February 20, 2015

RE: Comments on the 21st Century Community Learning Centers Annual Performance Report, Docket
ED-2014-ICCD-0166

On behalf of the Texas Partnership for Out of School Time (TXPOST) and the approximately 1.6 million children participating in 21st Century Community Learning Center (21st CCLC) funded programs, thank you for the opportunity to provide comments on the development of a new data collection system for the 21st CCLC program. As a frequent consumer of data from the previous annual report and related data collection system – PPICS – the TXPOST is quite familiar with the range of data being collected and the outstanding data questions that policy makers and other stakeholders frequently raise. Below we offer some reflections on the current data collection process for 21st CCLC and how these limitations can best be addressed in the development of the new annual performance report and related data collection system for the program.

The data used to assess how well grantees are supporting the positive development of participating youth needs to be modified to more reliably capture the impact on participating youth.

- *Some of the indicators are not sensitive enough to assess meaningful changes in youth academic development.* Indicators related to state assessment results in reading and mathematics are based on the percentage of youth attending the program 30-days or more that move from below proficiency in these subject areas to proficiency or above. For most youth served by the program, such a movement between proficiency categories would be a demonstration of substantial improvement well beyond what could be reasonably be expected from participation in an afterschool program. The current indicator provides very little information about how participation in the 21st CCLC program is supporting the academic development of participating youth.

- *Some of the indicators do not align well with approaches adopted at the local level to track student progress and achievement.* This is particularly an issue in relation to the indicators based on changes in reading/English and mathematics grades between the first marking period of the school year and the last marking period. In reporting these data, 21st CCLC sub-grantees are asked to evaluate if youth demonstrated a half grade or more improvement between these marking periods (e.g., from a C to a C+). Unfortunately, most report cards in use in elementary schools in particular currently use a standards-based format for reporting student performance, where several criteria related to reading and mathematics performance are independently graded. As a result, 21st CCLC program staff need to take steps to convert several standards for a given subject area into some cumulative measure of reading and mathematics performance solely for the purpose of meeting federal reporting requirements. This is a time consuming undertaking, and the adoption of less than optimal strategies for making this conversion serve to reduce the quality and validity of the data being collected in relation to these indicators.

To address the concerns regarding the indicators, and to capitalize on advances in both state data warehousing capacity and statewide evaluation efforts related to the 21st CCLC program, we suggest other more meaningful indicators for the program.

- *Student Growth Percentiles.* Increasingly, states are taking steps to calculate student growth percentiles to more accurately calibrate the extent to which youth are growing in core academic areas like reading and mathematics. Such metrics offer a more sensitive means based on more objective and empirically-derived data to understanding how youth participating in 21st CCLC are developing knowledge, skills, and competencies in reading and mathematics.

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- *Other School-Related Outcomes.* Statewide evaluations completed by the American Institutes for Research in five states during the span of the past 5 years have demonstrated meaningful, average program impacts on decreasing unexcused absences and disciplinary incidents and increasing the probability of on-time grade promotion (see Naftzger et al, 2013; Naftzger, Vinson, Liu, Zhu, & Foley, 2014; Vinson, Marchand, Sparr, and Moroney, 2013 for examples). Data associated with each of these outcomes are often captured in state data warehouses and offer a more complete picture of how the program is having a positive impact on participating youth in areas known to be related to school attachment and success.

To more accurately quantify the impact of the program on youth outcomes, youth participation should be tracked over time, across multiple years and efforts should be made to compare regular 21st CCLC attendees with similar youth not participating.

The data collected should not be limited to youth outcomes and should align with a larger conceptual framework around how youth benefit from their participation in the program. The afterschool research base offers a general framework for key elements that must be in place to support youth outcomes, such as program quality, youth participation and engagement.

- State 21st CCLC systems have come to rely upon formal assessment tools to define quality afterschool practice and support continuous improvement. Given the investments states have made in developing these infrastructures and the importance of quality, we would recommend considering the adoption of indicators such as these:

    - The percentage of states that have formally adopted one or more quality assessment tools or measures for use by their sub-grantees during the reporting period.
    - The percentage of states that provided training to their sub-grantees on how to use adopted quality assessment tools to support quality improvement efforts during the reporting period.
    - The percentage of sub-grantees that completed a self-assessment using one or more quality assessment measures during the reporting period.
    - The percentage of sub-grantees that completed the quality improvement process adopted by the state with fidelity.

