May 11, 2018

Honorable Betsy DeVos
Secretary
United States Department of Education
400 Maryland Avenue, SW, Room 7E307.
Washington, D.C. 20202

Dear Secretary DeVos:

Thank you, kindly, for soliciting public comment regarding the new Statewide Family Engagement Centers’ (S-FECs) federal investment opportunity as authorized under the Consolidated Appropriations Act of 2018. We are especially pleased to provide feedback regarding Title IV, Part E-Family Engagement in Education Programs. I am writing as President & CEO of the National Association for Equal Opportunity in Higher Education (NAFEO), the nation’s only national membership and advocacy association of all HBCUs and PBIs, representing the presidents and chancellor of these richly diverse institutions, the 700,000 students, 70,000 faculty, 7 million alumni, and those in the service communities of these institutions, disproportionate percentages of whom are low-income, first generation families and students of color. NAFEO is the 501(c) (3)-membership association of the nation’s 106 HBCUs and roughly 80 PBIs. NAFEO serves as “the voice for blacks in higher education.” HBCUs have a $15 billion short-term economic impact. They graduate 40% of African American public school teaching professionals; in excess of 40% of African Americans who get advanced degrees in the sciences, technology, engineering, and mathematics (STEM); 60% of African American health professionals; and growing percentages of African Americans in sustainability and Homeland Security professions, the arts, and humanities. Learn more at www.nafeo.org.
As the founding fathers and mothers of the nation’s HBCUs believed that societal and individual deficits could be overcome with education. So, too, do we believe in the transformative power of education. People with more education are more likely to vote, to participate actively in civic affairs, and to perform community service than people who are not college graduates. Parental involvement in K-12 education tends to increase with a parent’s education level.

We believe also in the transformative powers of HBCUs. Located in the “belly of the beast” HBCUs have since their founding been preparing diverse students, but mostly African American students, to assume the responsibilities associated with adulthood, generally, and African American adulthood in particular. HBCUs have recruited and enrolled, nurtured, developed and offered a personalized, welcoming and challenging environment to a broad and diverse group of students, some of whom might not have otherwise gotten a higher education because of race, ethnicity, gender, religion, socio-economic status or some other non-bona fide bar to admission in other institutions. Others of whom could thrive in the most highly selective institutions in the world.

HBCUs educate a disproportionate number of students of fewer financial means. They have additionally served and are continuing to serve as resources for meeting the vital social service, economic, educational and recreational needs of the communities in which they are located. HBCUs are uniquely positioned and morally obligated to lead in recapturing lost or fallen youth, restoring hope, promise, purpose, and possibility, and ending the cradle to grave pipeline.

Collectively, they have a short-term economic impact on their communities of $15B.

In the early years of HBCUs, some began with medical schools, law schools and other undergraduate, graduate and professional schools, but many served early childhood, elementary, secondary, and postsecondary education functions. Today HBCUs are as richly diverse as their historically White college and university colleagues.

Key to the success in educating the progeny of the American slave system in the early years of HBCUs was the involvement of the “village” about which so many have spoken. Children need the early and continuous involvement of their families and those in their extended families—their villages. If appropriately designed and funded, the Family Engagement in Education Centers have the potential to foster the villages needed across the Nation to improve student development and academic achievement.

Parent or parent figure participation in the education of their children is a key predictor of student academic success. Family engagement is critical for the success of students, but so, too, is it important for the success of the educators, the schools and the school systems educating the growing populations of the states and the nation: students who are low-income, first generation,
students of color, many for whom English is not their first language, and increasing numbers of whom are anchored in faiths that are not Protestant, Catholic, or Jewish.

The proposed Family Engagement in Education Programs grant is a step in the right direction of investing in initiatives to assist state and local educational agencies and partners to strengthen critical relationships between parent-teacher, parent-counselor, parent-school system, parent-school board, and parent-school-community, so vitally important for fostering student learning and improving educational outcomes, especially for the growing populations of the states and the Nation. We believe, however, that some of the language, the omission of some key partnerships, and one or two of the proposed definitions might have unintended adverse impacts. We propose adjustments, herein, to begin what we hope will be an ongoing and fruitful discussion with the Department.

