

To strengthen
and promote
cities as centers
of opportunity,
leadership, and
governance.



**National League
of Cities**

1301 Pennsylvania Ave., N.W.
Washington, D.C. 20004-1763
202-626-3000

Fax: 202-626-3043
www.nlc.org

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November 6, 2009

The Honorable Arne Duncan
Secretary of Education
United States Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Dear Secretary Duncan:

The National League of Cities' Institute for Youth, Education, and Families greatly appreciates the opportunity to comment on the proposed priorities for the Investing in Innovation (I3) Funds. We applaud the goals, and we believe there is a confluence between concerns of municipal leaders and those expressed by the Administration in this notice.

The National League of Cities (NLC) is the nation's oldest and largest organization devoted to strengthening and promoting cities as centers of opportunity, leadership and governance. NLC is a resource and advocate for 19,000 cities, towns and villages, representing more than 218 million Americans. The Institute for Youth, Education, and Families (YEF Institute), a special entity within the National League of Cities (NLC), helps municipal leaders take action on behalf of the children, youth, and families in their communities.

The National League of Cities (NLC), through its Institute for Youth, Education, and Families (YEF Institute), has established the **Mayors' Education Policy Advisors Network (EPAN)**. This national network facilitates communication among senior officials who are working with mayors on key issues related to education reform and school improvement. As we noted in our comments on the Race to the Top draft guidelines, during the most recent semi-annual meeting of Mayor's Education Policy Advisors Network (EPAN) held in San Francisco, California, from June 1-3, Assistant Deputy Secretary James Shelton participated in a session entitled, "An Education Stimulus for the Nation's Cities." In addition to more than 30 members of EPAN, we were joined by representatives of the Alternative High School Initiative (AHSI, for which the YEF Institute has been the lead organization for policy work) and the Early College High School Initiative (ECHSI).

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General Recommendations for the Role of Municipal Leaders and Cities in the Investing in Innovation (I3) Funds

Cities, and mayors in particular, are exerting leadership in education in a variety of ways. Secretary Duncan's call for more mayoral takeovers of urban school districts is just one of many routes municipal leaders across the country are taking to become highly engaged in education reform in their cities. Recent developments in municipal leadership around education have led to expansions of successful options for students and parents. One such important development is the mayor-led AHSI Place-Based Partnerships in Indianapolis, Indiana, Nashville, Tennessee, and Newark, New Jersey. These initiatives aim to demonstrate that jointly crafted, citywide commitments by municipal leaders, school district leaders, community leaders, and program innovators, with support from broader nonprofit and private sector networks, can significantly expand high-quality alternatives for high school, enabling higher numbers of young people to achieve academic and career success. Therefore, **EPAN strongly recommends that the final priorities and solicitation list *municipalities*, in conjunction with one or more LEA(s), as an eligible applicant for I3 funding.** Additional options for the Department include: 1) The final priorities/solicitation could clarify that the definition of non-profit organizations specifically includes units of local government; or 2) The final priorities/solicitation could establish a priority for LEA-municipal partnerships. Please see below for additional recommendations regarding ways that the I3 priorities/solicitation could include cities and LEA-city partnerships.

With regard to specific portions of the Department's proposed guidelines for the I3 Funds, EPAN offers the following comments:

- Directly below you will find examples of modified language of proposed requirements that include cities as eligible applicants, much in the same way that nonprofits are considered eligible – through an already established record of successful partnerships with one or more LEA. Proposed revisions appear in *italics*.

PROPOSED REQUIREMENTS:

Background:

The Investing in Innovation Fund would provide support to LEAs, and nonprofit organizations *and municipalities* that partner with one or more LEAs or a consortium of schools...

Proposed Eligibility Requirement

(5) In the case of a nonprofit organization *or a municipality*, provide in its application the name(s) of the LEA(s) with which it will partner, or the names of the schools in the consortium with which it would partner.

Note about Eligibility for an Entity that Includes a Nonprofit Organization or Municipality: ... Rather, the nonprofit organization *or municipality* would have to

demonstrate that it was a record of meeting those requirements through the assistance it has provided to one or more LEAs in the past.

- As illustrated by the AHSI Place-Based Partnership example mentioned in our general recommendations above, urban cities across the country engaged in similar education reform efforts have formed communities of practice that transcend state or regional borders. In addition to definitions for National level and Regional level, we suggest including a category that includes strategies or programs that are “cross-site” and urban in nature.