- In order for youth to benefit from programming, they need to attend programming, ideally at high levels, across multiple years and in a variety of different types of activities. They need to also experience both engagement and interest during their activities in order to develop the beliefs, skills, and knowledge that can help them in school and beyond. In light of these considerations, we would recommend considering the adoption of indicators such as these:

    - The percentage of youth attending programming during the reporting period that participated in X days or more of activities provided by 21st CCLC sub-grantees (exact levels need to take into consideration the grade level of participating youth, school mobility levels, etc.).
    - The percentage of youth attending programming that participated in X days or more of activities provided by 21st CCLC sub-grantees for at least two consecutive years (exact levels need to take into consideration the grade level of participating youth, school mobility levels, program availability as youth transition to middle and high school, etc.).
    - The degree to which youth report having supports and opportunities during their participation in 21st CCLC programming that are consistent with research-based quality practices.
    - The degree to which youth report high levels of interest and engagement in program activities.

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The data collection approach adopted by the Department needs to more efficiently capitalize on state-based student information systems and data warehouses and applications adopted specifically to track youth participation in 21st CCLC.

- State-based systems provide access to data on a wider domain of possible youth outcomes and allow for more efficient collection of data and more objective reporting of youth outcomes. A substantial proportion of the youth outcomes data collected from the current system is reported directly from sub-grantees, who need to go through a process to obtain data on youth outcomes from the local educational agency, match that data with participant records, perform a series of calculations outside the confines of the federal system to aggregate the data, and manually enter calculated values into the federal system. Each of these steps takes up valuable time which could be dedicated to program planning and delivery and opens the door to errors and mistake in the collection, aggregation, and reporting of information.

- Many states have implemented an approach to streamline this process. A recent survey of 21st CCLC state coordinators completed by the American Institutes for Research suggests that approximately half of states have adopted some type of system which collects statewide student identifiers from their sub-grantees which is then used to obtain the data needed for federal reporting purposes and/or to support statewide evaluation efforts.

- It is critical that new reporting requirements for 21st CCLC recognize the existence of these state-based systems and make the process of transferring data from these systems to the federal reporting system an easier and more efficient one.

The data collected via the new system should support the quality improvement efforts of states and sub-grantees.

- In addition to addressing the indicators for the program, the issue of timeliness and accessibility needs to be addressed in the redesign of the federal 21st CCLC data collection system. Flexibility needs to be given to states in terms of when certain pieces of data are collected in the system for a given reporting cycle. This helps ensure states have the data when they need it—to support quality improvement processes, training and technical assistance, and monitoring activities.

- Data reported by sub-grantees also need to be immediately available to state and sub-grantee users of the system through value-added system features which facilitate efforts to interpret the data, make relevant comparisons across time and groups of programs and participants, and link other critical data about youth and program operation maintained outside the system to the data collected via the federal reporting process.

Lastly, the Department should ensure that regular program evaluation reports are publicly available that help answer the most common questions posed by stakeholders, such as policy makers.

- The most recent publicly available national report on 21st CCLC dates back to 2009-2010, despite the fact that sub-grantees and grantees have been entering data in PPICS up until Fall 2014. The Department should produce timely reports that consistently include a key set of data points from year to year that allow for analysis of program growth, shifts in participation by grade level, income level, ethnicity and more. Based on the current set of indicators, below is a list of national data points that should be available each year:

    - Number of 21st CCLC grants awarded.

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- Number of 21st CCLC centers nationwide.

- Number of attendees and characteristics of attendees – Free/reduced price lunch percentage, ethnicity, English Language Learners.
- Number of regular attendees and characteristics of – Free/reduced price lunch percentage, ethnicity, English Language Learners.
- Number of parents served through 21st CCLCs.
- Average first year grant size in dollars.
- Number and percentage of grantees that are school districts, community based organizations, faith based organizations, for-profit, etc.
- Number and percentage of centers located in schools versus not in schools (list other locations with percentages).
- Average hours centers are open.
- Average weeks centers are open per year.
- Average number of days per week centers are open.
- Most common activities offered (%).
- Students served – grade level breakdown of ES/MS/HS (%).
- Mature program regular attendance rate versus immature program attendance.
- Improvements in math and reading grades (regular attendees and all attendees).
- Improvements in Math and reading test scores (regular and all attendees).
- Homework completion, class participation, student behavior (regular attendees and all attendees).
- Average Number of partners – most common partner types.
- Types of services provided by partners.
- Number of paid staff – include info on staff experience and roles.
- Average number of additional funding streams and most common funding streams.
- Average total amount of additional funding provided by partners, including in-kind contributions.
- National number of grant applicants versus actual number of grants awarded and total funding requested versus funding awarded.

Again, thank you for providing us with this opportunity to comment on the proposed 21st CCLC Annual Data Collection. We look forward to working with the Department of Education to address our concerns. If you have any questions regarding our comments, you can reach me or Jen Rinehart at 202-347-2030.

Sincerely,

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