Context

Today, efforts to improve education outcomes for all students must increasingly and more strategically target low-income, first generation students and students of color—the growing populations of America. By 2020, this Nation will be majority people of color, and increasing low-income and first generation. According to an ETS report, Challenges and Opportunities in Achieving the National Postsecondary Degree Attainment Goals by Michael T. Nettles, Asian American men and women have already exceeded the national goal of having 60% their subgroup with a 2- or 4-year degree by 2020 or 2025. White women are expected to achieve both goals nearly on time, and, “[T]he White population, overall, is predicted to arrive at the goals a few years beyond the target years of 2020 and 2025.” The Nettles report notes, however,

“By contrast, the prospects of the African American, American Indian/Alaska Native and Hispanic populations attaining the goals in the next 40 years are not promising. Unless present trends are accelerated for men and women of these groups for each level and type of degree, and especially bachelor’s and higher degrees, not only will the three population groups (African American, Hispanic and American Indian/Alaska Native) fail to reach the goals in the foreseeable future, but also the progress that they make could be overrepresented by lower-status degrees and certificates and, in turn, they are likely to continue being overrepresented in relatively low-wage occupations.”

This ETS report and others making similar findings reaffirm the need for an approach to family engagement in education that attempts to reach and engage all families, but especially the families that are mostly being left behind.

For America to thrive in the increasingly competitive global economic environment, the Family Engagement in Education Programs and the Centers must target and prioritize funding for families who are African American, Hispanic, American Indian and Alaskan Native. The current proposal prioritizes investments in “disadvantaged students, including students who are English learners, minorities, students with Disabilities, homeless children and youth, youth in foster care, and migrant students.” This definition includes important stakeholders, but the definition should be amended to include, “especially students who are Title I- eligible students, Pell-eligible students and families, African American, Hispanic, American Indian, and Alaskan Native.” The Centers
must be designed to ensure that every child in our nation has “a healthy start, a head start, a fair
start, a safe start, and a moral start in life,” as Mrs. Marion Wright Edelman, President & CEO of
the Children’s Defense Fund, reminds us; a middle passage that connects more children and
families with their schools, teachers, counselors, teaching assistants, school-and community-

based health and faith professionals, school systems, school boards, state education and state
higher education executive offices. Some adaptations need to be made to the proposed
definitions, partnerships, descriptions, funding approaches and priorities to capture the proposed
expanded, yet proven essential partnerships for improving family engagement in the education of
their children and that of others, as well as engagement in the policies, programs, and activities
that lead to better outcomes in student development and academic enrichment.

The state education agency partnerships and local education agency partnerships must include
community-based organizations, state and local chapters as is anticipated, but also affiliates of
national non-profit associations with evidenced expertise in improving education outcomes for all
students, especially those who are least advantaged, and least likely to meet the 2020/2025
national education goals without greater and more strategic interventions. The partnerships must focus on
better equipping the parents as partners in enriching the mind, body and spirit, of the children.
Accordingly, other partners that should be considered are mental, physical and spiritual health
non-profit entities. The partnerships and Centers should include placing critical ushers--noble,
prepared, passionate women and men of all backgrounds, including those who share the
backgrounds, ethos, culture, language, religion, social, and civic underpinnings of the students in
their “village.”

There is an infrastructure in the Black Community in America that serves as the village to the most
privileged children in Black communities across America, to those of least advantage, and everyone in
between. Many are using the most promising research-based, data verified means of improving parental
engagement with the targeted institutions, outlets, associations and communities. The infrastructure is
referred to as the Black Leadership Family or the Black Village: professionals who are grounded in the
ethos, traditions, and mores of “the Black Family.” Historically Black Colleges and Universities, nine (9)
historically Black faith denominations, Black fraternal, social, and Greek-letter organizations, as well as
the other anchor institutions in the Black Community.