PROPOSED DEFINITION (additional):

Cross-Site Level: as used in reference to a Scale-up or Validation grant, describes a project that is able to serve a variety of communities and student population within multiple (at least three, either within one state or across states) urban areas, as well as with different groups of students described in section 1111(b)(3)(C)(xiii) of the ESEA (i.e., economically disadvantaged students, students from major racial and ethnic groups, migrant students, students with disabilities, students with limited English proficiency, student gender).

- EPAN believes that successful schools depend upon strong partnerships, especially across the government, public, private, and non-profit sectors. EPAN members have found that collaboration can lead to the creation of economies of scale, blended funding streams, and more stable and sustainable education initiatives. Cross-system partnerships provide the community with a level of ownership and accountability, which translates into increased buy-in from community members. Therefore, we recommend including partnerships with cities as a proposed selection criterion (in sections: C. Experience of the Applicants and F. Sustainability) for all three grant levels: 1. Scale-up Grants, 2. Validation Grants, and 3. Development Grants.

PROPOSED SELECTION CRITERIA

Proposed Selection Criteria (additional):

C. Experience of the Applicant.

(c) The past performance of the applicant in collaborating with municipalities, particularly in the following ways:

- (i) Partnerships that have engaged a mayor(s) and other local government officials for leadership;*
- (ii) Partnerships that have resulted in provision of additional access to wraparound support services and/or databases or effective ways to share data about students across various support service-providing agencies (e.g., housing, health care, transportation, child welfare, etc.);*
- (iii) Partnerships that have resulted in the creation and use of blended funding models, such as models that drew upon resources from various local, state, and federal funding streams; and*

- (iv) *Partnerships that have expanded afterschool and extended learning opportunities, particularly for high school age students.*

F. Sustainability.

- (c) *The extent to which the applicant provides evidence of specific ongoing municipal commitment and broad support from stakeholders across the city, particularly in the following ways:*
 - (i) *Commitment to partnerships that engage a mayor(s) and other local government officials for leadership;*
 - (ii) *Commitment to partnerships that create comprehensive wraparound services and/or databases or effective ways to share data about students across various support service-providing agencies (e.g., housing, health care, transportation, child welfare, etc.);*
 - (iii) *Commitment to partnerships that create and utilize blended funding models, such as models that drew upon resources from various local, state, and federal funding streams; and*
 - (iv) *Commitment to partnerships to expand afterschool and extended learning opportunities, particularly for high school age students.*

- EPAN commends the Department of Education for including youth who are over-age and undercredited, who have left school before receiving a regular high school diploma, who are at risk of not graduating with a regular high school diploma on time, who are homeless, who are in foster care, and who have been incarcerated as part of the definition of high needs students. Yet, EPAN believes that we need to do more than include them in the high needs group; we need to make them a priority for our nation, our states, our districts and our schools.

Proposed Competitive Preference Priorities

Proposed Competitive Preference Priority 9 – Innovations that Address the Needs of Vulnerable Youth.

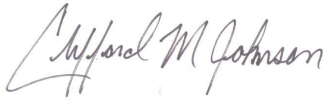
Background. Particularly for the nation’s large cities, there can be no true, long-term economic recovery without adequately educating far greater numbers of young people. No matter how steep the fiscal downturn, community leaders must redouble local efforts to improve graduation rates and – no less important – to create meaningful educational options for the staggering numbers of adolescents who have been pushed aside or given up on school altogether.

Statement of Proposed Competitive Preference Priority 9. We propose to give competitive preference to proposals that focus on the unique challenges of youth who are over-age and undercredited, who have left school before receiving a regular high school diploma, who are at risk of not graduating with a regular high school diploma on time, who are homeless, who are in foster care, and who have been incarcerated. Proposals must include practices, strategies, or programs to improve educational outcomes for the most vulnerable

young people.

In addition to our comments above, please note that NLC's YEF Institute heartily endorses the comments on Investing in Innovation submitted by the Alternative High School Initiative, Afterschool Alliance, and Pre-K Now. These organizations represent thousands of individuals and agencies across the country who are working to improve outcomes for young people. NLC shares the perspective of these organizations, and we hope you will take our endorsement of their comments under consideration.

Sincerely,

A handwritten signature in cursive script that reads "Clifford M. Johnson".

Clifford M. Johnson
Executive Director
Institute for Youth, Education, and Families
National League of Cities