities for grantees to submit qualitative data, especially in the form of surveys or via open responses. The guidance and reporting forms also make clear that collecting additional qualitative data is allowable, but not required.

3. Increasing Measure Flexibility to Prevent Duplication

Comments also conveyed that some measures, such as a specific school climate survey, may be duplicative of surveys and data collections grantees are already conducting. To prevent duplication, comments suggested that the guidance provide opportunities to leverage existing grantee data collections such as state, district, or school-specific surveys.

Response:

The new reporting form allows for locally developed performance measures, especially for non-administrative indicators. The updated guidance also removes the requirement to use the U.S. Department of Education’s School Climate Survey so that grantees can use their own school climate surveys to collect information.

4. Fostering Disaggregation in Performance Indicator Measures

Comments:

Multiple comments noted that grantees should utilize disaggregated data to measure disparities consistently across indicators. Specifically, one commenter noted that performance measures should help answer the question, “who is better off?” And another suggested that disaggregating data should be consistently used for internal review and reporting.

Response

The new reporting form allows grantees to disaggregate data at the school and program levels. Adding specific categories for disaggregation in the reporting form also more easily allows grantees to measure disparities as well as overall numbers and averages.