To optimize the opportunities created by the partnerships and Centers, HBCUs and MSIs must be anchor
institutions for the Centers and partnerships, in the states and communities in which they are located. Many
of these institutions currently serve as “CommUniversities;” early engaging children, parents, caregivers,
and the range of identified professionals in the lives of the children in their service areas and their
parents/parent figures. They capture children before they become lost, as well as many who are lost or have
fallen. They put them on the paths away from truancy, arrest, conviction, incarceration, and early, crime-
related death, and prepare, inspire, and connect them with education and wellness interventions. The most
promising Family Engagement Centers should be on the campuses of the colleges and universities in the
states educating disproportionate percentages of the students and families in greatest need in the state and/or
local service area, with disproportionate favorable results. Centers on HBCU and MSI campuses should
also be prioritized because of the proven value of underserved, low-income, first-generation students being
exposed to college campuses and campus life early in their lives, and with those on the campuses who can
and often do shepherd them from early life through college. The current proposal does not envision this.
We urge you to consider this as you modify the program.
At a minimum, please consider including “community-based organizations, national and state not-for-profit associations and chapters/affiliates of national non-profit associations with a proven record of improving student development and academic achievement in every place in the draft where it discusses the state and local educational agencies and the entities to which the program would provide financial investments for improving student development and academic achievement.

We respectfully request that you also consider adding under paragraph (6) “An assurance that applicant will—... (v) representatives of community-based organizations, national non-profit associations, state and local chapters or affiliates of non-profit associations....” We believe this addition would make certain that leading national associations in this space, with projects that are achieving many of the stated goals of the Family Engagement in Education program, such as the Children’s Defense Fund Freedom Schools, would not be excluded from receiving funds to anchor or partner with the state and local educational agencies, as we believe under the proposal they might be.

The CDF Freedom Schools® program seeks to build strong, literate, and empowered children prepared to make a difference in themselves, their families, communities, nation and world today. By providing summer and after-school reading enrichment for children who might otherwise not have access to books, the CDF Freedom Schools program plays a much needed role in helping to curb summer learning loss and close achievement gaps — and is a key part of CDF’s work to ensure a level playing field for all children. In partnership with local congregations, schools, colleges and universities [including HBCUs and MSIs], community organizations, and secure juvenile justice facilities the CDF Freedom Schools program boosts student motivation to read, generates more positive attitudes toward learning, increases self-esteem and connects the needs of children and families to the resources of their communities. Since 1995, more than 137,000 preK-12 children have had a CDF Freedom Schools experience and more than 16,000 college students and young adult staff have been trained by CDF to deliver this empowering model.

Another area in which we hope the Department will make adjustments is in Section 4504, Uses of Funds. As proposed, it appears as though some vitally important and proven partnerships for optimizing the education outcomes of our children may not be supported and encouraged. These initiatives have demonstrated their efficacy for achieving the goals of the program. Thy include the previously mentioned partnerships with parents with teachers, counselors, state and local school systems, mental, physical, and spiritual health providers to their children, PTAs, local and state school boards, state education executive offices and state higher education executive offices, to be sure. But they also include proven college prep and pipeline programs, such as TRIO programs and the US Dream Academy, financial literacy programs like DFree, and others that have illustrated positive outcomes in placing parents at the center of the education of their children, or in standing en loco parentis.

We also believe the program would be enhanced by including in the permissible funding, programs to support the transportation of parents, child care services to enable the parents to engage in the anticipated activities, and costs for parent enrichment programs to enable them to accomplish the things anticipated in Section 4504 (a) (1), and to otherwise engage with the intended partners. Finally, but certainly not of least importance, we believe it important that the program specify that a percentage of the partnership funds will be used to provide stipend and cover the expenses of the teaching professionals and counseling professionals who give so much of themselves to improve the education outcomes of their students and to engage with parents, for which they are not compensated. Their expenses are too often not covered. The stories abound about teachers paying out-of-pocket expenses for transportation-related expenses to visit the homes of their students, or stretching their budgets to cover their child care services so that they can engage their students in extra-learning opportunities, before- and after-school programs and semester break activities. We respectfully request that the proposal be revisited to make clear that these costs and similar costs will be covered under the initiative.
Please provide your every favorable consideration to the above initial NAFEO feedback to the new Statewide Family Engagement Centers’ (E-FECs), on behalf of its members. We view this as the first of what we hope will be many opportunities to fine-tune what we believe can be an important, innovative opportunity to move the nation closer to leaving no children behind, and for the families and students currently not expected to reach the 2020 and 20205 education goals for forty (40) years, to do so in significantly less time.

Should you have questions or require additional information, please do not hesitate to contact me at (202) 439-4704.

With thanksgiving and joy,

Lezli Baskerville

Lezli Baskerville
President & CEO
NAFEO